

THE SUPREME COURT

APPEAL NUMBER: S:AP:IE:2023:000093

LOWER COURT RECORD: 2022/1456 P

SC 17 APPLICATION TO VARY OR RESCIND A FINAL JUDGMENT OR ORDER MADE BY THE SUPREME COURT

(issued under section 7(7) of the Courts (Supplemental Provisions) Act 1961, inserted by paragraph (a)(iv) of section 44 of the Court of Appeal Act 2014)

DAVID EGAN AND SHARON BROWNE

Plaintiffs / Appellants

-And-

STEPHEN DONNELLY, MICHAEL MARTIN, DR. TONY HOLOHAN and PAUL REID

Defendants / Respondents

NOTICE OF MOTION OF DAVID EGAN FOR AN APPLICATION TO VARY OR RESCIND A FINAL JUDGMENT OR ORDER MADE BY THE SUPREME COURT

(issued under section 7(7) of the Courts (Supplemental Provisions) Act 1961, inserted by paragraph (a)(iv) of section 44 of the Court of Appeal Act 2014)

1. Leave for relief pursuant to the provisions of a SC 17 Application to vary or rescind a final judgment or order made by the Supreme Court in order to comply with Article 34.5.6 of the Constitution Bunreacht na hEireann.

We bring this Motion to rescind or vary a final judgment to the Supreme Court under section 7(7) of the Courts (Supplemental Provisions) Act 1961, inserted by paragraph (a)(iv) of section 44 of the Court of Appeal Act 2014. We refer to and rely on the precedents of Greendale Developments Ltd. (in liquidation) : Stephen Fagan and May Malone Applicants v. Liam McQuaid [2000] 2 I.R. 514; Bula Ltd. v. Tara Mines Ltd. (No. 6) [2000] 4 I.R. 412; DPP v McKevitt [2009] IESC 29; Murphy v Gilligan

[2017] IESC 3) and many other relevant precedents cited below. The most exceptional circumstances exist in this court case and this is detailed below in this Motion and in the grounding affidavit.

The application of these precedents in this court case is carried out below in this Motion. In support of this Motion before the Supreme Court, we invoke articles 6, 40.1, 40.3, 43, 41.1, 41, 15, 29, 26, 39, articles 34 to 38, and articles 40 to 44 of the Irish Constitution encompassing fundamental rights and unenumerated rights. There have been significant breaches of these aforementioned Constitutional articles and rights in this case itself and in the substantive issue or sole issue of this court case, that being failure to get full informed consent and failure to enforce or impose the Precautionary Principle under Irish law and EU law, and this caused harm, loss and injury to thousands of Irish people.

We also invoke our international human rights as protected under ECHR and the European Charter of Fundamental Rights and the UN Declaration of Human Rights in this court case. There have been significant breaches of these aforesaid human rights in this case itself and in the substantive issue or sole issue of this court case, that being failure to get full informed consent and failure to enforce or impose the Precautionary Principle under Irish law and EU law. This covers both the human rights and Constitutional rights of the Plaintiffs which were breached and human the rights of those people referenced in our legal proceedings, namely the Irish people as cited in article 6 of the Irish Constitution which were also breached. This has caused harm, loss and injury to many thousands of living men, women and children throughout Ireland according to official state bodies such as the HPRA, the CSO, the GRO and Eurostat. The grounds for these aforementioned Invocations are outlined in this Motion and in the Grounding Affidavit and Exhibits and other legal submissions.

Reliefs Sought

We the Plaintiffs seek the following reliefs from the Supreme Court. Under this legal provision for an SC17 Application to the Supreme Court and under the Irish Constitution and applicable Irish law and EU law, we are asking the Honourable and Learned Judges of the Supreme Court for the following reliefs :

(i) set aside or overturn the judgments and orders of Twomey J. in the High Court

(ii) rescind the judgment of the Supreme Court in this case

(iii) hold full hearings of this case in the Supreme Court or direct them for full hearings in the High Court or the European Courts as this case involves breaches of several articles of the Irish Constitution, including breaches of the fundamental rights and unenumerated rights of many Irish people, breaches of ECHR rights and Charter of Fundamental Rights, and of international human rights, breaches of both EU law and Irish Law, superior court rules, judicial council rules and regulations and the Bangalore

Principles and the ancient legal rights to due process, fair procedures, fair hearings, equality of arms and audi alteram partem. This involves serious breaches of the Irish Constitution in such a manner as to render the Irish Constitution defunct and obsolete and involves serious breaches of human rights covered by Irish law and EU and UN law so as to render human rights non-existent in Ireland and involves attacks on the Common Good so as to render it a meaningless and redundant term in Irish Constitutional terms and legal terms. This case involves breaches of informed consent, the Precautionary Principle, the Irish Constitution, Irish law, EU law and international human rights which has caused loss, harm and injury to at least 21,000 living men, women and children in Ireland according to the HPRRA, an official government body. This is corroborated by the EMA or European Medicines Agency of the European Union. Official Irish government and EU figures and US figures show the real figures may be much higher, two to three magnitudes higher. And there is published statistical and scientific research to support this.

(iv) Supreme Court Orders of Discovery and of Mandamus and of Rectitude to reverse and stop breaches of the Irish Constitution and to protect and defend Constitutional rights which have been breached in this court case and which endanger the public and provide a means of compensation for the many thousands of Irish people who suffered harm, loss and injury from these covid19 vaccinations. We also invoke and cite the ancient legal principle and right of “restituto in integrum”.

This court case involved our application for a temporary Injunction until such time as informed consent could be given by parents of children for covid19 vaccines and the Precautionary Principle applied under Irish law and EU law and international law. We had data and documents from Pfizer and its own vaccine trial documents and its post trial monitoring documents and documents released under Court Orders, Government Orders, Parliamentary Orders, and FOI requests from official government and state bodies here and abroad, and regulatory bodies such as the HPRRA, the EMA, the FDA, the CDC and NIH and MHRA to substantiate and support our case before the court. We had a large amount of prima facie and irrefutable evidence of breaches of informed consent and the Precautionary Principle and of the Irish Constitution and we had expert witnesses such as medical doctors, scientists, etc. and witnesses who could corroborate this in court. We were blocked and prevented from full court hearings about this in court.

This court case involves breaches of such Constitutional rights as the right to life, the right to bodily integrity, the right to earn a living, the right to a family life, family rights, property rights, the freedom of the press and freedom of expression, the right to privacy and one's good name, and the right for one's case to be heard in court and accompanying right to due process, fair procedures, fair hearings and audi alteram partem and equality before the law, and the right to be fully informed about medical procedures,

vaccines, gene therapies and/or medical products which affect one's right to life and one's right to bodily integrity and the other aforementioned rights.

Exceptional Circumstances

The Supreme Court precedents and High Court precedents cited below state the necessity of "exceptional circumstances" in these type of court cases. By "exceptional circumstances" I refer to the following:

(i) Twomey J, the judge in the High Court case who blocked full hearings on the sole and substantive issue of the court case but he made judgments and orders on a case he never heard, thus depriving himself, the court, the Plaintiffs, the Defendants, the witnesses, and the expert witnesses of the Constitutional right to full hearings on the sole and substantive issue of the case. This was a breach of the Irish Constitution.

(ii) the judgments and orders of Twomey J. relied on fraud and were tainted by fraud and relied on breaches of the Irish Constitution and are thus null and void in law. The Supreme Court relied on these judgments and orders which relied on fraud and breaches of the Irish Constitution. We are pleading twenty five counts of fraud.

(iii) the person(s) who blocked our application for full Supreme Court hearings but made a judgment, depriving us of fair hearings, fair procedures and due process. This person(s) relied on the judgments and orders of Twomey J. which relied on fraud and on breaches of the Irish Constitution.

(iv) the breaches of Superior Court Rules, Judicial Council rules, Bangalore Principles, EU law, Irish law, ECHR law, Charter of Fundamental Rights, international human rights law and other laws in addition to breaches of the Irish Constitution which created fatal defects and flaws in the judgments and orders of Twomey J.. These are detailed in this Motion and grounding affidavit.

The most exceptional circumstances exist in this court case unprecedented in the history of the Irish state and in the period prior to 1922. The consequences of the aforesaid breaches above which have given rise to "exceptional circumstances" includes vaccine injuries, illnesses, disabilities and premature deaths caused to over 21,000 people, that being the people of Ireland as defined in article 6 of the Irish Constitution and which includes the Learned and Honourable Irish Judges of the various courts and/or their families and relatives and Legal Professionals and officers of the court. Surely the breaches of the Constitutional rights and international human rights of these people and the reckless endangerment of them needs to be addressed in full hearings of the Supreme Court regardless of the time and cost involved ? Surely the judges of the Irish courts and their families have a right to bodily integrity, right to

be fully informed, and right to life ? This comes within the remit of the Common Good as defined in the Irish Constitution and the Public Interest.

The legal term ‘Balance of Probabilities’ much beloved and relied upon by the courts applies here as scientific research has revealed that 1 in 800 vaccinated people developed serious adverse effects necessitating medical attention and/or hospitalisation and one of the adverse effects is death including ‘sudden death’. This issue has divided legal opinion, the legal profession, the officers of the court, and the judiciary in Ireland and abroad causing deep divisions in the legal profession and among the people of Ireland and is causing frustration, consternation, anxiety, and distress for judges and members of the legal profession throughout Ireland. And renewed calls for stronger measures to ensure full accountability under article 6 of the Irish Constitution, and stronger and more forceful implementation of the separation of powers and checks and balances to power under the Irish Constitution. I ask for full Supreme Court hearings of this case in accordance with the Irish Constitution, international human rights law and Irish law and EU law and the Bangalore Principles.

This court case cuts to the heart of the Irish Constitution and seeks to express, vindicate and protect the rights, freedoms, the sovereignty of the people of Ireland and the accountability of the government and the state to the people of Ireland, and the separation of powers and checks and balances to power to preserve and protect these aforementioned rights and freedoms which the Constitution upholds and the Supreme Court in this case is legally obliged to uphold. This court case is very clear in this respect. The Supreme Court appeal booklet is on the USB MEMORY STICK and titled ‘Supreme Court Appeal Booklet’. There were no Supreme Court hearings for this, but a judgment was made. The High Court judgments and orders are in the same booklet. There were no High Court hearings for the sole and substantive issue of the court case that being Informed Consent and application of the Precautionary Principle under EU law and Irish law, but a judgment was made. The sworn affidavits of our expert witnesses are in the folder titled ‘Expert Witnesses for the Court’ on the USB MEMORY STICK .

Purpose of our court case

This court case was brought under articles 40 to 44, 41, 40.3, 43, 6, 15, 29 and 39 of the Irish Constitution and under the term ‘Common Good’ as understood in the Irish Constitution, and under international human rights law and EU law and Irish law and involved our application for a temporary Injunction until such time as informed consent could be given by parents of children for covid19 vaccines and the Precautionary Principle applied under Irish law and EU law and international law, and Irish law, EU law, and the Irish Constitution fully complied with. We had data and documents from Pfizer and it’s own vaccine trial documents and it’s post trial monitoring documents and documents released under court orders and FOI requests from official government regulatory bodies here and abroad such the HPRA, the EMA, the FDA, the CDC and NIH and MHRA to substantiate and support

our case before the court. This was prima facie evidence and irrefutable evidence which was blocked from being heard in full court hearings on informed consent and the Precautionary Principle, and this evidence was dismissed and ignored by Twomey J. in his judgment and order.

We have evidence to prove that informed consent was NOT given for these vaccinations which is both a criminal offence and a civil offence, and the Precautionary Principle was NOT applied which is both a criminal offence and a civil offence. Point 2 of our grounding affidavit does into considerable detail about this denial of informed consent and non application of the Precautionary Principle. We had prima facie evidence of breaches of informed consent and the Precautionary Principle and of the Irish Constitution and of international human rights, but we were blocked from full court hearings about this in the High Court by Twomey J., yet he presumed to make judgment about this.

Speech delivered to the High Court at the end of High Court Proceedings on 12th July 2023

Notice of our appeal to the Supreme Court in Ireland delivered by Sharon Browne, Plaintiff, to the High Court on July 12th 2023

' Your Honour,

we are appealing the judgment today and

appealing the refusal of the judge to address the main issue of this High Court case that being an Injunction based on deprivation of Informed Consent for parents and guardians and appealing the refusal of the Judge to accept our prima facie evidence and our expert witnesses who are scientists and medical professionals and court witnesses who are seriously ill vaccine victims in full court hearings and

appealing the refusal of the Judge to recuse himself due to among other things objective bias, confirmation bias, inaccuracies, and lack of judicial independence in his costs judgment and appealing the costs judgment of the 25th April 2023.

We are appealing all of this to the Supreme Court on points of law, points of evidence, points of judicial procedures and superior court rules, and points of the Irish Constitution and points of international Human Rights law. '

On appeal to the Supreme Court, the Supreme Court made a judgment on the case without full court hearings on the substantive issue of Informed Consent and the Precautionary Principle and breaches of the Irish Constitution and the ECHR and Charter of Fundamental rights, which has led to injury, harm and loss to at least 21,000 people in Ireland, and without allowing us to present our witnesses and expert witnesses and our prima facie evidence for cross examination. The facts now show that both the High Court and Supreme Court made judgments and orders without full court hearings on the substantive issue of Informed Consent and the Precautionary Principle which was the purpose of the court case and breaches of the Irish Constitution and the ECHR and Charter of Fundamental rights, which has led to injury, harm and loss to at least 21,000 people in Ireland, and without allowing us to present our

witnesses and expert witnesses and our prima facie evidence for cross examination.

These are breaches of fundamental rights and unremunerated rights and Natural Law rights both of the Plaintiffs and the people of Ireland as defined in article 6 of the Irish Constitution who were directly impacted by this court case. I also refer to breaches of Irish, EU and international human rights and breaches of Irish law and EU law, breaches of the Nuremberg Code by Twomey J, the judge in the High Court case who blocked full hearings on the sole and substantive issue of the court case and by the persons who blocked our application for full Supreme Court hearings.

I also refer to breaches of the Judicial Council Act 2019, and the Judicial Guidelines for Irish judges, and the Bangalore Principles, and the Superior Court Rules and the ancient legal rights to due process, fair procedures, and audi alteram partem by Twomey J, the judge in the High Court case who blocked full hearings on the sole and substantive issue of the court case and by the persons who blocked our application for full Supreme Court hearings.

Our grounding affidavit details serious breaches of the Irish Constitution and EU law and Irish law and international human rights law and other laws. The “exceptional circumstances” demanded for an SC17 application to the Supreme Court are detailed in the Points in this document, the Motion, and in our grounding affidavit.

In support of my Motion here and in support of my case, I cite the Learned and Honourable Justice Susan Denham, ex Chief Justice of Ireland in Greendale Developments Ltd. (in liquidation) : Stephen Fagan:

" It would only be in most exceptional circumstances that the Supreme Court would consider whether a final judgment or Order should be rescinded or varied. Such a jurisdiction is dictated by the necessity of justice. A case will only be reopened where, through no fault of the party, he or she has been subject to a breach of constitutional rights."

" The Supreme Court has jurisdiction and a duty to protect constitutional rights. This jurisdiction may arise even if there has been what appears to have been a final Order. However, it would only arise in exceptional circumstances."

“It is only in most exceptional circumstances that this jurisdiction arises. The jurisdiction will only be exercised when a constitutional right or justice lies to be protected. The jurisdiction will arise only to protect constitutional rights. The jurisdiction will not arise, in general, if facts are in issue - unless the situation is an exception, e.g. order obtained by fraud. Even then, the court may exercise its jurisdiction in a particular manner involving another jurisdiction. The jurisdiction would not arise if the constitutional right could be protected in another way.”

“The Supreme Court has a jurisdiction to protect constitutional rights and justice. This jurisdiction

extends to an inherent duty to protect constitutional justice even in a case where there has been what appears to be a final judgment and order. A very heavy onus rests on a person seeking to have such jurisdiction exercised. It would only be in most exceptional circumstances that the Supreme Court would consider whether a final judgment or order should be rescinded or varied. Such a jurisdiction is dictated by the necessity of justice. A case will only be reopened where, through no fault of the party, he or she has been subject to a breach of constitutional rights.”

Barron J. agreed with Justice Denham

" Nevertheless, where such circumstances exist, this Court must be free to so declare and to indicate the procedures whereby such circumstances should be investigated. Not to be able to do so would conflict with the guarantee of fair procedures enshrined in the Constitution.”

Greendale was followed in the later Supreme Court decision of *Bula Ltd. v. Tara Mines Ltd.* (No. 6) [2000] 4 I.R. 412 and again by the High Court in *M.D. v. Minister for Health* (Unreported, High Court, 15th February, 2002) where O’Neill J. reviewed the jurisprudence including Greendale observing: -

“It would seem to me that the only circumstances in which the Supreme Court could interfere with a final order of that court is where a person can show that through no fault of his or hers, there has been a breach of natural justice in the conduct of the proceedings before the Supreme Court which would manifestly be irremediable unless the Supreme Court set aside the order impugned.”

Murray J. confirmed this in *Greendale (No. 3)* and *Bula (No. 6)*

“It follows from the foregoing judgments that the courts have an inherent jurisdiction to amend or set aside a final order in exceptional circumstances where those circumstances clearly establish that there has been a fundamental denial of justice through no fault of the parties concerned and where no other remedy, such as an appeal, is available to those parties.....I confine myself to saying that the exceptional circumstances which could give rise to the inherent jurisdiction of the court must constitute something extraneous going to the very root of the fair and constitutional administration of justice”

These principles were cited and upheld in *DPP v McKevitt* where Murray CJ stated the importance of protecting Constitutional rights and ensuring justice is not denied in court. This was reaffirmed in *Murphy V Gilligan* where Dunne J. stated that “constitutional justice” or the vindicating or protecting of a Constitutional right were the factors in setting aside a Supreme Court judgment.

Some other relevant case-law was summarised in the judgment delivered in *P -v- P*, The Supreme

Court, Unreported, 31st July 2001 in the following terms:

"Constitutional considerations:"

The authors of *Delany and McGrath on Civil Procedure* (4th ed., Round Hall, 2018) observed at para. 25.90: "These cases will be rare and tend to relate to a situation where a constitutional right is at stake and it will be necessary for the court to act to protect it."

The **Greendale case** is very similar to our case. We were never given an opportunity to present and argue the substantive issue in our court case that being informed consent and the Precautionary Principle. Twomey J. blocked all court hearings on this while presuming to make a judgment and orders about it. And he completely biased, prejudged and prejudiced any possible future hearings of the court case. And the Supreme Court held no court hearings for the appeal and the substantive issue in our court case that being informed consent and the Precautionary Principle, the but made a judgment. This has many of the characteristics of the Greendale case. The point here is that court judgments have been made about matters of which there were no full court hearings, that being informed consent and the Precautionary Principle which was the whole purpose of the court case, the only substantive issues in it. This is a clear breach of articles 40 and 38 of the Irish Constitution and the legal principle of fair procedures, fair hearing, due process, audi alteram partem, and breach of articles 6, 3, 5, 7, 8, 13, 14 and 17 of the European Convention on Human Rights and other laws cited in Point 1 of our Grounding affidavit.

There have been serious breaches of the Constitutional rights of the Plaintiffs in the High Court case itself and in the denial of a Supreme Court appeal and hearing. These are detailed in this document and in points 1 to 29 in our Grounding Affidavit. These breaches of the Constitutional rights of the Plaintiffs had a domino effect which has led to further breaches of the Irish Constitution in relation to the 21,000 or more men, women and children who were NOT given full disclosure about the covid19 vaccines and did NOT give their informed consent for these vaccines and vaccinations and who were injured, made ill, disabled or suffered premature death or "sudden death" from these covid19 vaccinations. Our court case and pleadings were about providing full disclosure about the vaccines to the people of Ireland and getting full informed consent from the people and vaccine recipients in accordance with law and the Irish Constitution and application of the Precautionary Principle under EU law and Irish law, but Twomey J. blocked and stopped full court hearing on this.

The denial of full informed consent and non application of the Precautionary Principle has led to massive harm, loss, injury and death by the covid19 vaccines to thousands of Irish people, and this was an outrageous abuse and breach of the Constitutional rights and human rights of the Irish people and a very significant breach of articles 40 to 44 of the Irish Constitution. This has afflicted Learned Irish

judges of the Irish courts and their families, friends and relatives and officers of the court encompassing solicitors and barristers and their families. Twomey J. wrongly presumed this to be so called “conspiracy theories” in his defective and erroneous judgments and orders. Official government documents and evidence in Ireland and other countries and over 3,400 published scientific studies from around the world and prima facie and irrefutable evidence from official sources and primary sources detailed in our grounding affidavit completely contradicts Twomey J. rendering his judgments and orders false, defective and erroneous. Twomey J. shares vicarious liability for the harm and damage caused to the Irish people, and for breach of their Constitutional rights.

There was a breach of fair procedures which are guaranteed under the Irish Constitution in our High Court case and Supreme Court case. This is another ground for “most exceptional circumstances” as found by Murray J. in LP V MP. The grounds for bias in the judgments and orders of Twomey J are laid out in our Grounding Affidavit. In support of our application I cite the precedent of Kenny V Trinity College Dublin where Fennelly J found that bias could prevent a fair and impartial hearing and judgment and cause a breach one’s Constitutional rights, and thus form a ground for setting aside or rescinding a judgment and order.

I rely on and cite the important precedent of KYPRIANOU v. CYPRUS set in the European Court of Human Rights which is relevant here to our case. In that case, a national court verdict was overturned due to absence of a fair trial and breach of ECHR rights. I also cite Goldberg V Kelly 1970 in the US Supreme Court where fair hearings and fair procedures were found to be axiomatic and self evident. In Williams v. Pennsylvania, (2016) 579 U.S. argued in the US Supreme Court a judge was forced to recuse himself due to bias. Bias itself can and has acted to deprive us of fair hearings, due process and fair procedures.

The aforementioned precedents in the Supreme Court and superior courts and in the European Courts in addition to the breaches of the Irish Constitution, EU law and international human rights law binds the hands of the Supreme Court judges in this court case in respect of setting aside or overturning the judgments and orders of Twomey J. and that this provides valid grounds for rescinding the Supreme Court judgment which relied on the judgments and orders of Twomey J.

2. Judgments and Orders which were reliant on fraud are null and void in law. There are twenty five Counts of Fraud. Grounds for “Exceptional Circumstances” and grounds for setting aside or overturning these court judgments and orders

We intending to apply to the Court to vary or rescind a final judgment or order made by the Court (in this practice direction “intending applicant”) bear a very heavy onus of establishing that such circumstances exist. And the most exceptional circumstances exist as stated in the Points in this document and in the grounding affidavit.

We the Plaintiffs plead fraud to the Supreme Court under Order 19, section 5, subsection 2 of the Superior Court Rules which states the following

‘ (2) In all cases alleging misrepresentation, fraud, breach of trust, wilful default or undue influence and in all other cases in which particulars may be necessary, particulars (with dates and items if necessary) shall be set out in the pleadings. ’

The Judgments and Orders of Twomey J. were reliant on Fraud and as a result have become based on Fraud. The hasty judgment of the Supreme Court without court hearings relied on the judgments and orders of Twomey J. which relied on fraud and were tainted by fraud have also become tainted by fraud. Historically in the Irish courts since 1922 and in the centuries prior to 1922 including back to Brehon law times in Ireland, fraud has been Grounds for declaring judgments and orders and proceedings null and void in law.

This qualifies as “most exceptional circumstances” in terms of this SC19 application to the Supreme Court and in terms of the precedents set in the Supreme Court in this matter and precedents set in the superior courts of other jurisdictions and countries which have been relied upon by Irish Superior Court judges in the past. These will be detailed below.

The ingredients of fraud are all present in this Court case

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

There are several counts of fraud being pleaded in this court case.

The first and most serious count of fraud is Judge Michael Twomey’s use of and reliance on a fraudulent instrument in a judgment in July 2023 to support his assertion that the courts were fully, legally and lawfully commenced in 1924 including the commencement orders signed and sealed in 1924. The evidence from the Irish government archives, Royal Mint in England, and British government

archives shows that this was NOT the case. This is the subject of ongoing court proceedings by Patrick Clohessy in the Court of Appeal and Supreme Court in Ireland. This is very serious and renders the judgments and orders of Twomey J. reliant on fraud and thus defective and in error and ultra vires and thus null and void in law. Indeed fraud makes these judgments and orders null and void ab initio. **Point 19 in our Grounding Affidavit** further elucidates this point and also **Point 29 of this document** or Motion further elucidates this point.

This fraud is both a breach of the civil law and the criminal law. This fraud may have resulted from a mistake or error made by Twomey J. but the net effect of this fraud is very serious for the Plaintiffs, the Defendants, the Judiciary, the legal system, and the people of Ireland as cited in article 6 of the Irish Constitution.

In support of this, rely on many precedents regarding fraud, some cited here and some cited later in the document and how fraud makes judgments, orders and proceedings null and void in law. This is in our **Book of Authorities – Fraudulent Seals** and our **Book of Authorities – Void Proceedings and Void Judgments** and **Book of Authorities for Fraud**.

There are other counts of fraud in this case, detailed below and in the grounding affidavit and these frauds were relied upon by Twomey J. and by the Defendants. This makes the judgements and orders reliant on fraud and some of the Defendants pleadings reliant on fraud. Fraud whether deliberate or accidental is still fraud.

The second count of fraud is Twomey J. relied on the Ministers and Secretaries Act 1924 in his judgments and orders and the defendants also relied on the Ministers and Secretaries Act 1924. We seek an Order / Declaration from the Supreme Court on the Ministers and Secretaries Act 1924 which was never sealed by the Irish Government and not fully commenced in 1924. We have prima facie evidence to show that the Ministers and Secretaries Act 1924 was not validly commenced and enforced on the 2nd June 1924 pursuant to Section 20 of the Act by affixing the Executive Council Seal as was required pursuant to section 16 of the same Act. It breached the sections and terms of its own Act. This means the law was not fully enacted and is invalid.

The Ministers and Secretaries Act 1924 is voided due to these administrative irregularities of non-compliance with Sections 1, 2, 13, 15, 16, 20 in regard to its unenforced commencement or non-commencement. On the 2nd June 1924, the Ministers and Secretaries Act 1924 was not properly commenced pursuant to its own terms, and not enforced, due to the FACT that it does not have the Executive Council Seal affixed to the Original purported valid document, as was required pursuant to Sections 15 & 16 of the Act. The Executive Council Seal was received by the Free State government in March 1926 according to official Irish government documents and Royal Mint archives. The Ministers and Secretaries Act 1924 could not have been sealed and signed in 1924 as required by law as it was not created

and not in existence then and nobody bothered to seal it after March 1926. This was extraordinary incompetence by the Irish government and civil service at the time.

The Legal Services Regulation Act 2015 and the laws and Statutory Instruments governing Costs and the Costs Rule are all invalid, unlawful, illegal and unconstitutional as the Minister did not have the legal power and authority under the invalid Ministers and Secretaries Act 1924 to sign them into law. Furthermore, the unsealed, un-commenced and invalid Ministers and Secretaries Act 1924 was not inherited under articles 50 and 56 of the Irish Constitution and it was and still is inconsistent with the Irish Constitution and is in breach of articles 50 and 56 of the Irish Constitution and is also in breach of article 15.4 of the Irish Constitution by virtue of the fact that the Oireachtas accepted as law an invalid, unlawful and unconstitutional law. In support of this Motion I quote article 50 of the Irish Constitution below:

‘ 1. Subject to this Constitution and to the extent to which they are not inconsistent therewith, the laws in force in Saorstát Éireann immediately prior to the date of the coming into operation of this Constitution shall continue to be of full force and effect until the same or any of them shall have been repealed or amended by enactment of the Oireachtas.’

In support of this Motion I quote article 15.4 of the Irish Constitution below:

‘ 4 1° The Oireachtas shall not enact any law which is in any respect repugnant to this Constitution or any provision thereof.

2° Every law enacted by the Oireachtas which is in any respect repugnant to this Constitution or to any provision thereof, shall, but to the extent only of such repugnancy, be invalid.’

These breaches of the Irish Constitution have led to other breaches including breach of article 49 of the Irish Constitution which led to a breach of article 28 of the Irish Constitution. It also breached the 1922 Irish Free State Constitution. As the 1937 Irish Constitution repealed and replaced the 1922 Irish Free State Constitution, this takes precedence in terms of declaring the Ministers and Secretaries Act 1924 null and void ab initio. The point here is that there were breaches of both Constitutions.

There is also a breach of the ‘Presumption of Constitutionality’. In support of this assertion, and this Order and Motion, I cite the important Supreme Court precedent of *Norris V Attorney General* 1984 where the Chief Justice stated that any pre-Constitution law which was inconsistent with the Irish Constitution or any post-Constitution law which was a breach of the Irish Constitution can be struck down and ruled invalid by the court. This certainly applies in our case. There is no automatic Presumption of Constitutionality for all laws, and the facts and evidence pertaining to a given law need to be examined by the court before a ruling on Constitutionality can be given. We cite the precedent of *Murphy V Attorney General* 1982 in the Supreme Court where a law was struck down and deemed invalid for breaching the Irish Constitution. I quote the Honourable and Learned Henchy J. in *Murphy V Attorney General* 1982:

“Such a declaration under article 50, s.1 amounts to a judicial death certificate, with the date of death stated as the date when the Constitution came into operation”

We also rely on and cite the precedents of *M V An Bord Uchtala* 1975, *Quinn V Ryan* 1965, *Sheerin V Kennedy* 1966, *McMahon V Attorney General* 1972, *Crotty V An Taoiseach* 1987. Other precedents elucidate the nature of this presumption of constitutionality which may or may not exist in given cases, *Ryan V Attorney General* 1965, *Blake V Attorney General*, *Brennan V Attorney General*, *Garvey V Ireland* 1981, *King V Attorney General* 1981, *Goodman International V Hamilton* 1992, *McGimpsey V Ireland* 1988. These precedents support our case and Motion.

This means no Minister for the last 100 years has been possessed of Official legal power to make Orders, Rules, Regulations, Statutory Instruments, or even sign international treaties on behalf of the Irish State as Constitutionally defined. This means that Irish government ministers had no power to sign laws and statutory instruments since 1924. This created fatal legal defects and infirmities in those laws and statutory instruments signed by government ministers since 1924, and this means that laws and statutory instruments have not been fully enacted and commenced and have been invalid, illegal and unlawful and unconstitutional since 1924. Furthermore those Acts and law and statutory instruments which were and are reliant on the Ministers and Secretaries 1924 are also defective in law

This same defective law provides for corporation soles to protect government ministers and give them legal immunity including immunity in their personal capacity. This failure of the law to fully enact and its invalidity means individuals become liable in their personal capacity. It also affects the legal standing or the locus standi of the Defendants in this court case. This also means that this particular law was not inherited and passed on under articles 50 and 58 of the Irish Constitution.

I refer the Supreme Court to **Exhibit Ministers and Secretaries Act** which is a Folder on the usb memory stick and contains pages 300 and 301 from the 1922-24 Cabinet Minutes of the Executive Council of the Irish Free state government, which show entry in regard to the proposed bringing into operation of the Ministers and Secretaries Act 1924 on the 2nd June 1924. This is from the National Archives, and it clearly shows the Commencement Order no. 4 and that it is not in compliance with section 16 of that same Act because it is not affixed with the Executive Council Seal that was not made until March 1926 apart from the other necessary particulars delivered hand dated endorsement. This shows an unsealed, undated by hand and uncommenced commencement order. What this means is no Minister for the last nearly 100 years has been possessed of Official legal power to make Orders, Rules, Regulations, Statutory Instruments, or even sign international treaties on behalf of the Irish State as Constitutionally defined.

This means government Ministers have no lawful power for nearly 100 years to make Orders, Rules, Regulations, Statutory Instruments, etc. etc. This also affects Registrars of the Courts Service pursuant to the Definitions in section 2 of the Court Officers Act 1926 as amended, and the Courts Service Act 1998 as amended, which are dependent on power from the invalid unenforced Courts of Justice Act 1924. This means Court Officers have no power to issue Summonses, Motions, Orders, or demand payment of Fees

for any of those documents, or any other Court document.

The Ministers and Secretaries Act 1924 was relied upon by Twomey J. in his judgments and orders in this the High Court case. This created fatal defects and flaws in the judgments and orders of Twomey J.

On these grounds of fraud, we seek an Order / Declaration overturning the judgments and orders of Twomey J. based on his reliance on the Ministers and Secretaries Act 1924. And on these same grounds, we seek an Order / Declaration Court removing the Costs rule and the corporation sole protections for the Defendants and for all government ministers and civil servants. These judgments and orders we seek being based on uncommenced, unsealed and invalid and unlawful law which is null and void in law and inconsistent with the Irish Constitution and unconstitutional.#

We also seek an Order / Declaration on the Champerty and Maintenance which occurred in this court case. As stated above, the Ministers and Secretaries Act 1924 was never sealed with the government stamp. This has removed corporation sole protection and legal immunity protection for individual men and women working as government ministers, TD's, the CMO, and the head of the HSE. This means they had no legal right to rely on taxpayer's money to fund their court case. Money from the Irish taxpayers, a third party, was used to fund the Defendant's court case. This is clearly champerty and maintenance. Irish taxpayers funded a court case which denied them full informed consent for covid19 vaccinations and denied them the protection of the Precautionary Principle in EU law and Irish law and denied the injuries, illnesses, disabilities and deaths caused by the covid19 vaccinations and denies them financial compensation for the injuries, illnesses, disabilities and deaths caused by the covid19 vaccinations. This is a combination of champerty and maintenance combined with obtaining money under false pretences and fraud which has led to loss, harm and injury to thousands of Irish people. This requires full adjudication in the Supreme Court and criminal courts.

Furthermore the Legal Services Regulation Act 2015 relied upon the uncommenced, invalid and fraudulently sealed and signed Courts of Justice Act 1924 (See Point 19 in the Grounding Affidavit) and the unsealed and uncommenced Ministers and Secretaries Act 1924 creating fatal legal infirmities and defects in the Legal Services Regulation Act 2015. This invalidates this Act of 2015 and invalidates the costs in this court and other court cases.

The non sealing and non commencement of the Ministers and Secretaries Act 1924 meant the President of the Executive Council, WT Cosgrave had no power to commence the Courts of Justice Act 1924. This created serious legal infirmities and defects in the Courts of Justice Act 1924 and the statutory courts. This along with the other legal infirmities and defects detailed in Point 19 of our grounding affidavit had the effect of making the judgments and orders of Twomey J. defective, flawed, fraudulent and null and void in law.

In June 2024, Patrick Clohessy issued a Legal Constructive Notice to the Irish Government, the Irish Courts Service and the Irish Judiciary and the European Union authorities concerning the illegality,

unlawfulness, invalidity and unconstitutionality of the statutory Irish courts and Courts of Justice Act 1924 and the non sealing and non commencement of the Ministers and Secretaries Act 1924 and the accompanying breaches of the Irish Constitution caused by these legal infirmities and defects which invalidated the 1961 Courts (supplemental provisions) Act, and the Courts (Establishment and Constitution) Act 1961. Furthermore the 1961 Courts (supplemental provisions) Act, and the Courts (Establishment and Constitution) Act 1961 are also invalid because Taoiseach Sean Lemass had no power under the invalid and unsealed and uncommenced Ministers and Secretaries Act 1924 to sign or give force of law to the Statutory instrument no. 217 of 1961. And the Acts in 1961 relied upon the uncommenced, invalid and fraudulently sealed and signed Courts of Justice Act 1924 and unsealed and uncommenced Ministers and Secretaries Act 1924 creating fatal legal infirmities and defects in these Acts in 1961. I refer the Supreme Court to **Exhibit Notice to the Government and Courts**.

I refer to **Exhibit Effects of non commencement of the Courts of Justice Act 1924 and Ministers and Secretaries Act 1924 and the non sealing of the latter**.

The third count of fraud relates to the obtaining of Informed Consent by Non Disclosure, False Pretences, Fraudulent Misrepresentation, Deception and Fraud. This led to both financial losses and human health losses for thousands of Irish people in Ireland with many people becoming seriously ill, disabled or suffering premature death caused by these covid19 vaccines.

This specifically involves the Defendants committing fraud against the people of Ireland by NOT giving them full disclosure about covid19 vaccine injuries, illnesses, disabilities and deaths, and other material and important information about the vaccines including dangerous contaminants, and the concealing and hiding information about this from the people of Ireland and vaccinees, and depriving them of informed consent and the benefit, protection and relief of the Precautionary Principle under EU law and Irish law, while claiming the vaccines were “safe and effective” to the people of Ireland. This is further elucidated in Point 2 of our grounding affidavit for this Motion and in the prior affidavits and exhibits we filed in the High Court. This was a clear case of fraud and fraudulent misrepresentation, and it unfortunately led to at least 21,000 injuries, illnesses, disabilities and deaths in Ireland. By May 2024, VAERS of CDC reported that the covid19 vaccines had killed 37,647 people and injured 1.6 million people in the USA. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit VAERS 2024**. By February 2023, Eudravigilance of the European Medicines Agency in Europe reported that the covid19 vaccines had killed over 50,000 people and injured over 5 million people. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit Eudravigilance 2024**.

The Defendants and Irish government and health authorities and Pfizer all claimed and still claim that the covid19 vaccines are “safe and effective” yet this was untrue as

(a) the medium term safety and long term safety of the vaccine was never established and unknown

according to Pfizer and other vaccine companies and scientists and scientific studies

(b) the vaccine was in Phase 3 trial until mid 2023

(c) massive amounts of scientific, medical, autopsy, government database, and statistical data from around the world including Pfizer's own internal documents released under a Federal Court order showed these vaccines were not safe and not effective.

(d) the government censored the facts and evidence about the covid19 vaccines and this censorship was imposed in the press and media and in the Medical Council and on many social media platforms online.

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

The legal protections of informed consent and the Precautionary Principle were NOT applied by the Defendants to protect the people of Ireland. Indeed fraud was used to deny these same legal protections and deceive the people of Ireland. The facts show that Informed Consent was obtained by Non Disclosure, False Pretences, Fraudulent Misrepresentation, Deception and Fraud. This fraud led to harm, loss and injury and in some cases death to many thousands of living men, women and children in Ireland and this carries both civil liability such as is being argued in our court case and criminal liability. This has led to many thousands of Irish people suffering in silence today enduring illness, poverty, hardships and experiencing neglect, no compensation, fob offs, gaslighting, denigration and mockery by the Defendants, the government, state bodies and civil servants and the medical profession. The facts shown that the Precautionary Principle was deliberately not applied and that this amounted to further fraud committed against the unsuspecting public.

In support of this first count of fraud, I present internal documents from Pfizer released under federal court order in the USA in 2022 :

Exhibit 1 which is the 9 pages from Pfizer was available since **December 20th 2020** and also available to the FDA, CDC and NIH in the USA and the EMA in Europe and HPRA and NIAC in Ireland at that time. The HPRA in Ireland share information and databases with the EMA, the CDC, FDA and NIH. This was NOT disclosed to the general public and vaccine recipients in Ireland and other countries. Yet they told the general public that the vaccine was "safe and effective".

By December 20th 2020, the following could have been done to protect the public :

(a) vaccine withdrawn and results publicly revealed

(b) vaccine suspended and more detailed safety studies carried out over 12 months or more and results publicly revealed. This would comply with the Precautionary Principle in EU law and Irish law.

(c) revealed the dangers and risks of the covid19 vaccines to the general public
This was not done.

In the High Court hearing on March 10th 2023, we presented evidence **Exhibit 1** titled

‘5.3.6 Cumulative Analysis of Post-authorization Adverse Event Reports’

which is Pfizer’s own internal documents from it’s covid19 vaccine trial in 2020 and its post authorisation monitoring reports, personally to the Judge in the High Court. He received it and looked at it in court. It was 9 pages from Pfizer’s own internal documents about the covid19 vaccine which were released under Federal Court order in the USA. These pages listed **over 1,100 serious illnesses, disabilities and type of death caused by the covid19 vaccine**. Some of these types of death and disability are truly horrible and no Irish child should be subject to these types of death and disability. And indeed no Irish person or human being should be subject to these types of death and disability. We had a legal, Constitutional, ethical, moral and human rights duty to bring this into court and have it heard in court in full hearings. This information was from Pfizer itself and was Prima Facie evidence and Pfizer have publicly acknowledged this.

Exhibit 2 which is the deaths, serious illnesses, and disabilities caused by the vaccine during mass covid19 vaccinations within the first 90 days of mass covid19 vaccinations was known to the FDA, CDC and NIH in the USA and the EMA in Europe and HPRA and NIAC in Ireland by **March 1, 2021**, which was 90 days after December 1, 2020. The HPRA in Ireland share information and databases with the EMA, the CDC, FDA and NIH. All of these parties had this information about the vaccine including dangers to pregnant women and their unborn children and infants by **March 1 2021**. This important and material information was NOT disclosed to the general public and vaccine recipients in Ireland and other countries. Yet they told the general public that the vaccine was “safe and effective”.

We also handed **Exhibit 2** which is Pfizer’s own internal documents from it’s covid19 vaccine trial in 2020 to the Judge which was another Pfizer internal document released under Federal Court order in the USA in January 2022. This shows 158,893 adverse events and 42,086 case reports from its COVID-19 vaccine, and 1,223 people had died and 25,000 people suffered nervous system disorders, 8,800 suffered respiratory disorders, 17,000 suffered gastrointestinal disorders, and over 42,000 people had suffered injuries, disabilities and illnesses caused by the vaccine within the first 90 days of the vaccine being given to the general public. This was a massive number of deaths and illnesses and disabilities inside a short space of time. These Exhibits and Prima Facie evidence were ignored by the Judge in his judgments, and he referred to them as “conspiracy theories”. This was a disgraceful abuse of the judicial process and has brought the courts and the administration of justice into disrepute in Ireland.

By March 1, 2021, the following could have been done to protect the public :

- (a) vaccine withdrawn and results publicly revealed
- (b) vaccine suspended and more detailed safety studies carried out over 12 months or more and results publicly revealed. This would comply with the Precautionary Principle in EU law and Irish law.
- (c) revealed the dangers and risks of the covid19 vaccines to the general public

This was not done.

I have attached **Exhibit 1 and Exhibit 2** to this document on a USB MEMORY STICK for presentation to the Supreme Court.

Exhibit Pfizer Confidential is the entire Pfizer document

Exhibit 3 is the Federal Court order from the USA dated 6th January 2022

Exhibit 3a is the Federal Court order from the USA dated May 9th 2023

are two important federal Court orders in the USA demanding the release of these Pfizer documents relating to the covid19 vaccine trial data and the post trial data. This information was meant to be hidden forever from the general public. And the FDA attempted to hide this information from the public for 55 years in this court case, but this was rejected by the court. These Pfizer documents and related FDA, CDC, EMA and NIH documents released under Federal Court orders in the USA provide most of the evidence for our case in the High Court and the Supreme Court and for the European Courts.

The fact that Pfizer and the Regulators hid and tried to continue hiding this information about the vaccine from the public clearly shows that there was no full disclosure and no informed consent for these covid19 vaccinations.

Furthermore, Pfizer used confidentiality agreements to conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine. Pfizer has kept data hidden through confidentiality agreements with governments around the world including the Irish government and EU government. Pfizer used its confidentiality agreements with the United States government and other governments including Irish and EU governments to conceal, suppress, and omit material facts relating to Pfizer's COVID-19 vaccine, including the safety and efficacy of the vaccine. Pfizer also used an extended study timeline to conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine. Throughout 2021 and 2022 and 2023 Pfizer executives publicly lied about the covid19 vaccines, and the regulators and governments and state bodies relied on these lies and fraud and promoted these lies and fraud. They acted like parrots parroting the Pfizer message of "safe and effective" to deceive the general public and vaccine recipients. There was no effective oversight, regulation and protection of the public.

I refer to **Exhibit Kansas Court** which is evidence being used in similar court proceedings in the USA in

2024.

Pfizer was receiving so many adverse event reports about the vaccine that it had to hire 600 additional full-time staff and expected to hire more than 1,800 additional resources by June 2021.

Further corroboration of this fraud is the testimony of Dr. Renata Moon a medical doctor and Professor of Medicine in the USA to the US Senate where she stated that the information leaflet for the covid19 vaccine was blank and there was no listing of the adverse events and risks for the covid19 vaccination. She used this to show that there was NO informed consent for these vaccines. This was presented to the High Court but ignored by Twomey J. This is **Exhibit 9** for Irish Supreme Court which is a video of US Senate hearings on this issue.

Evidence presented in an ongoing court case in Kansas in the USA titled 'State of Kansas VS Pfizer' in 2024 shows that Pfizer and the Regulators including the FDA in the USA, the EMA in Europe and the HPRA in Ireland all knew that the covid19 vaccines were causing serious illnesses, disabilities and deaths from March 1st 2021 onwards. The Plaintiff's sworn affidavit and submissions to the court in Kansas provide a large amount of prima facie evidence of this, some of it from Pfizer, including dates and sources. I refer to **Exhibit US Court 4**. I would ask the Supreme Court Judges to read the long list of incriminating evidence. This corroborates the evidence we provided to the High Court and now to the Supreme Court. This proves fraud, as Pfizer and the Regulators including the FDA in the USA, the EMA in Europe and the HPRA in Ireland were falsely claiming that the vaccines were "safe and effective" at that time and after it and up to the present day. This fraud undermined, blocked and denied informed consent for the covid19 vaccinations.

This fraud meant that there was NO informed consent for these vaccines.

In addition to our grounding affidavit, our **Exhibit Statement of Truth** corroborate the facts and evidence in our grounding affidavit and Motion for the Supreme Court. And corroborate the breach of Informed consent and the Precautionary Principle which were the sole basis of our court case and proceedings. And corroborate the twenty five counts of fraud stated in the Motion and the breaches of the Irish Constitution and Irish Constitutional rights and breaches of ECHR rights and EU Charter of Fundamental rights and international human rights stated in the Motion and breaches of EU law and Irish law stated in the Motion. To further corroborate our pleading of fraud, I refer to a District Court case in Helsinki Finland which was being heard in April 2024, details are below:

Mika Vauhkala v Fazer restaurant, Finland and the Finish Government

Record number: 706 / 2022 / 1504

District Court Helsinki

Court Hearings: 2023 and 2024

The Expert Witness Testimony in this court case of Dr. Aseem Malhotra, a top Cardiologist with over 20 years experience in Britain and abroad to the District Court in Helsinki, Finland on April 12th 2024 corroborates and confirms our evidence about the covid19 vaccines given to the High Court and the

Supreme Court. We have a transcript of his testimony in court. This is **Exhibit Malhotra** which is a folder on the USB memory stick . This testimony in court in Finland is available to the public on the Internet at <https://makismd.substack.com/p/video-draseem-malhotra-testifies> and details of the court case and litigants is at <https://casecovidpass.com/> and at <https://www.aussie17.com/p/dr-aseem-malhotras-explosive-court>

I draw the attention of the Irish Supreme Court to the Expert Witness Testimony of Dr. Aseem Malhotra, a top Cardiologist with over 20 years experience in Britain and abroad to a District Court in Helsinki, Finland on April 12th 2024 which fully corroborates and confirms our evidence about the covid19 vaccines given to the High Court and the Supreme Court. We have a transcript of his testimony in court. This is **Exhibit Malhotra** which is a folder on the USB memory stick . This testimony in court in Finland is available to the public on the Internet at <https://makismd.substack.com/p/video-draseem-malhotra-testifies> and details of the court case and litigants is at <https://casecovidpass.com/> and at <https://www.aussie17.com/p/dr-aseem-malhotras-explosive-court>

This testimony Dr. Aseem Malhotra included the following statement in court

“The conclusions of that paper were really very disturbing. The original trials that led to the drug regulatory approval of these vaccines revealed that you were more likely to suffer serious harm from taking the vaccine, specifically hospitalization, life changing event or disability, than you were to be hospitalized with COVID **That rate of harm at two months was very high at 1 in 800.**”

These facts were not disclosed to the general public and to vaccine recipients.

I refer the Honourable and Learned Judges of the Supreme Court to Point 2 of our grounding affidavit showing exactly and precisely why informed consent was not given for the covid19 vaccinations and why the Precautionary Principle under EU law and Irish law was not applied. And evidence is provided to back this up, in the form of our exhibits, sworn affidavits and submissions.

In consideration of these facts and evidence, I now ask the Honourable and Learned Judges of the Supreme Court the following question :

How can any living man, woman or child give their informed consent if they are not informed ?

The answer is obvious to all. And this exposes and clarifies the fraud.

The breaches of Informed Consent and the Precautionary Principle in EU law and Irish law in our court case is serious and the fact that fraud was used to do this makes this a matter of the utmost seriousness for the Supreme Court. We rely on the precedents for Informed Consent and the Precautionary Principle stated in our **Book of Authorities for Informed Consent** and **Book of Authorities for the Precautionary Principle**. These precedents were set in the Superior Courts in Ireland and in the European Courts and in

other jurisdictions and they bind the Supreme Court judges in this case before the Supreme Court.

Excess Mortality

These breaches of informed consent and the Precautionary Principle have had dire consequences for the people of Ireland. In our grounding affidavit and exhibits for the Supreme Court and in previously filed affidavits and exhibits in the High Court we provided prima facie evidence from official government sources and scientific studies showing a sudden, unexpected, and massive increase in excess mortality since mass covid19 vaccinations began in mid January 2021. Since covid19 vaccinations began in Ireland, official statistics show a figure of 18,000 excess deaths by June 2024.

The Defendants relied on this fraud in our court case. The judgment and orders were obtained by fraud and are tainted by fraud. This fraud is further elucidated in the Grounding affidavit. Twomey J. in his judgments and orders relied on this fraud and this makes his judgments and orders null and void in law.

The fourth count of fraud is the Defendants claimed the covid19 vaccine stopped transmission of the virus which was the basis for the vaccine passports and vaccine apartheid in Ireland implemented by the Defendants. They deceived the general public about these vaccines and used False Pretences such as “safe and effective” and “stops transmission of the virus” and “stops spread of the virus” and “prevents infection”. These statements have been proven to be false and are now widely accepted as being false. At the same time the government and health authorities were parroting the term “safe and effective” for these vaccines, they knew that the evidence showed that this was not the case.

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

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

This false information provided to the Irish public was used to implement vaccine passports, vaccine apartheid, discrimination, vaccine mandates in some workplaces, and coercion, manipulation, use of the police powers of the state to enforce the fraudulent vaccine apartheid and breaches of the Irish Constitution and international human rights. This fraud was stated by us to the High Court and Supreme Court and is further elucidated in our grounding affidavit for this Motion and our **Book of Authorities for Fraud**.

Twomey J in his judgments and orders relied on this fraud of the Defendants in his judgments and orders, and this makes his judgments and orders null and void in law.

This fraud was exposed by Janine Small, the Pfizer executive in the European Parliament on October 11th 2022, where she stated that the covid19 vaccine had not been tested for stopping transmission. It was not proven to stop transmission. It did not stop transmission. We submitted this evidence to the High Court in

our affidavits, exhibits and submissions.

Evidence presented in an ongoing court case in Kansas in the USA titled 'State of Kansas VS Pfizer' in 2024 shows that Pfizer and the Regulators including the FDA in the USA, the EMA in Europe and the HPRA in Ireland all knew that the covid19 vaccines did not stop transmission. The Plaintiff's sworn affidavit and submissions to the court in Kansas provide a large amount of prima facie evidence of this, some of it from Pfizer, including dates and sources. I refer to **Exhibit US Court 4**. I would ask the Supreme Court Judges to read the long list of incriminating evidence. This corroborates the evidence we provided to the High Court and now to the Supreme Court. This proves fraud, as Pfizer and the Regulators and government and health authorities were falsely claiming that the vaccines stopped transmission and this was used as the basis for vaccine passports, vaccine apartheid and vaccine mandates in some workplaces. This fraud undermined, blocked and denied informed consent for the covid19 vaccinations. In support of this pleading of fraud, I refer to a landmark decision in the US Court of Appeals in June 2024 which overturned the famous Jacobson precedent which was in place for over one hundred years. And was cited in Irish courts, British courts and European courts. In Health Freedom Defence Fund and others VS Alberto Carvalho and others, the Honourable and Learned judges of the US Court of Appeals stated that the covid19 vaccines were a medical treatment at best and not vaccines as understood in the Jacobsen case, as the covid19 vaccines did NOT stop infection and transmission of the virus. This is a very important judgment with huge consequences for the USA and for Ireland and other countries. This judgment allows the case in a lower court, that is the US District Court, to proceed, involving the legality and Constitutionality of covid19 vaccine mandates.

I refer the Supreme Court judges to **Exhibit US Landmark Court Decision**

This has ramifications for our case, as the Defendants and Twomey J. claimed that the covid19 vaccines stopped infection and transmission and the judgments and orders of Twomey J relied on this. And the Supreme Court judgment relied on this fraud. I draw the court's attention to the statements of Janine Small, a top Pfizer executive to the EU Parliament stating that the covid19 vaccine did NOT stop transmission and infection. This was in our affidavits and submission to the High Court. We had prima facie evidence that the covid19 vaccines did not stop transmission but Twomey J. did not allow us to present this in court. The reliance of Twomey J. on false claims and fraud in relation to the covid19 vaccines in his judgments and orders created defects and flaws in his judgments and orders which render them null and void in law. The vaccine passports and vaccine discrimination and vaccine mandates in many workplaces in Ireland were based on these false claims and fraud and they seriously breached legal rights to informed consent, application of the Precautionary Principle and Irish Constitutional rights and international human rights. This breach of these same rights was the reason we took this court case and was the sole purpose of this court case.

The fifth count of fraud was the non disclosure by the Defendants and government of the vaccine's ingredients some of which were contaminants and very dangerous and toxic to human beings. This is detailed in Point 2 of our **Grounding Affidavit**, starting at page 60

The contaminants included dsRNA, foreign DNA, graphene oxide, ALC-0159 and ALC-315 and sv-40, a known cancer promoter, all of which are hazardous to human health. The presence of foreign DNA and mRNA in the vaccine which was delivered into the cells of the human body is particularly dangerous to human health, according to Dr. Joseph Ladapo, the Surgeon General of Florida in the USA. These dangerous contaminants were found by scientists in the vaccines and the findings have been published and the risks include cancers, including "turbo cancers" as defined by medical doctors and Oncologists, myocarditis, pericarditis, other heart illnesses, dangerous clotting, strokes, haemorrhages, autoimmune illnesses, liver illnesses, neurological illnesses, and other serious illnesses and diseases capable of killing a person. This is on a par with the Hepatitis C scandal and contamination of blood supplies in the past. These contaminants were NOT tested for safety prior to emergency authorisation of the covid19 vaccines and injecting them into the arms of the general public. Yet the Defendants claimed that the covid19 vaccines were "safe and effective", when the evidence shows that they were not safe. The fraud is obvious here. This fact has necessitated a call to the Blood banks of Ireland to screen for these contaminants in the Irish nation's blood supply.

I refer to **Exhibit Blood Transfusion Service** and **Exhibit Blood Transfusion Service 2** showing that I have notified the Irish Blood Transfusion Service about these serious risks to Ireland's blood supplies.

The sixth count of fraud was the non disclosure by the Defendants and government of the fact that Process 2 instead of Process 1 was used in vaccine manufacture and this was injected into people, and has had very serious adverse consequences for the vaccinated. The vaccine trial relied upon by regulators and governments used Process 1 not Process 2. Yet the untested and unauthorised Process 2 product and its contaminants was injected into members of the public. Process 2 produced a very different product to Process 1 and caused more serious adverse effects. This was and is a clear case of fraud. The regulators in Ireland and other countries know about this fraud but have been too scared or corrupted or disinterested or compromised to take legal actions in the courts.

The seventh count of fraud was the vaccine trial frauds. This fraud fatally undermined the vaccine in legal terms and scientific terms. This is detailed in our **Book of Authorities for Fraud** and in our grounding affidavit for the Motion and in the affidavits and exhibits given to the High Court, including Point 8 in our December 2022 affidavit submitted to the High Court and in **Exhibit Kansas Court**.

The eighth count of fraud was fraud committed by the Regulators including the HPRA, the EMA and the FDA. Regulator fraud is central in this court case as they are the gatekeepers, they are responsible for ensuring the public are fully informed so that informed consent can be given and ensuring the government

and parliament are fully informed and the public is fully protected. Their failures here are **material and important to this case**. This is detailed in points 1 to 29 in the grounding affidavit and our **Book of Authorities for Fraud** and in the following points below :

(i) As the covid19 vaccines caused large numbers of injuries, illnesses, disabilities and deaths in Ireland and worldwide from December 2020 onwards and which became known to the regulators and health officials and governments by March 2021, they refused to inform the general public about this. And refused to include this on Informed Consent forms given to vaccine recipients. This deliberate hiding of important and material information about the covid19 vaccines and the denial and blocking of Informed consent is detailed in Point 2 of our grounding affidavit.

(ii) authorised the Pfizer covid19 vaccine which used Process 1 in the trial but allowed Pfizer to sell, distribute and inject the covid19 vaccine which used Process 2. This Process 2 vaccine was untested and unauthorised by the Regulators. The Regulators were aware of this fraud and did nothing and became complicit in this fraud.

(iii) refused to properly investigate these injuries, illnesses, disabilities and deaths and establish how the vaccines were causing this. And refused to inform the general public and refused to publicly recommend a halt to the vaccinations.

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

For these covid19 vaccines there were

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

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

(v) EMA authorised the covid19 vaccines for emergency use by falsely claiming there was no alternative medicines to treat and cure covid19. We had evidence and expert witnesses for the court in the form of medical doctors who successfully treated thousands of covid19 patients with medical drugs and treatments from June 2020 onwards. Vaccine Emergency Authorisation was fraudulent on this basis.

(vi) refused to intervene and stop vaccinations in order to protect the public in 2021, 2022 and 2023 when it became clear that the vaccines were dangerous and causing high numbers of illnesses, disabilities and

deaths. Refused to use the Precautionary Principle in law.

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

(viii) refused to carry out independent and intensive electron microscope and spectroscopic investigations to establish all of the ingredients of the covid19 vaccines and publish a report for the general public. And refused to investigate vaccine quality. And refused to use microscopes and other technologies to analyse the blood of vaccinated and unvaccinated people to identify blood abnormalities.

(ix) refused to inspect manufacturing operations and quality control and GMP and identify defects, problems and frauds and produce reports

(x) refused to arrange or carry out autopsies on young vaccinated people who died shortly after getting the vaccination or “died suddenly” from no obvious cause.

(xi) lied about biodistribution of the mRNA in the human body. And did not bother to independently investigate the health risk of the wide biodistribution of the mRNA in the human body.

(xii) falsely claimed that the vaccine was safe for pregnant women. We provide scientific evidence that it harms pregnant women in our grounding affidavit.

(xiii) approving new, bivalent Pfizer and Moderna COVID-19 vaccines, without any human trials, which is unprecedented

(xiv) non disclosure of the conflicts of interest between Big Pharma and Regulator executives and the “revolving door” system and the fact that Regulators such as the EMA get most their funding from Big Pharma. This has facilitated wrong doing, corruption, and fraud in the past.

(xv) no safety audits of the EMA and HPRA

Yet the Regulators and government told the general public that the vaccines were “safe and effective”. This was fraud.

The ninth count of fraud was non disclosure by the Defendants and government of the lack of vaccine effectiveness and the immune priming and antibody dependent enhancement which occurred which made the covid19 vaccines ineffective. The proof of this fraud is their need for constant “boosters” to boost an immune system depleted by the immune priming and antibody dependent enhancement caused by the covid19 vaccines. A vicious circle which proved very lucrative for the vaccine companies. Yet a monstrous fraud perpetrated on the unsuspecting public.

The scientific evidence clearly shows that the covid19 vaccines were not effective. The Defendants and government and health authorities and state bodies told the public that covid19 vaccine induced immunity was superior to natural immunity and this was used to sell the vaccines. The scientific facts and evidence show the superiority of natural immunity over covid19 vaccine induced immunity.

To further clarify this fraud, Pfizer falsely claimed that the risk reduction was 95% but this is the relative

risk reduction and it is not the most accurate measure. Data from the Pfizer trial shows that the Absolute risk reduction is 0.84%, this is the most accurate measure of vaccine effectiveness. It reduces one's chance of getting covid19 by 0.84%. The general public was misled into believing that effectiveness was 95% when in reality it was 0.84%. This effectiveness of 0.84% is very small and does not justify mass vaccinations and vaccinations of young children where the risks of them developing serious injuries, illnesses, disabilities and death is significant.

All of the above is further elucidated in our grounding affidavit for this Motion and in our **Book of Authorities for Fraud** and in the affidavits and exhibits filed in the High Court in 202 and 2023 and in **Exhibit Kansas Court**.

The tenth count of fraud relates to autopsy evidence clearly showing that the covid19 vaccine kills people and is killing people and this was denied by the Defendants and Twomey J. in his judgments and orders. This deliberate denial, ignoring, blocking and rejection of autopsy evidence which was central to the court case in the judgments and orders of Twomey J. made a fraud out of the judgments and orders of Twomey J. In fact, Twomey J. called this autopsy evidence "conspiracy theories" in his judgment and orders and he mocked, denigrated, slandered and defamed the Plaintiffs in his judgments and orders for relying on this autopsy evidence in court and stating that that autopsies may be required in Ireland to determine if the covid19 vaccine caused a death or not and that this information was vital for the public and health authorities to know. By doing this, Twomey J. scandalised his own judgments and orders and scandalised the High Court.

Point 2 of our grounding affidavit provides information about these autopsy studies and scientific evidence. I cite one of the most important autopsy studies below:

A Systematic REVIEW of Autopsy findings in deaths after covid-19 vaccination
Hulscher et al. 2024

<https://www.sciencedirect.com/science/article/pii/S0379073824001968>

Results

We initially identified 678 studies and, after screening for our inclusion criteria, included 44 papers that contained 325 autopsy cases and one necropsy case. The mean age of death was 70.4 years.

The most implicated organ system among cases was the cardiovascular (49%), followed by hematological (17%), respiratory (11%), and multiple organ systems (7%). Three or more organ systems were affected in 21 cases.

The mean time from vaccination to death was 14.3 days. Most deaths occurred within a week from last vaccine administration.

A total of 240 deaths (73.9%) were independently adjudicated as directly due to or significantly contributed to by COVID-19 vaccination, of which the primary causes of death include sudden cardiac death (35%), pulmonary embolism (12.5%), myocardial infarction (12%), VITT (7.9%), myocarditis

(7.1%), multisystem inflammatory syndrome (4.6%), and cerebral hemorrhage (3.8%).

This paper was originally published in 2023

The eleventh count of fraud is very serious and carries the most shocking consequences in terms of children's lives. I refer to the flawed, defective and fraudulent Pfizer covid19 vaccine trial for children which was the basis for covid19 vaccinations of children in Ireland.

The report from the covid19 vaccine trial for children released on June 15th 2022 showed the following facts:

- (a) 3,000 of the 4,500 children dropped out of the trial. Two thirds of children dropped out of the trial and no explanation was given by Pfizer. This in itself was grounds for ending the trial and declaring it null and void.
- (b) more vaccinated children got covid19 than unvaccinated children. These covid19 infections occurred after the first dose, the second dose and third dose of the vaccine. This showed the vaccine was ineffective and had negative efficacy.
- (c) 11 vaccinated children got covid19 twice and 1 unvaccinated child got covid19 twice
- (d) Some of the vaccinated children needed to be hospitalised.
- (e) After six weeks the Placebo group was vaccinated. This breached trial protocols and safety controls and ethics.

I refer the court to **Exhibit Child Experiments** which is a folder on the USB stick.

None of this vaccine trial information was provided to the parents of children in the USA, Ireland and other countries. This information was deliberately hidden and withheld while the HPR, NIAC, HSE, CMO, NPHE and Department of Health publicly declared that these covid19 vaccines were "safe and effective" for children. This was reckless endangerment of children in Ireland and was a breach of the criminal law and civil law. This was particularly relevant to our High Court case and now the Supreme appeal.

There was NO informed consent for these vaccines.

The twelfth count of fraud involves lies and fraudulent claims that the covid19 vaccines were safe for pregnant women and their unborn babies. The Defendants, the Irish government and health authorities all made this false claim. I refer to **Exhibit HSE Pregnancy** which is a screenshot of the HSE web site promoting covid19 vaccines for pregnant women. In support of this plea of fraud, I refer the judges to **Exhibit Pregnancy** and to section **(i) Pregnancies** on page 105 of the grounding affidavit and **Exhibit Kansas Court** from page 24 onwards and **Exhibit Pfizer Book** and **Exhibit 15** and our **Book of Authorities for Fraud** which shows that by March 2021 Pfizer and the Regulators had documentary evidence that the covid19 vaccines were dangerous for pregnant women. Yet they concealed and hid this information from the general public and pregnant women. And Pfizer and the Regulators and the Defendants in this court case publicly recommended these vaccines for pregnant women and claimed they were "safe and effective" at this time and in 2022, 2023 and in 2024. This persistence in a fraud shows

intent. This shows deliberate and purposeful intent as defined in Irish Supreme Court precedents (see below).

This fraud led to loss, harm and injury for many pregnant women and their unborn babies and is adversely affecting future generations. In science and scientific trials this is viewed as a major crime or scientific crime. We provided evidence to the High Court and now the Supreme Court in the form of affidavits and exhibits and submissions showing a sudden and large decrease in the birth rate in highly vaccinated countries after mass covid19 vaccinations in Spring 2021. This collapse in birth rates is very revealing and disturbing.

This fraud in addition to being a criminal offence and a civil offence is disgusting, vile and reprehensible and deserves to be condemned by this Supreme Court and every court.

The thirteenth count of fraud involves vaccine batch fraud where there was a large amount of inconsistency in vaccine batches such this endangered the lives of vaccine recipients who got certain batches. Evidence has emerged that batches of the Pfizer covid19 vaccine differed widely in terms of ingredients and adverse effects. The result of this is that some batches of the covid19 vaccine caused serious illnesses or disabilities or deaths while others had moderate adverse effects causing minor illnesses and others had no adverse effects. There was large scale inconsistency in vaccine batches such that many batches were in reality a different product when compared with other batches. This was in our books of evidence. Some ethical hackers managed to hack the databases of vaccine companies and they put this evidence about bad batches on a web site at <https://www.howbadismybatch.com>. This was also exposed by the German and American lawyer Reiner Faelmich and shows that both Pfizer and Moderna were tracking and monitoring these bad batches. Under Irish and European law and under medical ethics, the vaccine batches should have all contained the same ingredients and had the same risk factors and the same consistency and the general public were led to believe that this was the case. But this was not the case and the general public were misled and lied to and a serious fraud has been committed. The net effect of this is fraud and obtaining the informed consent of people by fraud and deception, and the causing of harm, loss and injury to many vaccinated people.

In our Submissions delivered to the High Court in July 2023 we stated the following:

‘ In response to serious allegations denying vaccine injuries, illnesses, disabilities and deaths in the judgment on costs, I present the following scientific evidence showing that not all batches of the Pfizer covid19 vaccine were consistent, the same, safety checked, and quality controlled as required by law. Some batches of the Pfizer covid19 vaccine produced very serious adverse events leading to serious illnesses, disabilities and deaths, while other batches led to illnesses and disabilities, while other batches had no adverse events and behaved like a placebo. This has completely undermined the HSE, the Minister for Health and Department of Health and the Irish government and shows that the covid19 vaccines

were NOT safe and effective. Their false claim of “safe and effective” is proven to be a lie and this lie enticed many people in Ireland to get the covid19 vaccinations and made them vulnerable to these illnesses, disabilities and deaths, and the evidence from the HPRA in Ireland and other sources shows that thousands of people have been struck down with vaccine injuries, illnesses, disabilities and deaths. There has been no accountability by the HSE, the Minister for Health and Department of Health and the Irish government. This makes the costs judgment in error in fact, in law and in precedent and thus null and void in law.

I cite the published and peer reviewed scientific study below. **This is [Exhibit 560 for the court](#)**

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

Schmeling et al. 2023

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

The Graph from this scientific study showing three vaccinated groups is on page 122 of the grounding affidavit. It shows one batch with no adverse events (yellow line), another batch with a moderate level of serious adverse events (green line), and another batch with a very high level of serious adverse events including death (blue line)

There was no disclosure of this to the general public in Ireland and other countries. Vaccinated people did not give their full Informed Consent for this, as they were not informed. This is very sinister and is criminal

The fourteenth count of fraud the EMA in European Union and the HPRA in Ireland and NIAC in Ireland and the Irish government and health authorities all claiming that the lipid nanoparticles, mRNA and spike proteins remained at the injection site or in the arm, and were quickly eliminated from the body. The scientific and medical facts show this to be a lie and a fraud and that there was a wide distribution of mRNA in the human body, and this has been the main factor in the systemic inflammation in the body, illnesses, disabilities and deaths caused by the covid19 vaccines. And we cite and rely on scientific studies which show that they persist in the human body for months and years and possibly indefinitely.

I refer the Supreme Court to **Exhibit Biodistribution** which details this biodistribution of the vaccine and mRNA and contaminants throughout the human body. I also refer to Point 2 of our grounding affidavit and in our affidavits and exhibits filed in the High Court and in our **Book of Authorities for Fraud**

The fifteenth count of fraud involved involves fraud in the manufacturing of the vaccines. **Exhibit – Latypova** identifies frauds in the manufacturing, GMP, product quality, Regulator approvals and authorisations of the covid19 vaccines, and the defects and frauds in the covid19 vaccine trials.

The sixteenth count of fraud involves the fraudulent claim that the covid19 vaccine “saved millions of lives” or “saved lives”. The prima facie evidence including evidence from the vaccine trial shows that vaccinated people had higher all cause mortality than unvaccinated people. This is further elucidated in Point 2 of our grounding affidavit and Points 1 to 29 of our grounding affidavit and exhibits and in our affidavits, exhibits and submissions filed in the High Court and in our **Book of Causality**. The scientific, medical and statistical data from official government sources and scientific research worldwide confirms and corroborates our evidence given to the courts.

This is corroborated by two recent scientific papers :

A Critical Analysis of All-Cause Deaths during COVID-19 Vaccination in an Italian Province
Alessandria et al. 2024

<https://www.mdpi.com/2076-2607/12/7/1343>

In their multivariate analysis, the researchers found the risk of all-cause death to be higher for those vaccinated with one or two doses of the COVID-19 vaccine compared to the unvaccinated.

Differential Increases in Excess Mortality in the German Federal States During the COVID-19 Pandemic
Kuhbandner et al. 2024

https://blog.fdik.org/2024-03/state-comparism-researchgate_p.pdf

Being peer reviewed in 2024

The seventeenth count of fraud the fraudulent PCR tests and results and “cases” which were one of the main grounds for introducing the covid19 vaccines. The evidence shows a 97% false positive rate for the PCR test for covid19. And this PCR test fraud was used to promote fraudulent cases, fraudulent case rates and fraudulent Infection Fatality Rates so as to cause mass fear and apprehension in the public and an artificial demand for vaccines. This was detailed in our affidavits filed in the High Court in December 2022 and January 2023 and our **Book of Authorities for Fraud**. There are foreign court precedents and published scientific research to corroborate this fraud. The Defendants relied upon this fraud in court. Twomey J in his judgments and orders relied on this fraud in his judgments and orders, and this makes his judgments and orders null and void in law.

The eighteenth count of fraud involves the fraudulent denial and blocking and censoring of safe and effective medical drugs to treat and cure covid19 from June 2020 onwards. This fraud led to the EMA authorising the covid19 vaccines for emergency use as it was falsely claimed there was no alternative medicines to treat and cure covid19. We had expert witnesses for the court in the form of medical doctors

who successfully treated covid19 with these medical drugs. They had sworn affidavits and were prepared to testify in court. Twomey J blocked these hearings in court. Twomey J. relied on frauds in his judgments and orders while blocking expert witnesses from revealing the truth, the facts and the evidence in court. This was an abuse of the court and an abuse of the legal process by Twomey J.. The facts show that Twomey J erred in fact, in law, in precedent and in logic in his proceedings and judgments and orders and that his judgments and orders relied on fraud. This makes his judgments and orders null and void in law.

The nineteenth count of fraud involves the fraudulent death rates from covid19. The evidence we presented in affidavits to the court from the Central Statistics Office shows that over 96% of covid19 deaths were deaths from other serious illnesses. Most people who died had 2, 3, 4 or more serious illnesses capable of causing death and most were elderly and would have died at the time even if covid19 never existed. All were mislabelled as 'deaths from covid19'. These over inflated covid19 deaths were used to cause panic and fear in the Irish public and as one of the grounds to authorise the covid19 vaccines. The Defendants relied upon this fraud in court. Twomey J in his judgments and orders relied on this fraud in his judgments and orders, and this makes his judgments and orders null and void in law.

The twentieth count of fraud involves both fraud and extortion. Adults and children who were duped by the lies and frauds of the state and the Defendants in our case and were injured or made ill or disabled or died from these covid19 vaccines have to go to the High court and/or Supreme court to get justice and compensation and this can cost over 100,000 euros and this cost can be increased to over 200,000 euros if they lose the case and have to pay the Costs of state. The state who promoted the vaccines which caused the illnesses, disabilities and deaths represent the vaccines and vaccine makers in court, and can hire the best lawyers and barristers in the country and hire the top doctors, hospital consultants and scientists as expert witnesses to attack and destroy the people who are vaccine injured in court. The vaccine injured and ill and disabled have no realistic chance of winning such court cases and this is widely known. And, the vaccine injured and ill and disabled face the threat of losing their homes in such court cases. This means the state can injure, make ill, disable and cause deaths to many Irish people and if they try to get justice in the courts it will be extremely expensive and unaffordable and the state can use millions of euros of taxpayers money to defeat the vaccine injured and ill and disabled in court. And Costs can be used to extort the vaccine injured and ill and disabled. This has the characteristics of a fraud and extortion racket. This fraud and extortion racket is completely unfair and is unlawful, illegal, and deprives ordinary people of justice under law, and breaches the Irish Constitution, the EU Charter of Fundamental Rights and ECHR law and UN Human Rights law.

The twenty first count of fraud involves the judgments and orders of Twomey J which breached the Irish Constitution and Judicial Council Act 2019 and Judicial Regulations, Superior Court Rules, the Bangalore Principles and EU law and other laws cited in Point 1 in the Grounding Affidavit.

The twenty second count of fraud involves an abuse of court process and an abuse of legal process and an abuse of the courts by Twomey J. which defrauded the Plaintiffs and deprived them of a fair, impartial and unbiased hearing in court. This fraud is detailed in Point 1 and in Points 1 to 29 in our Grounding Affidavit. This details the aforesaid abuses by Twomey J. which led to breaches of the Irish Constitution, EU law, Irish law, international human rights, the Bangalore Principles, Judicial Council Rules, and Judicial Council Act by Twomey J. which amounts to a fraud against the Plaintiffs and a fraud against the people of Ireland who are legally entitled to full informed consent and application of the Precautionary Principle. Also in this case costs did not follow the event as there was no event ; Twomey J. blocked the event from taking place that being court hearings on informed consent and the Precautionary Principle. Indeed Twomey J. went further and prejudiced and pre-judged any future court hearings on informed consent and the Precautionary Principle. The demand by Twomey J. for monies, in the form of costs, from the Plaintiffs to support this fraud constitutes both a criminal offence and a civil offence committed by Twomey J.. This in the circumstances could be construed as a fraud racket and an extortion racket in the courts. The laws and Constitution in place in Ireland apply to everyone, there are no exceptions. There is an onus and duty on the Supreme Court to address this highly important issue in court hearings as it involves events which are bringing the Irish courts into disrepute nationally and internationally.

The twenty third count of fraud is Incriminating Evidence from the VAERS database of the CDC in the USA which the HPRa in Ireland and the EMA in Europe and the Defendants relied on. In 2024, Albert Benavides in the USA examined the VAERS records of the CDC relating to child deaths or deaths of people under 18 years old and found that the age was deliberately left out in the final reports and this resulted in significant under-counting of child deaths from the covid19 vaccinations. He found that VAERS records showed that 538 children died from the covid19 vaccinations NOT 197 as falsely claimed by the CDC. Albert Benavides has VAERS evidence to back up his claim that 538 children were killed by the covid19 vaccinations. Albert Benavides also published a scientific paper containing these findings from VAERS.

This evidence has been compiled by us and I refer the Supreme Court to **Exhibit Children Killed** which is a folder on the usb memory stick. This includes fetal deaths and infant deaths. Albert Benavides stated that undercounting is not unusual for VAERS, noting that his research shows that “30% of all COVID-19 reports in VAERS have an ‘unknown age.’”. Also included is an American news channel which examined this VAERS data and found that children died of myocarditis, pericarditis, other heart illnesses, clots, abnormal bleeds and haemorrhages, abnormal growths, sudden death, spontaneous abortions, deaths in the womb, convulsions, and other well known and well documented side effects of the covid19 vaccinations. These were healthy children prior to covid19 vaccinations. This was NOT revealed to the parents of

children and the general public during mass covid19 vaccinations and afterwards as evidence of illnesses, disabilities and deaths became known to the health authorities and governments and indeed the CDC undercounted the child deaths as found by Albert Benavides. The HPRA in Ireland and the EMA in Europe relied on this false data from the VAERS database of the CDC.

There was NO informed consent for these vaccinations.

The twenty fourth count of fraud relates to the evidence which shows that the judgments and orders of Twomey J. relied upon fraud, fraudulent misrepresentation and breach of contract which led to harm, and breaches of EU and Irish Consumer Protection laws and Clinical Trial laws which led to loss and injury to thousands of living men, women and children in Ireland. This involves the following:

- (i) The breach of contract between Pfizer and the EU Commission and EU authorities and member states including Ireland and reliance on Pfizer's promise that the vaccine was "safe and effective".
- (ii) The breach of contract between the Irish government or state and the Irish people who are defined in article 6 of the Irish Constitution. The Irish people as defined in article 6 of the Irish Constitution relied on the government's and states's and reliance on Pfizer's promise that the vaccine was "safe and effective".

These breaches of contract are detailed in Points 12 and 13 of the Grounding Affidavit which are of the utmost seriousness to the Supreme Court and the European courts and International Courts.

‘ 12. Fraudulent Misrepresentation and Fraud and breach of contract led to breaches of EU and Irish Consumer Protection Law and breaches of EU law and Irish Law regarding Clinical trials was pleaded in court but ignored by the Judge in his judgments and orders. And the Judge's judgments relied upon this Fraudulent Misrepresentation and Fraud and breach of contract and related breaches of EU Consumer Protection Law and breaches of EU law and Irish Law regarding Clinical trials, and this makes the judgments and orders null and void in law. This breach of contract also denied full informed consent to people and breached the Precautionary Principle in EU law and Irish law which was the basis of our court case.

13. Breaches of EU law and Irish law regarding defrauding the EU institutions and authorities were ignored in the judgments and orders. The judgments and orders relied on breach of contract, fraudulent misrepresentation and fraud which caused harm, loss and injury to over 21,000 Irish men, women and children in Ireland and deaths to 50,000 people and injuries, illnesses and disabilities to 5,000,000 people in the European Union. This breach of contract also denied full informed consent to people and breached the Precautionary Principle in EU law and Irish law which was the basis of our court case. ’

The breaches of contract and breaches of EU law and Irish laws are detailed in Points 12 and 13 of the grounding affidavit. This breach of contract also includes corruption and conflicts of interest, fraud, over buying of vaccines where €71 billion was spent securing up to 4.6 billion doses which is over 10 doses for every person in the EU and vast wastage of these vaccines amounting to over five billion euros of

European taxpayers money, vaccine trial frauds, manufacturing defects, fraudulent misrepresentation, breach of the terms of the contract and breach of contract in relation to the covid19 vaccines and non disclosure of vaccine harms, deaths, ineffectiveness, ingredients and risks, denial of informed consent, refusal to apply the Precautionary Principle and the causing of massive financial and economic losses to EU member states, EU Institutions, and EU citizens.

This led to the defrauding of EU institutions and authorities and the Irish government and people and taxpayers. The judgments and orders Twomey J. relied on this fraud and the defrauding of the EU authorities and Irish authorities making them null and void in law, and this will need as a matter of urgency to be addressed in the Supreme Court and/or the European courts and in also in the criminal courts.

I cite the precedent of *Byrne v Ireland* 1972 IR 241 which applies in our court 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.'

The state was sued in court in that case. The state does not enjoy sovereign immunity in contract law, in tort, in Constitutional law, in national and international human rights law, and in criminal law, or inherited (British) royal immunity, as the Irish Constitution states that the people of Ireland are sovereign. The state can be and has been sued for breaches of contract, of tort, of Constitutional law, in national and international human rights law, and can be for breaches of the criminal law, though this would come within the jurisdiction of the superior courts and the European Courts and the ICC. And in some cases state immunity can be lifted to make living men and women working for the state personally accountable and liable in their private capacity for their actions. This is within the remit of this Supreme Court in this case.

In *Ryan v Ireland* 1989 the State was liable in civil law for breaches of Constitutional rights. *Byrne V Ireland* concurred with this decision. *Meskeil V CIE* 1973 IR 121 show the state is liable in tort law and civil law. *Kylemore Bakery Ltd. V Minister for Trade* 1986 ILRM 529 found that government schemes such as a subsidy create a contract between the state and a private entity, and that breach of this contract carries civil and tort liabilities and financial consequences for the guilty party. The precedents cited in Point 2 of this document clearly show that the State can be sued and/or restrained where it breaches the Constitutional rights of the people. Our Book of Authorities for Fraud and grounding affidavit provides precedents and legal argument for the removal of indemnities for companies involved in fraud, misrepresentation, fraudulent misrepresentation and accompanying breaches of contract which causes

harm, loss and injury to thousands of people.

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

On these grounds of fraud committed against the EU Commission and institutions and against the Irish government and against the Irish people, we ask the Supreme Court to remove the veil of protection for corporation soles so that living men and women can be held responsible and accountable for these frauds and crimes and civil or tort offences committed by them. We also ask the Supreme Court to remove the veil of indemnity from covid19 vaccine companies so that living men and women can be held responsible and accountable for these frauds and crimes and civil or tort offences committed by them

Specifically we ask the Supreme Court for the following:

(i) a removal of corporation sole status for all state employees including elected politicians, those people in the government and state bodies mentioned in this court case, including the Minister for Health, the Taoiseach, the Tanaiste, Tony Holohan as CMO, the heads of NPHE, NIAC, HSE, HPRA, the Medical Council, RTE during the mass covid19 vaccinations in 2021, 2022, and 2023 and make them personally accountable and liable in their private capacity for their actions. The grounds are fraud as stated above and in the grounding affidavit and acting outside their corporation sole status and the improper, unlawful and illegal use of the corporation sole and state power to escape accountability for frauds and other crimes and civil offences committed by employees of the state, including breaches of the Irish Constitutional rights of the people of Ireland, breach of the of the Irish Constitution, and attempting to make the Irish Constitution defunct and obsolete in Irish society, in the courts, the legal system and the political system. And to breach national and international human rights laws and the Natural Law, which are binding on Ireland.

(ii) a removal of indemnity protections for the vaccine companies and subsidiaries and their executives and lobbyists involved in this fraud and make the companies accountable and liable and the executives personally accountable and liable in their private capacity for their actions. The grounds are fraud as

stated above and in the grounding affidavit and the Book of Authorities for Fraud, and the improper, unlawful and illegal use of indemnity protection and corporate power and lobbying and state power to escape accountability for frauds and other crimes and civil offences committed by Pfizer and its subsidiaries and servants including breaches of the Irish Constitutional rights of the people of Ireland, breach of the of the Irish Constitution, and attempting to make the Irish Constitution defunct and obsolete in Irish society, in the courts, the legal system and the political system. And to breach national and international human rights laws and the Natural Law, which are binding on Ireland.

Some elements, not all, of Promissory Estoppel apply in this court case as the Irish people as defined in article 6 of the Irish Constitution relied on the government's and states's and Pfizer's promise that the vaccine was "safe and effective". False promises can and do lead to fatal consequences and/or serious injuries and harms. This proved to be untrue for many thousands of people in Ireland and this caused harm, loss and injury to them. This is an obvious breach of contract and this breach led to a breach of the Irish Constitution and Constitutional rights and is an additional ground for removing the protections of corporation sole and the protections of indemnity for vaccine companies using some elements, not all, of the legal principle of Promissory Estoppel. Remedies may involve restitutio in integrum or restoration back to full health and financial status and compensation for harm, stress and inconvenience caused.

And an Order / Declaration on the use of **Eminent Domain** to enforce the contract rights and the Constitutional rights of the Irish people which were breached here, and financial compensation and medical compensation for the many thousands of vaccine victims in Ireland on Pfizer and the Irish politicians and civil servants who approved, authorised, administered and publicly promoted the covid19 vaccine and vaccinations. And that they be declared by the Supreme Court to be financially liable, civilly liable, personally liable, and criminally liable for the thousands of injuries, illnesses, disabilities and deaths caused by the covid19 vaccines in Ireland.

Under law, a person or entity cannot profit from fraud. The honest party, the people of Ireland, and also the EU Commission and EU authorities and member states including Ireland contracted in uberrima fides for a vaccine which was alleged to be "safe and effective" and in conformity with national laws and EU laws. The evidence and facts show that this was NOT the case. The guilty party suffers loss of the contract due to fraudulent misrepresentation and misrepresentation and fraud, making the contract null and void in law while the honest party who has suffered loss, harm, injury and death must be

compensated in full or restitutio in integrum as defined in law.

This is in accordance with justice and equity in law. The law of equity and equitable principles in law takes precedence over other types of law. For centuries, the law has stated that “Equity will not suffer wrong without a remedy”. The remedy stated here in this document and Motion before the Supreme Court ensures that equity will have a remedy and will not have to endure a wrong and suffer loss, harm and injury from this wrong. The Irish Constitution also supports equity and this type of remedy, as it states that there is equality before the law at article 40 of the Constitution and this indirectly supports the equitable remedies proposed here. The Irish Constitution supports one’s right to bodily integrity, one’s right to life, one’s right to informed consent in matters which directly impact one’s right to life and one’s right to bodily integrity, one’s right to earn a living and one’s and one’s right to family and the enjoyment of family life and NOT be denied such by fraud and criminality, and the remedy proposed here is in accordance with the Irish Constitution.

We the Plaintiffs in this Supreme Court case will work and cooperate with the European Public Prosecutor’s Office in relation to the fraud, breach of contract, conflicts of interest, insider dealing and harms and deaths caused by the covid19 vaccines and the related massive financial losses caused to the EU which are "crimes against the financial interests of the EU".

The twenty fifth count of fraud has serious repercussions for this court case, for Twomey J., for the Defendants, and for the Executive, the Legislative and the Judiciary. The repercussions will be profound. The whole covid19 vaccination programme in Ireland relied upon frauds including fraud and defects and fundamental breaches of the Irish Constitution in the law making process concerning the law which created lockdowns, mandatory masking, social distancing which led to the law governing covid19 vaccination and included similar defects in the latter law.

These laws were unconstitutional and breached articles 15, 29, 26 of the Irish Constitution, and this led to breaches of articles 40 to 44 of the Irish Constitution and this led to breaches of article 6 and 39 of the Irish Constitution and the judgments and orders of Twomey J. relied upon these breaches of the Irish Constitution and accompanying fraud. And the Supreme Court judgment, without hearings, also relied upon this.

The following points summarise these breaches:

(i) the law, that being the Health (Preservation and Protection and other Emergency Measures in the Public Interest) Act 2020, passed in March 2020 which began the covid19 lockdowns, masks, social distancing, close down of businesses, and other social restrictions, and led to the covid19 vaccinations and created the artificial demand for covid19 vaccinations, and informed government policies and laws

about covid19 vaccinations, and the imposing of vaccine passports and vaccine apartheid and vaccine mandates in many workplaces was defective, legally infirm, unconstitutional and breached the Irish Constitution . The very grounds for lockdowns and for mass covid19 vaccinations was based on a fraud. This law was passed without a vote in Dail Eireann on March 19th 2020 and without a vote in the Senate on March 20th 2020. I present **Exhibit UnConstitutional Law** to the Supreme Court. This was a breach of article 15 of the Irish Constitution. This was a serious breach of the Irish Constitution and created legal and lawful infirmities, defects and legal infections in all laws concerning covid19 passed after this law.

(ii) the absence of a vote in the Dail or Oireachtas to ratify an international agreement for the covid19 vaccine approval, purchases and vaccinations in Ireland. This a direct breach of article 29 of the Irish Constitution.

(iii) breach of article 26 of the Irish Constitution as a result of non referral of the bill for the Health (Preservation and Protection and other Emergency Measures in the Public Interest) Act 2020 to the Supreme Court for adjudication on Constitutionality and legal status and non ratification of the international treaty or agreement to purchase covid19 vaccines using Irish taxpayers money and promote and administer vaccinations to the Irish people.

This was a breach of article 15 of the Irish Constitution. I quote a subsection of this article below

‘ 11 1° All questions in each House shall, save as otherwise provided by this Constitution, be determined by a majority of the votes of the members present and voting other than the Chairman or presiding member.
2° The Chairman or presiding member shall have and exercise a casting vote in the case of an equality of votes.’

This is corroborated by the breach of Section 87. Casting vote and abstentions of the Standing Orders of Dail Eireann which states that all matters including new laws will be decided by voting and a majority vote in Dail Eireann. I present **Exhibit Standing Orders of Dail** to the Supreme Court. This is also viewable on the Oireachtas web site at

https://data.oireachtas.ie/ie/oireachtas/parliamentaryBusiness/standingOrders/dail/2022/2022-05-26_consolidated-dail-eireann-standing-orders-may-2022_en.pdf

This is further corroborated by the breach of the Standing Orders of Seanad Eireann which states that all matters including new laws passed by Dail Eireann will be subjected to voting and a majority or minority vote in Seanad Eireann. I present **Exhibit Standing Orders of the Senate** to the Supreme Court. This is also viewable on the Oireachtas web site at

https://data.oireachtas.ie/ie/oireachtas/parliamentaryBusiness/standingOrders/seanad/2020/2020-04-15_seanad-eireann-standing-orders-relative-to-public-business-2020_en.pdf

This breach of the Standing Orders of Dail Eireann and Seanad Eireann is in and of itself a serious and material breach of article 15 of the Irish Constitution. I quote a subsection of this article below

‘ 10. Each House shall make its own rules and standing orders, with power to attach penalties for their infringement, and shall have power to ensure freedom of debate, to protect its official documents and the private papers of its members, and to protect itself and its members against any person or persons interfering with, molesting or attempting to corrupt its members in the exercise of their duties.’

There was a widespread perception among the general public and press and media that the Dail was in emergency session or subject to some form of emergency associated with covid19 at the time. If the Dail was in emergency session on March 19, 2020, then two thirds of TD's should have been present in the Dail at the time. Only 48 TD's were present and this is much lower than the two thirds of TD's elected to the Dail and legally present in the Dail, as required under article 15 of the Irish Constitution. I quote a subsection of this Constitutional article below

' 2° In cases of special emergency, however, either House may hold a private sitting with the assent of two-thirds of the members present.'

This law was repugnant to the Irish Constitution at article 15 of the Constitution and by its nature, its construction, its passing, its effects and consequences, and these consequences included breaches of articles 40 to 44, including fundamental rights and unenumerated rights, as seen in the severity of the social restrictions and oppression imposed upon the Irish people at the time, and breach of article 6 of the Irish Constitution which in turn led to a breach of article 39 of the Irish Constitution. This is both a civil offence and a criminal offence, and both will be prosecuted in the courts. I cite article 15 :

‘ 4 1° The Oireachtas shall not enact any law which is in any respect repugnant to this Constitution or any provision thereof.

2° Every law enacted by the Oireachtas which is in any respect repugnant to this Constitution or to any provision thereof, shall, but to the extent only of such repugnancy, be invalid. ‘

The breaches of articles 40 to 44 of the Irish Constitution, including fundamental rights and unenumerated rights has been reinforced by the Irish government refusing to set up a covid19 vaccination injury / death compensation fund for the many thousands of vaccine victims in Ireland. This is an additional breach of articles 40 to 44 of the Irish Constitution and carries both criminal liability and civil liability for the politicians and civil servants involved.

This was a serious breach of the Irish Constitution and created serious and fatal legal and lawful infirmities in all laws concerning covid19 passed after this law in March 2020. This makes these laws null and void in law and in Constitutional terms. This means the criminal prosecutions of and civil actions against those people who broke the laws concerning covid19 and covid19 vaccinations can be challenged and overturned in Irish courts.

No war, armed conflict, or armed rebellion was publicly declared or declared inside Dail Eireann so the

provisions of article 28.3 of the Irish Constitution did not apply in 2020 and in the period 2020 to 2024.

The international contract and agreement between Pfizer and the EU Commission and EU member states for covid19 vaccines was NOT laid before Dail Eireann for a debate and a vote. This was a breach of article 29 section 5 and 6 of the Irish Constitution, which I cite below:

5 1° Every international agreement to which the State becomes a party shall be laid before Dáil Éireann.

2° The State shall not be bound by any international agreement involving a charge upon public funds unless the terms of the agreement shall have been approved by Dáil Éireann.

6 No international agreement shall be part of the domestic law of the State save as may be determined by the Oireachtas.

Dail Eireann and Oireachtas are specifically stated here and they are the legislative. All TD's and Senators. The executive is NOT Dail Eireann or the Oireachtas ; the executive is NOT the legislative. These breaches of Irish Constitution are serious and fatal and nullify the covid19 laws and covid19 approval, purchases and vaccinations, making those responsible for this and its many adverse consequences liable in civil law, in tort and in criminal law.

There was a breach of article 26 of the Irish Constitution as the President's legal and Constitutional duty is to refer these type of bills, which are obvious breaches of articles 15 and 29 of the Irish Constitution to the Supreme Court for adjudication on their Constitutionality and legal status. This was not done.

TD's and Senators do NOT enjoy legal immunity or shielding from the consequences of their actions which includes breaches of the Irish Constitution and Irish law and EU law and international human rights law including the Nuremberg Code and the causing of harm, loss and injury to many thousands of living men, women and children in Ireland. In particular, breaches of the Irish Constitution and Irish laws which cause loss, harm, injury to thousands of Irish people carries serious legal consequences. The covid19 vaccine has had the effect of a dangerous weapon which has caused injuries, illnesses, disabilities and deaths to at least 21,000 Irish people and many thousands more people according to official statistics from state bodies in Ireland, the EU, Britain, the USA and around the world.

The fact that that these breaches of the Irish Constitution led to harm, loss and injury to thousands of Irish people means there was a breach of article 39 of the Irish Constitution. Full accountability for this to the Irish people and nation is required under article 6 of the Irish Constitution.

I cite article 15 section 13 of the Irish Constitution and article 39 of the Irish Constitution.

‘ 13. The members of each House of the Oireachtas shall, except in case of treason as defined in this Constitution, felony or breach of the peace, be privileged from arrest in going to and returning from, and while within the precincts of, either House, and shall not, in respect of any utterance in either House, be amenable to any court or any authority other than the House itself ’

ARTICLE 39

Treason shall consist only in levying war against the State, or assisting any State or person or inciting or conspiring with any person to levy war against the State, or attempting by force of arms or other violent means to overthrow the organs of government established by this Constitution, or taking part or being concerned in or inciting or conspiring with any person to make or to take part or be concerned in any such attempt.

Unconstitutional laws, policies and agreements have been struck down and overturned in the past. I cite the precedent of *Murphy V Attorney General* 1982 IR 241 to support our case. And I cite the precedents of

State (Burke) v Lennon [1940] I.R. 136

N.H.V. v Minister for Justice & Equality [2017] IESC 35

Ali Charaf Damache v the Minister for Justice and Equality 2020

Attorney General V X [1992] 1 IR 1

McGee v The Attorney General [1974] IR 284

McMahon v The Attorney General, 1972 IR 69

Benedict McGowan and Others v Labour Court and Others [2013] 2 ILRM 276; [2013] IESC 21; [2013] 3 IR 718

Heneghan v Minister for Housing, Planning and Local Government & Ors [2023] IESC 7.

Though the scale of breaches of the Irish Constitution detailed in this document and in the Grounding Affidavit are unprecedented in Ireland since the foundation of the Irish state in 1922 and in the centuries before it. This will require the setting of a new precedent(s).

These frauds led to serious and fatal breaches of the Irish Constitution which Twomey J. relied on in his judgments and orders creating fatal defects which render them null and void in law. We seek an Order / Declaration overturning the judgments and orders of Twomey J. and of the Supreme Court.

These twenty five counts of fraud when viewed in totality are one of the most outrageous frauds ever perpetrated in Ireland. I would remind the Honourable and Learned Supreme Court judges that superior court cases are being taken and some are ongoing in other jurisdictions and countries where this fraud is being exposed and litigated and will be adjudicated on. I have referred to some of these cases in this document and in the grounding affidavit.

The Defendants relied on these twenty five frauds stated above in this court case and the judgments and orders of Twomey J. also relied on these frauds. The hasty judgment of the Supreme Court with no court hearings also relied on these frauds and relied on the judgments and orders of Twomey J. which relied on these frauds. This reliance on fraud makes the judgments and orders of the High Court and Supreme Court null and void in law in this court case.

In support of our pleading of fraud in this case, I rely on the precedents stated below which apply to the twenty five counts of fraud in our court case.

In support of my application, I cite the Supreme Court precedent of Takhur VS Gracefield, 2019 in Britain where the honourable and learned judges granted an application to set aside a judgment on the basis of fraud, after finding that the applicant did not have to demonstrate that she could have obtained evidence of the fraud with 'reasonable diligence' in advance of the earlier trial. The judgment, which was backed by seven Supreme Court judges resolved a conflict between two legal principles: the common law principle that 'fraud unravels all' and the principle that there must be finality in litigation. Judgments based on or reliant on fraud cannot stand in any court. They must be struck down or set aside, as they are null and void ab initio. And that pleading fraud does not constitute an abuse of process or a re-hearing or re-litigation of a case. This precedent applies in our case before the Supreme Court as we had no advance knowledge or foreknowledge that Twomey J. would use a fraudulent instrument in his judgment and order and rely on this fraud in his judgment and order.

We also rely on the precedent of Lazarus estates VS Beasley 1956 Judge Lord Denning ruled that 'Fraud vitiates everything' and unravels contracts, indemnities, judgments, orders, policies, etc.. The legal principle here is very clear, that being courts and judgments should NOT be used to promote fraud, legitimise fraud, enforce fraud, and support fraud. These two precedents apply in our case before the Irish Supreme Court.

In support of this, we also rely on many precedents regarding fraud and how it makes judgments, orders and proceedings null and void in law. This is in our **Book of Authorities – Fraudulent Seals** and our **Book of Authorities – Void Proceedings and Void Judgments** and **Book of Authorities for Fraud**.

In support of our case I rely on the precedents of Tassan Din v Banco Ambrossiano S.P.A. where Murphy J laid down the principles involved in this and that fraud was grounds for setting aside or overturning a judgment. This applies in our court case. This precedent and view on fraud was affirmed in Dormer VS AIB and others 2015, where the following was stated

‘But the law is clear that nothing short of fraud, pleaded with sufficient particularity and established on the balance of probabilities would constitute sufficient grounds for upsetting a previous decision given by the court and which has not been appealed.’

This precedent also applies in our court case.

In further support of our pleading of fraud in this case, I rely on *Kenny VS Trinity College Dublin, 2008* in the Supreme Court where the following was stated in the judgment:

‘ In the absence of fraud, it would be vexatious and an abuse of the process of the Court to litigate any matter which was already concluded by a final and binding Order of the Court¹. Fraud is the only basis on which such an Order could be set aside.’

There exists a jurisdiction to set aside a prior judgment on the grounds that it was obtained by fraud, I cite *Waite v. House Spring Gardens Limited*(Unreported, High Court, Barrington J., 26th June, 1985. This jurisdiction exists as an exception to the well-recognised principle of the finality of judicial decisions. This was upheld in *Dublin Corporation v. Building and Allied Trade Union* [1996] 1 I.R. 468, where Keane J. stated the following:

“The doctrine of *res judicata* applicable to this, as to every final judgment or award of any competent court or tribunal, has the consequence that the parties are estopped between themselves from litigating the issues determined by the award again. The justification of the doctrine is normally found in the maxim *interest reipublicae ut sit finis litium* and it is important to bear in mind that the public interest referred to reflects, in part at least, the interest of all citizens who resort to litigation in obtaining a final and conclusive determination of their disputes. However severe the stresses of litigation may be for the parties involved - the anxiety, the delays, the costs, the public and painful nature of the process - there is at least the comfort that at some stage finality is reached. Save in those exceptional cases where his opponent can prove that the judgment was procured by fraud, the successful litigant can sleep easily in the knowledge that he need never return to court again.”

In support of my case, I cite and rely on *Desmond v Moriarty* [2018] IESC 34 argued and adjudicated on in the Irish Supreme Court in 2018, where the following principles apply to setting aside or overturning court judgments and orders acquired by fraud, based on fraud or reliant on fraud :

- ‘ i. The power to set aside a final judgment on the ground of fraud is an exceptional one.
- ii. This jurisdiction must be seen against the backdrop of the important principle of *res judicata* and of the public policy which discourages endless litigation, which reflects the interest of all citizens who resort to litigation in obtaining a final and conclusive determination of their disputes.
- iii. There are three aspects of this important, though exceptional, power:

a. First, the quality or degree of fraud or dishonesty that must be alleged. In order to ground an action to set aside a judgment, the plaintiff must allege fraud in the true sense, that is, deliberate and purposeful dishonesty, knowing and intentional deceit of the court.

b. Second, the extent to which it must be shown that the alleged fraud affected the impugned judgment. In this respect, the fraud alleged must be such as to affect the impugned decision in a fundamental way. It will not suffice to allege that the new situation revealed by the uncovering of the fraud might have affected the judgment. The fraud must be such as to “change the whole aspect of the case”. Put another way, the fraud must go to the root of the case.

On a related point, although typically a court approaches an application to dismiss pursuant to Order 19, rule 28 on the basis of the pleadings alone, that test must apply in a modified form in an application such as the present; here, where the substance of the claim is the validity of a final decision of a court of competent jurisdiction, the court hearing an application to dismiss must be permitted to examine the impugned decision, including the reasoning of the judgment.

c. Third, the particularity with which the fraud must be pleaded. The allegation of fraud said to have deceived the former court must be pleaded with particularity and exactness. The nature of the fraud, deceit or dishonesty must be clearly and unambiguously alleged. ’

Our plead of fraud and twenty five counts of fraud in this court case satisfies these principles set by the Supreme Court above. The twenty five frauds change the whole aspect of our case. It goes to the very root of the case. This fraud has affected the impugned judicial decision in a fundamental way and in such a manner as to make the judgments and orders of Twomey J. reliant on fraud and thus tainted by fraud. And affected the Supreme Court judgment, without hearings, in a similar manner, making it reliant on fraud. The fraud has transformed the case into one about these frauds and perversion of justice and breaches of the Irish Constitution and EU law and Irish law. There was knowing and intentional deceit of the court and of the Plaintiffs and of the people of Ireland as defined in article 6 of the Irish Constitution. These twenty five counts of fraud show fraud over a period of time, even when the truth, the facts and the evidence become clear to all, and this persistence in a fraud shows intent. This shows deliberate and purposeful intent as defined in Irish Supreme Court precedents.

The legal facts clearly show beneficiaries of fraud and injured parties from this fraud in our case, and attempts to conceal and hide the fraud, and these are vital ingredients of fraud. The great efforts made by the beneficiaries of this fraud, in this case the covid19 vaccine companies and members of the Irish government and senior civil servants and health authorities to conceal and hide the fraud and to ignore, dismiss, fob off, ‘gaslight’ or mock and neglect the victims of this fraud that being the thousands of Irish people who were injured, made seriously ill, disabled or suffered premature death shows Deliberate and

Purposeful Dishonesty and Malicious Intent which is reinforced by the cover up of this wrong or crime against the Irish people and not accepting liability for it. Deliberate and Purposeful Dishonesty and Malicious Intent are ingredients of Fraud, especially in respect of trying to conceal or cover up the crime including the injury done to others.

In *Forest Fencing Ltd V Wicklow County Council*, Herbert J stated that fraud is a valid ground for setting aside or rescinding a judgment and order. The precedent of *AA V BB* in the Supreme Court also made a similar finding where fraud was involved.

The legal principle of **Res Ipsa loquitur** which is Latin: "*the thing speaks for itself*" applies here in this court case. We have all observed the non disclosure, the deception and frauds in the promotion of these covid19 vaccines and the terrible consequences in terms of record numbers of vaccine injuries, illnesses, disabilities and deaths, and the large rise in excess mortality shortly after mass vaccinations, especially in highly vaccinated countries. This legal principle of **Res Ipsa loquitur** has been upheld by the Supreme Court and High Court in Ireland since the foundation of the Irish State. The most recent application of this legal principle was in the Irish Supreme Court in *Doherty v Reynolds and St. James's Hospital Board* [2004], where the legal principle of **Res ipsa loquitur** was applied in the judgment of the Supreme Court in circumstances very similar to the one being presented here in the High Court. The Supreme Court found that the only reasonable and logical explanation in the circumstances was medical negligence and the injured party was entitled to compensation.

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

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

General) v Singer (1961) was a landmark case in Irish law and has great relevance to our case and indeed other court cases involving covid19.

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

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

Inferences can be made by this High Court based on overwhelming and irrefutable evidence worldwide, presented by us to the court. The evidence in our court case is substantial and when combined together and viewed as a whole shows the balance of probabilities points to fraud in this court case. The precedent set for balance of probabilities in Banco Ambrosiano SPA and Others v Ansbacher & Company Ltd and Others (1987) is relevant here.

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

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

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

As regards allegations of coincidences in relation to a sudden massive increase in excess mortality after

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

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

The Non Disclosure of risks and dangers associated with a vaccine has significant case law and precedents. Non Disclosure enabled and facilitated the false pretences used to promote these covid19 vaccines and boosters to the general public. This placed the general public at a massive disadvantage and facilitated the fraud committed against them. Many of these precedents are mentioned in the Informed Consent section of our first Book of Authorities and our affidavits filed in the court, and some will be mentioned here. Non Disclosure still remains an important issue in these type of court cases, for example in Davis VS Wyeth (1968) the US 9th Circuit Court made the vaccine manufacturer liable for the injuries caused by their polio vaccine as there were inadequate warnings of risks and dangers supplied to the vaccine recipients and the general public.

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

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

dishonesty and fraud unravels contracts and other types of agreements, and this also applies to politicians and civil servants involved in fraud and deception.

In support of our pleading of fraud in this case, we also rely on many more precedents regarding fraud which show that fraud makes judgments, orders and proceedings null and void in law. This is in our **Book of Authorities – Void Proceedings and Void Judgments** and **Book of Authorities for Fraud** and **Book of Authorities – Fraudulent Seals**

Even final judgments of the Supreme Court can be set aside or rescinded on grounds of fraud and judgments and orders which relied on fraud. No court can be the venue for fraud, the promoter and supporter of fraud, and the legitimiser of fraud, and no court can support or uphold judgments and orders based on and reliant on fraud, and use of this fraud to undermine the administration of justice, the courts, and breach Constitutional rights of litigants and the general public.

The judgment of the Supreme Court made without any court hearings in 2023 relied upon the aforementioned frauds above which were the frauds relied upon by the Defendants and by Twomey J. in his judgments and orders. Fraud nullifies and unravels everything according to the aforesaid precedents. This makes the judgments and orders of Twomey null and void ab initio. The judgments of the Supreme Court relied upon the judgments and orders of Twomey J and the pleadings of the Defendants which both relied upon fraud and are tainted by fraud. This in turn makes the Supreme Court judgment indirectly reliant on fraud and tainted by fraud and this is a valid ground for rescinding the Supreme Court judgment. No court, including this honourable Supreme Court can uphold these frauds and the judgments and orders of Twomey J which are based on this fraud and reliant on fraud. This reliance on fraud by the Defendants when taken in totality has proved fatal to their case. The Supreme Court cannot uphold any judgments and orders based on fraud, reliant on fraud and derived from fraud and should set aside or rescind all judgments and orders in this court case. Justice under law must be done and must be seen to be done.

For over 100 years, the law and the courts have determined that fraud unravels everything, including contracts, international agreements and contracts between governments and (vaccine) corporations, indemnities for vaccine companies and other types of businesses and individuals, laws, government policies, Ministerial protections, corporation sole protections, parliamentary protections or Dail protections, national and international agreements, government policies and laws promoting and administering covid19 vaccines and boosters, decisions of medical councils, financial gains and assets made through fraud, etc.

Covid19 Vaccine Injury court cases pleading fraud and breaches of informed consent and breaches of the Constitution in other jurisdictions and countries

There are four federal court cases in the USA and one State court case involving the State of Kansas against Pfizer and one case before the US Supreme Court in the USA in relation to this. Their legal arguments and evidence and grounds for action are similar to our court case. They are seeking legal redress in the courts for the illnesses, disabilities and deaths inflicted by the covid19 vaccinations and the frauds

associated with the covid19 vaccines and vaccinations and the vaccine mandates which were based on these frauds. This corroborates our legal arguments, pleadings, evidence and cause of action, and gives additional credibility to our court case. By May 2024, VAERS of CDC reported that the covid19 vaccines had killed 37,647 people and injured 1.6 million people in the USA. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit VAERS 2024**. There are many thousands of people in the USA seeking legal redress in the courts for the illnesses, disabilities and deaths inflicted by the covid19 vaccinations and the frauds associated with the covid19 vaccines and vaccinations.

The three federal court cases and one Supreme Court case in the USA are :

1. MOMS FOR AMERICA, JEFF JACKSON, AND OTHERS V U.S. DEPARTMENT OF HEALTH AND OTHERS.

I refer to **Exhibit US Court 1**

2. ESTATE OF GEORGE WATTS, JR. V LLOYD J. AUSTIN III

I refer to **Exhibit US Court 2**

3. ALICIA SMITH, AND OTHERS V UNITED STATES HEALTH RESOURCES AND SERVICES ADMINISTRATION AND OTHERS

I refer to **Exhibit US Court 3**

4. HEALTH FREEDOM DEFENCE FUND AND OTHERS V CARVALHO AND OTHERS

I refer to **Exhibit US Court 5**

5. STATE OF KANSAS V PFIZER INC.

I refer to **Exhibit US Court 4**

6. CHILDREN’S HEALTH DEFENSE, ET AL V UNITED STATES FOOD AND DRUG ADMINISTRATION, ET AL.,. US Supreme Court, Washington DC.

I attach **Exhibit US Supreme Court** to this document and to our proceedings. This Supreme Court case in the USA uses many of the legal arguments and evidence we have used in our case and addresses many of the points in our court case in Ireland and both cases affect each other. I quote from this US Supreme Court case:

‘ QUESTION PRESENTED

Whether a Constitutionally cognizable case or controversy exists under Article III when agency action causes substantial resource diversion of an organization and exposes children they represent

to an unvetted and unsafe “vaccine”, in light of this Court’s conflicting injury-in-fact standards set forth in *United States v. Students Challenging Regulatory Agency Procedures*, 412 U.S. 669 (1973) and *TransUnion LLC v. Ramirez*, 495 U.S. 413 (2021)? ’

We submit these documents as Exhibits and evidence for our Supreme Court case in Ireland.

Evidence presented in an ongoing court case in Kansas in the USA titled ‘State of Kansas VS Pfizer’ in 2024 shows that Pfizer and the Regulators including the FDA in the USA, the EMA in Europe and the HPRA in Ireland all knew that the covid19 vaccines were causing serious illnesses, disabilities and deaths from March 1st 2021 onwards. The Plaintiff’s sworn affidavit and submissions to the court in Kansas provide a large amount of prima facie evidence of this, some of it from Pfizer, including dates and sources. I refer to **Exhibit US Court 4**. I would ask the Supreme Court Judges to read the long list of incriminating evidence. This corroborates the evidence we provided to the High Court and now to the Supreme Court. This proves fraud, as Pfizer and the Regulators including the FDA in the USA, the EMA in Europe and the HPRA in Ireland were falsely claiming that the vaccines were “safe and effective” at that time and after it and up to the present day. This fraud undermined, blocked and denied informed consent for the covid19 vaccinations.

This fraud meant that there was NO informed consent for these vaccines.

Judge Michael Twomey did not have the power to deny the Irish people their legal and Constitutional right to Informed Consent. He wrongly presumed to have this power in his judgment and orders in the High Court. He acted Ultra Vires and his judgments and orders are Ultra Vires. I rely and cite a recent High Court in Britain on this subject.

Landmark court case in Britain where a British mother fought in the courts for her right to informed consent to stop the covid19 vaccination of her disabled child

Every effort was made by the British health and government authorities to prevent a mother exercising her legal right to informed consent to stop the covid19 vaccination of her child, Tom. Coercion and threats were used to deprive the mother of informed consent. She was threatened with arrest, jail, seizure of her assets and the possibility of her son, Tom, being removed from their home to be “forcibly jabbed”. The British health and government authorities claimed that the covid19 vaccine was “safe and effective” for her son yet concealed and hid important evidence about the vaccine. The same happened in Ireland.

She feared the messenger RNA (mRNA) vaccine, which tells cells how to trigger an immune response to Covid, could cause an adverse reaction in the heart of her son. So, she resisted doctors and social workers’ demands that he be injected for the “greater good of society”.

On July 12th 2024, Mr Justice Hayden, sitting in the Court of Protection in the UK, has ruled it is “no longer in Tom’s best interests to receive the jab” . Mr Justice Hayden the has ruled that Tom need not have the jab after hearing expert evidence from US academic Prof Martin McCaffrey. The names of the mother and son have been redacted for legal reasons in Britain, as the son is vulnerable adult.

This court case was reported in the Daily Telegraph in Britain:

Mother wins battle to stop son having Covid vaccine she feared could kill him

Daily Telegraph newspaper, July 13 2024

<https://www.telegraph.co.uk/news/2024/07/13/mother-battle-covid-jab-feared-kill-son/>

We rely on and cite this precedent from the High Court in Britain in our case.

On this point, I say that Mr. Pascal Najadi a Swiss national has successfully filed a civil case against Pfizer and the FDA in the New York Supreme Court in the USA on March 7th 2023. The grounds for this are the covid19 vaccines fraud and the injuries and losses resulting from this fraud. This is a criminal case against a Swiss politician for promoting the unsafe Pfizer covid19 vaccine. The harms and damage caused by this covid19 vaccine, and the danger it poses to the general public are the subject of this Supreme Court case in New York.

News reports at

<https://rumble.com/v2c6ny8-breaking-news-pascal-najadi-sues-pfizer-in-new-york-supreme-court.html>

<https://www.google.com/search?client=firefox-b-d&q=pascal+najadi+new+york+supreme+court>

<https://yandex.com/search/?text=pascal+najadi+new+york+supreme+court&lr=10426>

I further say that on the subject of legal proceedings and courts, in December 2022, Swiss banker Mr. Pascal Najadi filed criminal charges and fraud charges against the Swiss President Alain Berset. This has been accepted by the prosecution authorities and will proceed to court in Switzerland. The grounds for this are fraud in relation to the covid19 vaccines and injuries resulting from this fraud. I refer to **Exhibit Swiss Crimes**.

Yes indeed, these are “most exceptional circumstances” and most exceptional times we live in. All of the above, which applies in our court case fulfils the Learned and Honourable Justice Denham’s criteria for “most exceptional circumstances”, and the criteria laid down by Judges in other Supreme Court cases. Finally in support of our case I rely on the precedent of *Byrne v Ireland* 1972 IR 241 which applies in our court 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.'

The aforementioned frauds and precedents in relation to fraud are very serious and fatal to the judgments and orders of Twomey J., making the judgments and orders of Twomey J. reliant on fraud and based on fraud. And the Supreme Court judgment, without hearings, which relied on the judgments and orders of Twomey J. are also tainted by fraud and reliant on it. Indeed the precedents set in the Supreme Court and superior courts and in the European Courts in addition to the breaches of the Irish Constitution, EU law and Irish law, international human rights law binds the hands of the Supreme

Court judges in this court case in respect of setting aside or overturning the judgments and orders of Twomey J. and that this provides valid grounds for rescinding the Supreme Court judgment which relied on the judgments and orders of Twomey J.

3. Serious and Fundamental breaches of the Irish Constitution and International Human Rights qualify as “Exceptional Circumstances” and grounds for setting aside or overturning these court judgments and orders

We intending to apply to the Court to vary or rescind a final judgment or order made by the Court (in this practice direction “intending applicant”) bear a very heavy onus of establishing that such circumstances exist. And the most exceptional circumstances exist as stated in the Points in this document and in the grounding affidavit.

Under this legal provision and under the Irish Constitution and applicable Irish law and EU law, and precedents cited below, it is necessary for all of the Supreme Court judges to have sight of this SC17 Motion and grounding affidavit and exhibits and to hold court hearings to adjudicate on this. This case is an exceptional case which involves serious breaches of the Irish Constitution in such a manner as to render the Irish Constitution defunct and obsolete and involves serious breaches of international human rights covered by Irish law and EU law and UN law so as to render human rights non existent in Ireland and involves attacks on the Common Good so as to render it a meaningless and redundant term in Irish Constitutional terms and legal terms.

The facts stated below and in the grounding affidavit fulfil the Learned and Honourable Justice Denham’s criteria for “most exceptional circumstances”, and the criteria laid down by Judges in other Supreme Court cases.

In support of our case I rely on the precedent of *Byrne v Ireland* 1972 IR 241 which applies in our court 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.'

Yes indeed this precedent is most relevant to our court case and furthermore it is highly relevant to the protection and defence and vindication of Irish Constitutional rights of the people of Ireland against all forms of attack including attack by the state and/or it’s agents.

In both the High Court and now the Supreme Court we the Plaintiffs in this court case :

(i) invoke and invoked articles 6, and 40 to 44 of the Irish Constitution and both fundamental rights and unenumerated rights, in particular article 41 relating to ‘inalienable and imprescriptible rights, antecedent and superior to all positive law’ and our international human rights as Plaintiffs and Irish people as defined in article 6 of the Irish Constitution and on behalf of Irish people as defined in article 6 of the Irish Constitution and this includes those people adversely affected by the covid19 vaccines and those people considering taking them or not, and the fact that important information about the vaccines was not publicly disclosed by the Defendants meaning the people of Ireland did NOT give their full informed consent for the vaccines. And the breaching of Irish and EU law in relation to informed consent and the Precautionary Principle has implications for the people of Ireland as defined in articles 6 and 40 to 44 of the Irish Constitution. We also invoke articles 40.3 and 43 of the Irish Constitution relating to the property rights of the Plaintiffs who have brought this case in the Public Interest and for the Common Good as defined in the Irish Constitution and the property rights of the many thousands of Irish people who did not give their full informed consent for the covid19 vaccines and now suffer harm, loss and injury from this due to vaccine injuries, illnesses, disabilities and deaths now acknowledged by official state bodies and scientific research and medical doctors here in Ireland and many other countries.

(ii) detailed the outcome or results of this

1. breach of informed consent and

2. breach of the Precautionary Principle

which were the whole purpose of our court case and which led directly to breaches of articles 6, and 40 to 44 of the Irish Constitution and both fundamental rights and unenumerated rights, in particular article 41 relating to ‘inalienable and imprescriptible rights, antecedent and superior to all positive law’ and breaches of international human rights protected under Irish law, EU law, the UN Declaration of Human Rights, and the Nuremberg Code and international law of many thousands of covid19 vaccine victims and their families according to the prima facie evidence from Pfizer itself and from official government bodies worldwide and pathology and Autopsy evidence, and over 3,400 published and peer reviewed scientific studies and other prima facie evidence submitted by us to the court. This includes breaches of the right to bodily integrity, the right to life, right to get full disclosure so as to provide full informed consent in matters which affect bodily integrity and right to life, their family rights, their fundamental rights and unenumerated rights, their natural law rights, and their human rights under Irish and EU and international laws. The Judge aided and abetted these breaches of these Constitutional rights, Natural law rights, human rights and legal rights by refusing to hold full court hearings on breaches of informed consent and the Precautionary Principle and refusing to allow witnesses that is vaccine victims and expert witnesses testify and be cross examined in court.

Informed Consent and application of the Precautionary Principle under EU law and Irish law has three distinct periods

1. The period after the Pfizer covid19 vaccine trial which was November 18th 2020 and the period after marketing authorisation for the vaccine by the EMA on December 21 2020 when important and material facts about the vaccine were known but NOT disclosed to the general public.
2. The period when mass covid19 vaccinations began which was January 7th 2021 in Ireland when important and material facts about the vaccine were known but NOT disclosed to the general public.
3. The long period after the beginning of mass covid19 vaccinations which was after January 7th 2021. Once the high number of harms, illnesses, disabilities and deaths became known to the health authorities in Ireland and abroad, medical doctors, hospitals, and the government there was a legal and Constitutional duty to inform the general public so as to attain informed consent and apply the Precautionary Principle under EU law and Irish law. This was NOT done.

(iii) stated that the Defendants and Irish government have NOT proved that the covid19 vaccines were safe and effective. They carried out NO safety tests and NO efficacy tests and have provided no conclusive scientific evidence to prove that they were safe and effective. Yet they publicly claimed that the vaccines were “safe and effective”. The 21,000 Irish people injured made ill disabled or dead from these vaccines relied on these public claims by the Defendants and Irish government that the vaccines were “safe and effective”. The burden of proof is on the Defendants and Irish government as they made public claims which the general public relied on.

(iv) detailed breaches of the Constitutional rights and international human rights of the Plaintiffs and breaches of the Bangalore Principles, Judicial Council Act, Superior Court Rules, and ancient legal principles of due process, fair hearings, fair procedures, audi alteram partem, equality of arms and other breaches of the Constitution and national and international laws detailed in Points 1 to 29 of the Grounding Affidavit.

This court case involves breaches of such fundamental rights and unenumerated rights as the right to life, the right to bodily integrity, the right to earn a living, the right to a family life, the right to privacy and one’s good name, and the right for one’s case to be heard in court and equality before the law, and the right to be fully informed about medical procedures and/or products which affect one’s right to life and one’s right to bodily integrity and the other aforementioned rights. These breached rights are protected under the Irish Constitution, the Natural law, the Divine law and national and international human rights law and the Nuremberg Code. The breaches of these rights are so serious and fatal, and the deliberate and calculated and biased attempts to stop full court hearings to address these same breaches and the court case itself render the Irish Constitution obsolete, defunct and no longer operational, and the courts and administration of justice in Ireland brought into total disrepute.. This is matter of the greatest urgency for the Supreme Court and must proceed to full Supreme Court hearings.

Under articles 6 and 40 to 44 of the Irish Constitution we had a right to bring this case to the High Court and now the Supreme Court as the government is accountable to the people of Ireland and the people of

Ireland do have Constitutional rights and human rights. These are not state given rights, they are rights which people are born with and are antecedent and superior to all positive law and inalienable and which the Constitution recognises. The state does not give fundamental Constitutional rights or take away such rights, it is merely there to safeguard them and protect them. Hederman J. in Crotty VS An Taoiseach 1987, in the Supreme Court clearly stated the State are the guardians of the Irish Constitution and it's powers not the disposers of them. This precedent applies in our court case as Constitutional rights was and is the main issue in our court case.

The facts and evidence in our court case shows that the state or some powerful elements within the state have abused the state's powers to breach the Irish Constitution, fundamental rights and unenumerated rights under the Irish Constitution and international human rights and EU law.

Although some people with arrogant and superior attitudes and personalities presume that the people of Ireland do not have these rights and that they can be poisoned and made ill, disabled or die and then be ignored, be blocked and denigrated and refused compensation by those who promoted, authorised and administered the poison to the people. The poisoners in this case being senior elected politicians and civil servants and the Defendants, who acted under the belief or presumption that their high social status would enable them and allow them to breach the Irish Constitution, EU law, Irish law and international human rights law and escape justice. And that the judiciary would be too cowed, too submissive and too fearful to enforce accountability on behalf of the people of Ireland under article 6 of the Irish Constitution and enforce the checks and balances to power recommended by the Irish Constitution. The separation of powers within the Irish Constitution is there for the express purpose of providing checks and balances to power and limitations to state power, and preventing state over-reach, executive over-reach, legislative over-reach and judicial over-reach which would breach the Irish Constitution, EU law which is protected by Constitutional provisions and international human rights law which concords with the Irish Constitution. The terrible wars and genocides and totalitarian ideologies of the 20th century shows where state over-reach and other forms of over-reach lead to.

We invoked and still invoke articles 6 and 40 to 44 of the Irish Constitution in the High Court and sought to make the government accountable to the people of Ireland on a very important issue and this issue must be dealt via full court hearings.

I refer the Honourable and Learned Judges of the Supreme Court to Point 2 of our grounding affidavit showing exactly and precisely why informed consent was not given for the covid19 vaccinations and why the Precautionary Principle under EU law and Irish law was not applied. And evidence is provided to back this up, in the form of our exhibits, sworn affidavits and submissions.

In consideration of these facts and evidence, I now ask the Honourable and Learned Judges of the Supreme Court the following question :

How can any living man, woman or child give their informed consent if they are not informed ?

The answer is obvious to all.

The most exceptional circumstances exist in this court case unprecedented in the history of the Irish

state and in the period prior to 1922. This court case deals with experimental covid19 vaccinations for which full disclosure of over 1,100 types of illness, disability and death from Pfizer's own internal documents and their filings with the regulatory bodies such as the EMA, the HPRA (Ireland), the FDA, the CDC, NIH and MHRA was NOT given to vaccine recipients and the general public in Ireland. Our documentary evidence, mentioned above, is corroborated and verified by other important prima facie evidence from pathologists and autopsies, government statistical bodies in many countries, and over 3,400 published scientific research studies which was NOT given to vaccine recipients and the general public prior and during to mass covid19 vaccinations and in the period between this and the rollout of booster vaccinations. There was NO full disclosure to vaccine recipients and the general public. We have documentary evidence from Pfizer itself and the regulatory bodies and government bodies to prove this beyond reasonable doubt. We are using the criminal burden of proof in this court case, which is a higher standard of proof than that used for civil cases in court.

This non disclosure and deliberate concealment of important and material information about the vaccines means that there was NO full informed consent given by vaccine recipients and the general public, and this has led to over 21,000 Irish people being injured, made ill, disabled or suffered premature death from the covid19 vaccinations according to the HPRA but the evidence from official state sources in Ireland and abroad show that the real death figures may be several multiples of this, according to GRO, CSO, Eurostat and RIP.ie figures showing a sudden, unexpected and massive rise in excess mortality after mass covid19 vaccinations from May 2021 to the end of 2023. Excess mortality from May 2021 to the present in 2024 is over 18,000 people. This number is unusually high. This is detailed in our grounding affidavit. The same also happened in other highly vaccinated countries worldwide according to official government data and published scientific studies in those countries.

21,000 Irish people suffered injuries, illnesses, disabilities or deaths from the covid19 vaccines. By May 2024, VAERS of CDC reported that the covid19 vaccines had killed 37,647 people and injured 1.6 million people in the USA. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit VAERS 2024**.

By February 2023, Eudravigilance of the European Medicines Agency in Europe reported that the covid19 vaccines had killed over 50,000 people and injured over 5 million people. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit Eudravigilance 2024**. This was deliberately hidden and concealed from the general public and vaccine recipients by the Defendants and government authorities in other countries. The general public were duped with lies about the covid19 vaccines being "safe and effective" by the Defendants. This is detailed in Point 2 of our grounding affidavit.

There was NO informed consent for these vaccines and NO application of the Precautionary Principle under EU law and Irish law.

And this has been accompanied by a large rise in Irish people who suffer at least one illness or disability as found by the Central Statistics Office (CSO). In Census 2022 1,109,557 people (22% of the population) reported having a long-lasting condition/illness or disability, compared to 2016, when 643,131 people indicated that they had a disability

Sources: Census 2022, <https://www.cso.ie/en/releasesandpublications/ep/p-cpp4/census2022profile4-disabilityhealthandcarers/disabilityandeverydayliving/>

Census 2016, <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9d/>

The evidence clearly shows that Ireland was in Distress and is in Distress, in Winter 2022, 2023 and now in 2024, its hospitals and its GP clinics are overcrowded with those people injured and made ill by the covid vaccines and boosters in addition to those people who get ill in the Winter and Spring every year; the worst in the history of Ireland according to official state statistics. The vaccine has caused harm, loss, injury and death to thousands of living men, women and children, and this is of the utmost importance and must take precedence over all other court cases.

And we provided evidence of a similar large rise in disabilities after mass covid19 vaccinations in other countries. And new evidence has come to light in 2024 from official government bodies in Ireland and many other countries worldwide which corroborates and verifies the evidence we provided to the High Court and proves our case. According to official government sources worldwide the covid19 vaccines have caused more injuries, illnesses, disabilities and deaths than all other vaccines, and more than all other vaccines combined over the last 33 years. And this includes flu vaccines and other vaccines which were given to billions of people. One major scientific study showed a serious injury rate of 1 in 800 for covid19 vaccines.

The evidence is conclusive and points in one direction, that being mass covid19 vaccinations. Multiple correlations inside a narrow point in time across many countries all point to this. I refer the Supreme Court judges to our **Book of Causality** which contains official statistical data and scientific data from around the world. This cannot be contradicted by lies, misdirections, cover ups, suppression of the truth, and censorship of the news.

This big rise in excess deaths from 2021 to the present and rise in disability / illness includes vaccine injuries, illnesses, disabilities and premature deaths caused to the people of Ireland as defined in article 6 of the Irish Constitution also includes the Learned and Honourable Irish Judges of the various courts and/or their families and relatives and Legal Professionals and officers of the court. Surely the breaches of the Constitutional rights and international human rights of these people and the reckless endangerment of them needs to be addressed in full hearings of the Supreme Court regardless of the time and costs involved? This comes within the remit of the Common Good as defined in the Irish Constitution and the Public Interest.

In March 2024, the Irish government issued a Press Release to the press and media stating that it would

begin a covid19 vaccine compensation program for the many thousands harmed, made ill and disabled by the covid19 vaccines. This was reported in the Irish Mirror newspaper on March 5, 2024, this is **Exhibit Irish Government** for the court. Yes indeed, this is an admission of guilt by the Irish government and health authorities who claimed until recently that these vaccines were “safe and effective”. It is also a rejection and rebuttal of all of the grounds of the judgments and orders of Twomey J.

It should be pointed out that Twomey J falsely alleged that these people were “conspiracy theorists” in his judgments and orders.

This is a Public Interest case and directly impacts the Common Good as stated in the Irish Constitution and qualifies for Protective Costs. I refer the judges to our **Book of Authorities for Protective Costs**. Judges are bound by the provisions of the Irish Constitution not by personal opinions, biases, prejudices, political allegiances or errors. These are indeed ‘exceptional circumstances’. This will in the interests of justice, the Common Good and the Public Interest and the stringent requirements of the Irish Constitution require full hearings and adjudication in the Supreme Court not a cover up.

This is not some minor and insignificant matter to be casually dismissed as “conspiracy theories” by a judge. Administering a vaccine without full disclosure and without full informed consent is a criminal offence if this leads to injury, harm, loss or death to living men, women and children, and this involves the criminal offences of rape, trespass, assault, battery, poisoning, grievous bodily harm, public endangerment, manslaughter, murder, and it also a civil offence and a tort, the tort of assault and battery and the tort of deceit. And any person who aids abets, facilitates or supports in any way is guilty of an offence and they also have vicarious liability. Both the Supreme Court and High Court and their judges have a Constitutional duty and legal duty to uphold the law and they cannot permit breaches of the criminal law, the civil law and the Irish Constitution as is occurring in this court case.

To corroborate this evidence and to show the international scale of this problem, I refer the court to a British MP named Andrew Bridgen in the House of Parliament in Britain who sent a letter to the Commissioner of the London Police at Scotland Yard on February 20th 2024, asking for a criminal investigation into the handling of covid19 and the harms, illnesses and deaths caused by the covid19 vaccinations to a large number of people in Britain. He listed top scientists, medical doctors and pathologists as expert witnesses in this letter. I present this letter in the form of **Exhibit British MP** to the court. This criminal matter is now being investigated by police in Scotland Yard in London, England at the request of Andrew Bridgen MP. This was followed by Mr. Mark Sexton, a retired police officer in Britain making a statement to the police in London, England on March 8th 2024 detailing the crimes associated with the covid19 vaccinations including injuries, illnesses, disabilities and deaths caused by these vaccines ; the crime number 01/62447/24 at Acton police station, London, made on Friday 8th of March 2024. Dr. Mike Yeadon a top British scientist who worked for Pfizer and in the pharmaceutical

industry and for British military research for over 30 years presented a letter to the police in Acton police station, England supporting the statement of Mark Sexton to the police ; I present **Exhibit Dr. Yeadon** to the Supreme Court.

We have provided our evidence for this Supreme Court case to the London Metropolitan Police team in England who are investigating this aforesaid criminal case brought by Andrew Bridgen MP and Mr. Mark Sexton in Britain. We are cooperating with them in this criminal investigation and case as the crimes associated with the covid19 vaccinations are serious and extend across international borders. We have also provided the same evidence for this Supreme Court case to the European Public Prosecutor and we are cooperating with the European Public Prosecutor in relation to breaches of contract and breaches of EU law and Irish law which relate to among other things, the undisclosed adulteration of the covid19 vaccines with dangerous contaminants which are hazardous and dangerous to human health and have played a role in the high number of vaccine injuries, illnesses, disabilities and deaths caused by these vaccines.

This breach of contract also includes corruption and conflicts of interest, fraud, over buying of vaccines where €71 billion was spent securing up to 4.6 billion doses which is over 10 doses for every person in the EU and vast wastage of these vaccines amounting to over five billion euros of European taxpayers money, vaccine trial frauds, manufacturing defects, fraudulent misrepresentation, breach of the terms of the contract and breach of contract in relation to the covid19 vaccines and non disclosure of vaccine harms, deaths, ineffectiveness, ingredients and risks, denial of informed consent, refusal to apply the Precautionary Principle and the causing of massive financial and economic losses to EU member states, EU Institutions, and EU citizens. The **Reference number:** PP.00800_2024_EN. It is a most interesting investigation and case.

Central to these criminal offences and civil offences and torts are non disclosure of important and material information about the vaccines to vaccine recipients and the general public, denial of full informed consent and refusal to apply the Precautionary Principle and the corruption and conflicts of interest associated with this. The most exceptional circumstances exist in this Supreme Court case unprecedented in the history of the Irish state and in the period prior to 1922.

The right to life to life and the right to bodily integrity and the right to be fully informed about a product or procedure so that one's right to life to life and one's right to bodily integrity can be fully protected are Constitutional rights, fundamental rights, unenumerated rights and Natural law rights, and they are NOT there to be breached, to be undermined, to be crudely dismissed as "conspiracy theories" or to be ignored and to be denigrated by any Judge of any court in Ireland. This is the basis of our appeal to the Supreme Court.

Furthermore, the Irish government has failed in its Constitutional duty of care to the people of Ireland and breached several articles of the Irish Constitution. The many thousands of people harmed and damaged by the vaccine providing evidence of this failure. Under the provisions of the Irish Constitution, the Irish government are elected and put in place to serve the people of Ireland NOT the vaccine companies, the Globalists, the WHO, the WEF and foreign government entities. The evidence shows an unusual and bizarre psychology in some elected Irish politicians and ministers who suffer an obsession with pleasing foreign entities and being subservient to them at all times. A type of slavish mentality. This failure in their Constitutional duty of care to the people of Ireland is also exemplified in the Irish government's refusal since 2021 to put a compensation programme in place to compensate the many thousands of people harmed by their allegedly "safe and effective" vaccine. In contrast to this, the UK government and other western governments have had a covid19 vaccine compensation program in place since 2021 but NOT Ireland. The Irish government and elected politicians, since 2021, have been trying to "sweep this under the carpet" to hide, to conceal, to misdirect, to lie, to deflect and to deny in a similar manner to the cover up of abuse in industrial schools, mother and baby homes, Magdalene laundries, reformatories, orphanages for over 70 years.

I will restate to the court again that this includes vaccine injuries, illnesses, disabilities and premature deaths caused to the Learned Irish Judges of the various courts and/or their families and relatives and Legal Professionals and officers of the court. Surely the breaches of the Constitutional rights and international human rights of these people and the reckless endangerment of them needs to be addressed in full hearings of the Supreme Court regardless of the time and cost involved ? This comes within the remit of the Common Good as defined in the Irish Constitution and the Public Interest. These are indeed ' exceptional circumstances' . This requires full hearings and adjudication in the Supreme Court not a cover up.

The Supreme Court must act decisively now, and address the serious breaches of Irish Constitutional rights and Natural law rights and international human rights in this court case. The Supreme Court must defend the Irish Constitution against this attack, defend Natural Law rights against this attack, and defend Irish, EU and international human rights against this attack. The Supreme Court must act decisively now in a non political, non partisan, non sectarian, non class, impartial and non prejudiced manner.

The seriousness of this situation is reflected in the fact that there have been debates about this sudden massive rise in excess mortality and the harms caused by the covid19 vaccines in 2022 and 2023 and 2024 in Dail Eireann and in the British Parliament and in the US Congress and Senate and other Parliaments around the world and elected politicians have called for Inquiries or Tribunals to investigate this sudden, massive rise in excess mortality. In 2024, over 20 MP's in the House of Commons in

Britain demanded data about vaccine deaths and excess mortality from the Health secretary and health authorities, and this is due to be released later in 2014. These facts and evidence alone show the judgments and orders of Judge Michael Twomey to be in serious error, to be defective, biased, wrong and null and void. This is in our Exhibits and evidence for the Supreme Court.

The Supreme Court is bound by the Constitution and the Law to adjudicate on the matters stated above and in these exceptional circumstances to also hold full hearings of this court case, and adjudicate on the Injunction, Informed Consent, the Precautionary Principle and on the prima facie evidence from official government sources worldwide and the testimony and evidence of Expert Witnesses and Witnesses who are vaccine victims.

The Irish Constitution recognises and upholds the Natural law and there have been substantial breaches of the Natural Law rights in this case and related breaches of fundamental rights and unenumerated rights under the Irish Constitution

The most important point for the learned and honourable Judges of the Supreme Court to realise is that the non disclosure of vaccine injuries, illnesses, disabilities and types of death to vaccine recipients and the general public led to denial of informed consent for these vaccines and this led to breaches of bodily integrity and breaches of the right to life and accompanying breaches of the Irish Constitution, including fundamental rights and unenumerated rights and Natural law rights and ECHR rights and EU Charter of Fundamental rights. This was and is the basis of our pleadings and court case in the High Court and now in the Supreme Court and later in the European Court of Human Rights.

The breaches of the Natural Law rights of the people of Ireland who are referred to in article 6 of the Irish Constitution includes Irish Judges and/or their families and relatives and Legal Professionals and officers of the court , this makes this a serious legal, social and political issue of great national importance (and international importance). The Natural Law rights referenced here in this court case have been accepted to exist in the Irish Constitution prior to the Constitution itself, they are antecedent, and upheld in several court precedents in Ireland and abroad and include unenumerated rights, and these rights date back in legal and court terms to the Decretum of Gratian in the 13th century and the writings of St. Thomas Aquinas and the Magna Carta both in England and Ireland and later to the writings of Henry Bracton and later to John Fortescue in the 1400s and Edward Coke in the 1600's all of which became part of English law and court procedures which were applied and used in Ireland from the 12th century up to 1922. These Natural Law rights were codified and fortified by the writings of John Locke, and the Bill of Rights in 1689, the US Declaration of Independence in 1776, France's Declaration of the Rights of Man and the Citizen in 1789, the US Bill of Rights in 1791, the Chartist's Petition in 1838, the abolition of slavery in the USA in 1865, the UN Declaration of Human Rights in 1948 and evolved over

time to find expression in the fundamental rights and unenumerated rights in the Irish Constitution and superior court precedents affirming this in Ireland.

These Natural Law rights have been recognised and used in courts in Ireland prior to 1922 and after 1922, and in many other western countries and have led to and continue to lead to new court precedents which further refine and elucidate Natural Law rights. The ancient Brehon laws of Ireland also recognised and applied this same Natural Law in Brehon courts. These date back over 2,000 years. Precedents from Brehon law courts from the national archives and historical documents show that the Natural Law was part of Brehon law. Since Irish independence in 1922, Brehon law, the ancient law of Ireland and the Irish, have been increasingly accepted by the Irish courts and Irish legal system. And there are ongoing efforts to formalise this via new bills and laws in Dail Eireann or even a Constitutional Referendum. The ancient Brehon laws of Ireland have relevance to the Irish courts insofar as they uphold the ancient Natural Law and its rights which are universal in nature and defend the dignity and basic rights of living men, women and children. Long history has shown us that tyrants in many guises and forms have sought to destroy these rights of the people for their own personal gain, power and status.

In support of our case I rely on and cite *Ryan v Attorney General* [1965] IR 294, in the Supreme Court, 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.”

I also rely on and cite *McGee v. The Attorney General* (1974) IR 284, 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

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.

In *Ryan v Attorney General* [1965] IR 294, in the Supreme Court, Justice Kenny’s conclusion that one of the unenumerated rights protected by article 40.3 of the Irish Constitution was the right to bodily integrity. I quote the learned and honourable Judge Kenny :

‘ I understand the right to bodily integrity to mean that no mutilation of the body or any of its members may be carried out on any citizen under the authority of the law except for the good of the whole body and that no process which is or may, as a matter of probability, be dangerous or harmful to the life or

health of the citizens or any of them may be imposed I understand the right to bodily integrity to mean that no mutilation of the body or any of its members may be carried out on any citizen under the authority of the law except for the good of the whole body and that no process which is or may, as a matter of probability, be dangerous or harmful to the life or health of the citizens or any of them may be imposed ‘

This was upheld in *McGee v. The Attorney General* (1974) IR 284 giving people the right to be fully informed and provide informed consent for medicines, medical procedures, medical products, regarding their own health and protection of their bodily integrity. In *State (C) V Frawley* (1976) IR 365, the learned Justice Finlay held that the principle of the right to bodily integrity did not apply only to legislation but would also operate to prevent an act or omission of the executive which without justification would expose the health of a person to risk or danger. I quote Justice Finlay from this court case which has serious implications for the many thousands of Irish people suffering terribly from covid19 vaccine injuries, illnesses, disabilities and premature deaths:

‘I must construe the entire concept of torture, inhuman and degrading treatment and punishment as being not only evil in its consequences but evil in its purpose’

This precedent was upheld and expanded upon in *State (Richardson) V Governor Mountjoy Prison* (1980) ILRM 82 and in *State (Comerford) V Governor Mountjoy Prison* (1981) ILRM 86, 90 and *G. (D.) v. Eastern Health Board* [1997] IESC 7; [1997] 3 IR 511. More recent precedents include the Supreme Court precedents of *Gary Simpson V Governor Mountjoy Prison and others* (2019), and *Richard Sheridan V Patrick Kelly and others* (2006).

Breaches of Articles 3 and 13 of the ECHR are particularly relevant in our court case, as it covers the right to bodily integrity and right to life and the right to justice and restitution. I cite the precedents set in European Court of Human Rights, *JALLOH v. GERMANY* (2006) and *AKSOY v. TURKEY* (1996) and *Z and Others v United Kingdom* (2002) 34 EHRR and *Tarakhel v Switzerland* (2015) and ‘*Juvenile Reeducation Institute v Paraguay*, Judgment of 2 September 2004 (Preliminary Objections, Merits, Reparations and Costs) and *Aydin v Turkey* (1998) 25 EHRR and *Rahimi v Greece*, App no 8687/08 (ECtHR, 5 July 2011).

The UN Declaration of Human Rights, and the International Covenant on Civil and Political Rights (ICCPR), gives the living men, women and children in Ireland and other nations the right to be fully informed, provide their full informed consent, the right to bodily integrity, the right to government accountability in matters which affect their personal lives including actions by the government which

cause harm, injury or loss, the right to earn a living, and the right to life.

In *E (Mrs) v Eve*, [1986] 2 S.C.R. 388 ruled on by the Supreme Court of Canada, it was stated that the Constitutional right and human right to bodily integrity over-ruled *parens patriae* jurisdiction. And again this affirmed the right of a person in this case a disabled person to be fully informed and provide informed consent for medicines, medical procedures, medical products, regarding their own health and protection of their bodily integrity. This was a landmark case in Canada and is still used as precedent in courts worldwide.

This breach of the Constitutional right to bodily integrity led to further breaches of Constitutional rights including the right to earn a living. This is both a fundamental right and unenumerated right under the Irish Constitution. I cite Article 45.2.i of the Irish Constitution below:

‘ 2. The State shall, in particular, direct its policy towards securing:–

i That the citizens (all of whom, men and women equally, have the right to an adequate means of livelihood) may through their occupations find the means of making reasonable provision for their domestic needs. ‘

Many thousands of covid19 vaccinated Irish people have suffered loss of job, career, income and livelihood from the injuries, illnesses and disabilities caused by the covid19 vaccines which were promoted and administered by the government and the state who claimed that the vaccines were “safe and effective”. Furthermore the vaccine caused deaths and increased susceptibility to premature deaths and this has clearly impacted people’s right to earn a living. This is a clear breach of Article 45.2.i of the Irish Constitution. The precedent of *Ryan V Attorney General* 1965 IR 294 applies here in our case. Kenny J stated that this right exists and is an unenumerated right. The precedents of *Murtagh Properties V Cleary* 1972 IR330 and *Landers V Attorney General* 1973 109 ILTR and *Murphy V Stewart* 1973 IR 97 and *Parsons V Kavanagh* 1990 ILRM 560 confirmed this right existed, could be invoked and defended in court.

This breach of Constitutional rights must be viewed in the context of scientific and medical evidence showing there were effective medical drugs for treating and curing covid19 since June 2020. These medical drugs had been used for over 30 years and were proven to be safe and effective. And they were superior to the covid19 vaccines. But these medical drugs were deliberately censored and blocked by governments, conflicted scientific “advisors” and the press and media. This was illegal, unlawful and unconstitutional and a breach of human rights. Medical doctors, Professors of Medicine and Scientists were prepared to testify about this in the High Court but were blocked by Twomey J..

The prima facie evidence and facts from Pfizer and from official government sources and published scientific studies worldwide and sworn affidavits from medical doctors and evidence in our affidavits and exhibits given to the High Court and now the Supreme Court clearly shows that the covid19 vaccines have inflicted torture, and inhuman and degrading treatment on many thousands of Irish people and at least 5 million people in Europe according to official government and regulatory authorities. And in Ireland they have been and are being denied compensation for these vaccine injuries, illnesses, disabilities, and deaths despite the fact that other European governments and the US government are paying out compensation to victims of these vaccines. This is cruel and unusual punishment by the Irish government who publicly claimed the vaccines were “safe and effective” and encouraged these people to get vaccinated. This is a clear breach of article 40.3 and articles 40 to 44 of the Irish Constitution, including a breach of fundamental rights, unenumerated rights and Natural law rights of vaccine victims as found in the Irish Constitution and precedents set in the superior courts in Ireland.

One of the more perverse outcomes of the covid19 vaccinations is that the scientific and medical evidence shows that the vaccines have adversely affected pregnancies and unborn children and women’s reproductive cycles and health, and significantly undermined their ability to have children and start a family. This evidence is cited and referenced in our grounding affidavit and exhibits. I cite the precedents of Ryan V Attorney General 1965 and Murray V Attorney General 1985 which was upheld in the Supreme Court where the right to have children, start a family, and have a family consisting of children were upheld in the superior courts. In the High Court on the 2nd July 1985, in his judgment in the High Court, Costello J. stated that a person has a basic human right to beget children with his or her spouse and that this right is protected by Article 41 of the Constitution. There is a clear breach of article 41 of the Irish Constitution identified in our court case. Furthermore both the pregnant woman and her unborn child have a right to bodily integrity and a right to life under articles 40 to 44 of the Irish Constitution and the fundamental rights and unenumerated rights therein, and these have been breached as stated in our court case. The breach of informed consent and the Precautionary Principle identified in our court case, and which is the main purpose of our court case carries the most serious consequences in this case for women and their unborn babies and indeed their potential to have babies and a woman’s potential to start a family with her partner or spouse. This is one of the most outrageous abuses of the Constitutional rights, Natural law rights, and human rights of women and unborn children in recent times. It demands justice and remedy in the Supreme Court and the European Courts and possibly the International Criminal Court.

The precedents listed above apply in our court case, as many thousands of Irish people have suffered injuries, illnesses, disabilities and deaths from these vaccines, and the prima facie evidence clearly

shows there was non disclosure and thus no full informed consent for these vaccines. Our **Book of Authorities for the Natural Law** presented to the High Court and now the Supreme Court shows how the natural law applies in our court case and how it was breached by the Defendants and later by the Judge.

The breach of informed consent and the Precautionary Principle must also be seen in the context of coercion used by the state and its private sector cronies to force people to get the covid19 vaccination. State coercion and state sponsored private sector coercion was used to breach the Constitutional rights of the people of Ireland. This included:

- i) vaccine passports and apartheid and social exclusion for the unvaccinated
- ii) family exclusion and exclusion from important family events based on vaccination status
- iii) the incitement of hatred and violence against the unvaccinated by state employees and the government
- iv) exclusion from visiting family members in nursing homes and hospitals
- v) breaches of the criminal laws and civil laws in respect of the unlawful and unconstitutional vaccine apartheid and the aggression or violence it caused
- vi) an intense propaganda campaign in the press and media which stated the vaccines were “safe and effective”. There was no mention of the injuries, illnesses, disabilities and deaths caused by the vaccine, and this information was censored by the government via its control of RTE and its covid19 payments to the private press and media. A censorship which breached the Irish Constitution and human rights laws.
- vii) mandatory vaccinations in some workplaces and/or the threat of dismissal from a job

These measures in themselves were further breaches of the Irish Constitution and ECHR and Charter of Fundamental Rights. The facts here show that unConstitutional and unlawful measures were used to enforce breaches of Irish Constitutional rights and human rights. This is extraordinary and unprecedented !

The Constitutional right to life and right to bodily integrity rank highest in the hierarchy of Constitutional rights, and I cite the precedent of *People (DPP) V Shaw 1982 IR 1*, where Kenny J. stated this fact. And they take precedence over and have superiority over other Constitutional rights when there are clashes with other Constitutional rights. These many breaches of Constitutional rights and fundamental rights and unenumerated rights are odious, deplorable and reprehensible. They are clear breaches of the Common Good as defined in the Irish Constitution and they require remedy in the Supreme Court and/or superior courts. Indeed the breaches have acted to destroy the Common Good in Ireland. We have entered very dangerous territory in legal and Constitutional terms where the Constitutional rights and fundamental rights and unenumerated rights of the Irish people who are

defined in article 6 of the Irish Constitution can be breached, attacked, denied and undermined by a judge, and the Irish Constitution made obsolete, defunct and no longer operational in any court. The precedent set by Twomey J must be overturned and expunged from the record.

The aforementioned precedents in the Supreme Court and superior courts and in the European Courts in addition to the breaches of the Irish Constitution, EU law and international human rights law binds the hands of the Supreme Court judges in this court case in respect of setting aside or overturning the judgments and orders of Twomey J. and that this provides valid grounds for rescinding the Supreme Court judgment which relied on the judgments and orders of Twomey J.

4. . Serious abuses of court process and abuses of the courts and legal system and accompanying breaches of Judicial Regulations and the Bangalore Principles, and evidence of Bias, Prejudice and Invidious Discrimination in addition to the aforesaid breaches of the Irish Constitution, EU law and International Human Rights qualify as “Exceptional Circumstances” and grounds for setting aside or overturning these court judgments and orders

We intending to apply to the Court to vary or rescind a final judgment or order made by the Court (in this practice direction “intending applicant”) bear a very heavy onus of establishing that such circumstances exist. And the most exceptional circumstances exist as stated in the Points in this document and in the grounding affidavit.

We make application to the Supreme Court under S.I. No. 456/2023 - Rules of the Superior Courts (Order 19) 2023 which amends Rules 27 and 28 of Order 19 of the Superior Court Rules. We the Plaintiffs plead proper and valid use of the court process and courts and legal system and reasonable cause of action by us the Plaintiffs. And we plead abuse of the court process and abuse of the courts and legal system and unreasonable cause of action by Twomey J. in his proceedings and judgements and orders.

We rely on the aforesaid frauds in Point 2 including the judgements and orders of Twomey J. which were reliant on these frauds and the breaches of the Irish Constitution, EU law, Irish law and international human rights law in the points stated above are serious and fatal enough in themselves but they are worsened by Judge Michael Twomey’s abuse of court process and abuse of the courts as outlined in Point 1 of the grounding affidavit and in his breach of Superior Court Rules, and the legal principles of due process, fair procedures, audi alteram partem, due process, fair hearings, equality of arms and the Judicial Council Rules and the Bangalore Principles, and the Irish Constitution, including fundamental rights and unenumerated rights and other laws and rules as detailed in Points 1 to 29 of our

Grounding affidavit. This shows the most ‘exceptional circumstances’ exist in this court case.

Under the rules of the Superior courts and Irish law and EU and the Irish Constitution court cases are decided on the evidence, full court hearings, the witnesses, the expert witnesses and full cross examinations in court not on the blocking of evidence and witnesses and expert witnesses and full court hearings and on the biases and prejudices of a judge. This breach of article 40 of the Irish Constitution is serious and fatal to the judgments and orders of Twomey J. and must be addressed and remedied in the Supreme Court.

We were discriminated against by Twomey J in the High Court and by the registrar and court personnel in the Supreme Court. To substantiate this, the evidence shows Twomey J. wrongly compared our case to the Enoch Burke case in his orders and judgments and displayed both an ignorance of the details of the Enoch Burke case and his (Twomey J.) own political prejudices and biases which clouded his judgment and led to invidious, unreasonable, arbitrary and capricious discrimination in his judgments and orders. The judgments and orders and proceedings of Twomey J. were based on and predicated on his rants against Enoch Burke and the Burkes and his political prejudices and biases against Enoch Burke and the Burkes who had nothing to do with our court case. This politicisation of the judgment such that it is political and politically biased breaches the separation of powers, Judicial rules and laws, and the Superior Court Rules.

And this Invidious, unreasonable, arbitrary and capricious discrimination against the Plaintiffs and breach of article 40.1 of the Irish Constitution led to breaches of articles 41, 40.3, 43 and 40 to 44 of the Irish Constitution encompassing the fundamental rights and unenumerated rights of the Plaintiffs and those people who got covid19 vaccinations without full informed consent and the many thousands of Irish men, women and children injured, made ill, disabled or killed by the covid19 vaccinations.

This alone is grounds to strike down the judgments and orders of Twomey J. and the decision of the Supreme Court not to hold full hearings in this case. It is certainly a case for the referral to the Judicial Council, the Oireachtas and possibly the European courts.

I rely on and cite the US Supreme Court precedents of *Caban V Mohammed* 1974 441 US 380 and *Yick Wo V Hopkins* 1886 118 US 356. In the latter case, the following was stated by the learned Judge:

“Though the law itself be fair on its face and impartial in appearance, yet, if it is applied and administered by public authority with an evil eye and an unequal hand, so as practically to make unjust and illegal discriminations between persons in similar circumstances, material to their rights, the denial of equal justice is still within the prohibition of the Constitution....”

This statement elucidates what happened in our court case.

No provision of any court judgment, order, or law, can be obtained or created or used or manipulated in breach of or to breach the Irish Constitution, Irish laws and EU laws, and breach or deny the fundamental rights and unenumerated rights of the Plaintiffs and the parties mentioned above which are protected under articles 40 to 44 of the Irish Constitution. The Constitutionally protected fundamental rights and unenumerated rights in the Irish Constitution are superior to positive law and to the judgments and orders which breach the Irish Constitution. This is another ground for striking down the judgments and orders of Twomey J.

In support of this, I rely on and cite the precedents of

De Burca and Anderson V Attorney General 1976, IR 38

John O'Meara & Ors v The Minister for Social Protection, Ireland and the Attorney General [2024] IESC 1

McMahon V Leahy 1984 IR 525

East Donegal Co-op Ltd V Attorney General 1970 IR 317

O'B V S. 1984 316

Quinns Supermarket V Attorney General, 1972

T. O'G V Attorney General 1985 ILRM 61

which found that invidious, unreasonable, arbitrary and capricious discrimination is Unconstitutional, indeed anti Constitutional, and can be struck down, or reversed or made null and void by the court and that this can nullify the provisions of any law or judgment or order in a court case. The Irish Constitution is supreme law in Ireland and any judgment or order or law which is Unconstitutional or repugnant to the Constitution or is used or manipulated to breach the Irish Constitution and Irish Constitutional rights can be struck down, or reversed or made null and void by the court. The Supreme Court and superior courts in Ireland have and can strike down, reverse or nullify laws or part of laws or judgments or orders on the basis of discrimination or repugnancy to the Irish Constitution. In the case of laws, there is the assumption that the legislature will amend or remove or repeal or replace any such Unconstitutional laws or parts thereof. This was expressed in the Supreme Court case of Blake V Attorney General 1984 IR 117 , pages 141-142.

We rely on precedents set in Ireland and other countries which apply in our court case. We rely on and cite the precedent of Garvey V Ireland (1980) IR 75 argued in the Supreme Court where the Honourable and Learned Judges set a very strong precedent for fair procedures, fair hearings and due process which applies in our case. This caused great embarrassment to the government and State at the time. However it asserted and defended the Constitutional rights of an Irish citizen in the face of some serious wrong doing by agents of the state. This most certainly applies in our court case. The State does not have a special right to breach a person's Constitutional rights whether they are a litigant, a Plaintiff or the 21,000 people poisoned by the covid19 vaccines. I rely on and cite the Common Law concept of natural

justice which guaranteed fair procedures and due process which has been upheld in courts in Ireland and Britain for hundreds of years. In support of my case I rely on and cite the precedents of

- Moran V Attorney General 1976 IR 400
- Doupe V Limerick Co. Council 1981 ILRM 456 a
- Nolan V Irish Land Commission (1981) IR 23
- State (Williams) V Army Pensions Board (1983) IR 308
- Haughey (1971) IR 217
- S V S (1983) IR 68
- Santovsky V Kramer 1982 (US Supreme Court)

where fair procedures, fair treatment of both parties, due process, fair and impartial trials, vindication of Constitutional rights, fair decision making were found to be basic and necessary and enforceable Constitutional rights in all courts and tribunals.

I rely on and cite the US Supreme Court precedents of Caban V Mohammed 1974 441 US 380 and Yick Wo V Hopkins 1886 118 US 356. In the latter case, the following was stated by the learned Judge:

“Though the law itself be fair on its face and impartial in appearance, yet, if it is applied and administered by public authority with an evil eye and an unequal hand, so as practically to make unjust and illegal discriminations between persons in similar circumstances, material to their rights, the denial of equal justice is still within the prohibition of the Constitution....”

This statement elucidates what happened in our court case.

I also cite the ancient legal principle "Nemo Judex In Causa Sua" literally translates to "no one should be made a judge in their own cause". This means there should be NO bias of appearance of bias by the Judge in a court case. This certainly applied in our court case as Twomey J. clearly breached this legal principle. I rely on and cite the precedent of Corrigan V Land Commission (1977) IR 317, 327 which applies in our court case.

I rely on and cite the important precedent of KYPRIANOU v. CYPRUS set in the European Court of Human Rights which is relevant here to our case. In that case, a national court verdict was overturned due to absence of a fair trial and breach of ECHR rights. I also cite Goldberg V Kelly 1970 in the US Supreme Court where fair hearings and fair procedures were found to be axiomatic and self evident. In Williams v. Pennsylvania, (2016) 579 U.S. argued in the US Supreme Court a judge was forced to recuse himself due to bias. Bias itself can and has acted to deprive us of fair hearings, due process and fair procedures.

Judge Twomey refused to accept some of our electronic evidence. The evidence we have provided to the High Court conforms to the Evidence Act 1851 and the Documentary Evidence Act 1925 and the Criminal Evidence Act 1992. Electronic documents are admissible as evidence in court. The Electronic Commerce Act 2000, as amended makes provision for electronic documents as evidence in courts. Electronic documents and electronic data have been successfully used and upheld in the criminal courts, the civil courts and the superior courts in Ireland. Our evidence conforms to the following court precedents :

McCarthy v O'Flynn in the Supreme Court in 1979

Minister for Justice and the Courts Service v Information Commissioner, 2001, in the High Court in respect of electronic records and of copies.

Koger Inc. & Koger (Dublin) Ltd v. O'Donnell & Others (2010) IEHC 35

Sretaw v. Craven House Capital PLC (2017) IEHC 580;

Gallagher v. RTE(2017) IEHC 23

DPP v O'Reilly, 2007

DPP v Meehan 2006

All of this prima facie evidence above was dismissed as “conspiracy theories” in the Judge’s judgments. The Judge made no effort to determine the facts in this court case. The result was a judgment lacking facts and contained biased and prejudiced findings instead of facts. This breached the Hay V O’Grady Principles set in the Supreme Court. The Judge breached the Evidence Act 1851 and the Documentary Evidence Act 1925 and the legal principle of audi alterem partem and the law of Evidence in Ireland and Superior Court rules and aforementioned Irish and EU laws and Irish Constitutional articles. These defects in the judgments were fatal and made them void. This has a domino effect in the sense that the judgments breach the Hay v O’Grady Principles set by the Supreme Court in the sense that facts and prima facie evidence have been blocked, stopped, un-addressed and un-tested in court and replaced by biased and prejudiced findings which render the judgments flawed, erroneous, defective, and void. In our **Book of Authorities for Void Proceedings, Void Judgments and Void Orders** we detail the reasons why the Judgments and Orders of Michael Twomey of April 25th 2023 and July 12th and 19th 2023 are void ab initio.

The Judge dismissed all of this irrefutable, prima facie evidence as “conspiracy theories” and he insulted defamed and abused the litigants, this was a flagrant abuse of court process and of the High Court, the Superior Court rules, standard court procedures and Judicial rules, and legal principles and Irish and EU laws and the Irish Constitution. The Judge acted **Ultra Vires** and against all court rules, regulations and

laws and the Irish Constitution itself.

European Convention on Human Rights

ECHR fair trial civil limb quote; "Article 6 § 1 in principle requires that a court or tribunal should have jurisdiction to examine all questions of fact and law that are relevant to the dispute before it (Terra Woningen B.V. v. the Netherlands, 1996, § 52; Sigma Radio Television Ltd v. Cyprus, 2011, §§ 151-57). This means, in particular, that the court must have the power to examine point by point each of the litigant's grounds on the merits, without refusing to examine any of them, and must give clear reasons for their rejection.

As to the facts, the court must be able to re-examine those that are central to the litigant's case (Bryan v. the United Kingdom, 1995, §§ 44-45).

There were clear breaches of this by Judge Twomey.

We have provided a Book of Authorities of the Natural Law as applies in our case to the High Court.

The precedent of KYPRIANOU v. CYPRUS set in the European Court of Human Rights is relevant here. There was no impartial and fair court hearings on Informed Consent and the Precautionary Principle which was the purpose of the court case and prima facie evidence was blocked from being presented and cross examined in full court hearings, our expert witnesses and witnesses were not allowed to appear in court on behalf of the Plaintiffs. All of this was blocked by Judge Michael Twomey in the Costs hearing. In December 2022, Judge Conor Dignam made an order for court hearings on Informed Consent and the Precautionary Principle to be heard in court but this was blocked by Judge Michael Twomey. This blocking and denial of fair and impartial court hearings on Informed Consent and the Precautionary Principle was a breach of article 6 of the ECHR and was a breach of KYPRIANOU v. CYPRUS set in the European Court of Human Rights.

In addition to citing and invoking our Constitutional protections here in his case, we also cite and invoke our legal protections against malfeasance, misfeasance, conflicts of interest, injustices and corruption by those people in public office, including judges, and we invoke the protections of the following laws, Ethics in Public Office Act 1995 as amended, Standards in Public Office Act 2001, The Electoral Act 1997, The Regulation of Lobbying Act 2015, the Judicial Council Act 2019, The Bangalore Principles on Judicial Conduct, The Oireachtas (Ministerial and Parliamentary Activities) (Amendment) Act 2014, Criminal Justice (Corruption Offences) Act, 2018, Theft and Fraud Offences Act 2001, Proceeds of Crime Act 2016 as amended, Criminal Law Acts as amended, Criminal Justice Acts as amended, Offences against the State Act 1939 -1998, and Treason Act 1939.

The Superior Courts are in place to hold hearings on the substantive issue(s) and examine the evidence and facts and make an adjudication based on that NOT provide a forum for a Judge to block hearings, ignore evidence and facts and block expert witnesses and witnesses from testifying in court and provide his (the

judge's) own biased and prejudiced judgments which slander and defame the Plaintiffs.

The aforesaid precedents which we rely on and cited and the breaches of article 40 of the Irish Constitution, and the Judicial Council Regulations and Judicial Council Act 2019 and Superior Court Rules and the Bangalore Principles and the ancient legal rights to fair procedures, due process, fair hearings, audi alteram partem and equality of arms and the fact that this has been accompanied by the aforesaid breaches so the Irish Constitution and EU law and international human rights law binds the hands of the Supreme Court judges in respect of the need to declare the judgments and orders of Twomey J. in error and defective and null and void in law. And that this provides valid grounds for rescinding the Supreme Court judgment which relied on the judgments and orders of Twomey J.

5. The aforesaid breaches of the Irish Constitution and EU law, and international human rights law and other breaches of law have led to a serious and ongoing threat to and endangerment of the health of the Irish people and nation and this qualifies as “Exceptional Circumstances” and grounds for setting aside or overturning these court judgments and orders

These breaches of Irish Constitutional rights and human rights have led to further breaches in respect of dangers to the Irish nation's blood supply from mRNA and the contaminants found in the covid19 vaccines by scientists and medical doctors and published in scientific papers which have now entered the nation's blood supply via blood donations. Details of this are provided in the Grounding Affidavit. This is now a matter of the greatest urgency. Official Notice has been given by us to the Irish health authorities in accordance with Irish law and EU law. Any failure to address this problem will become an issue in this Supreme Court case and in criminal court cases.

The contamination of the Irish nation's blood supply as outlined in our grounding affidavit involves both the mRNA and the dangerous contaminants found by scientists in the vaccines and the risks include cancers, including "turbo cancers" as defined by medical doctors and Oncologists, myocarditis, pericarditis, other heart illnesses, dangerous clotting, strokes, haemorrhages, autoimmune illnesses, liver illnesses, neurological illnesses, and other serious illnesses and diseases capable of killing a person. This is on a par with the Hepatitis C scandal and contamination of blood supplies in the past. I would remind the Supreme Court judges that the British government and the Irish government apologised to the victims of this.

Our court case addressed this risk to the national blood supply in the context of informed consent and the Precautionary Principle in EU law and Irish law but this was ignored by Twomey J. Under articles 6 and 40 to 44 of the Irish Constitution, we are seeking Orders of Mandamus and Discovery from the Supreme Court compelling the Department of Health and HSE and the Irish Red Cross and the Irish

Blood Transfusion Service to take actions to safeguard the Irish nation's blood supply. In support of this

I cite one study

Transfusions of Blood Products Derived from Genetic Vaccine Recipients: Safety Concerns and
Proposals for Specific Measures

Ueda et al. 2024

<https://www.preprints.org/manuscript/202403.0881/v2>

We cite and rely on the Judgment of the European Court of Justice on the matter of the covid19 vaccines and covid19 vaccinations on July 17, 2024.

In Case T-689/21

Margrete Auken,

Tilly Metz,

Jutta Paulus,

Emilie Mosnier, as heir of Michèle Rivasi,

Kimberly van Sparrentak,

represented by B. Kloostra, lawyer,

Applicants

v

European Commission, represented by G. Gattinara and A. Spina, acting as Agents,

Defendant

I attach the judgment as **Exhibit ECJ Judgment** and **Exhibit Synopsis of ECJ Judgment**.

These are on the usb memory stick for the Supreme Court.

In September 2020, the European Commission introduced indemnification for vaccine makers in cases of "side effects." However, the European Court of Justice stated here that the liability of pharmaceutical companies cannot be limited if harm is caused by a defective product.

As regards the agreements' provisions on the indemnification of the pharmaceutical undertakings by the Member States for any damages that those undertakings would have to pay in the event of their vaccines being defective, the General Court states that **a producer is liable for the damage caused by a defect in its product and its liability cannot be limited or excluded** vis-à-vis the victim by a clause limiting, or providing an exemption from, liability under [Directive 85/374](#).

The General Court notes, however, that there is no provision in Directive 85/374 that prohibits a third party from reimbursing the damages which a producer has paid as a result of its product being defective.

I quote from the judgment of the European Court of Justice:

“ (2) *The provisions on indemnification*

151 As a preliminary point, it should be noted that, according to Articles 1 and 12 of Council Directive 85/374/EEC of 25 July 1985 on the approximation of the laws, regulations and administrative provisions of the Member States concerning liability for defective products (OJ 1985 L 210, p. 29), a producer is liable for damage caused by a defect in his product and his liability to the injured person may not be limited or excluded by a provision limiting his liability or exempting him from liability. Thus, as acknowledged by the Commission at the hearing, in the absence of an amendment of Directive 85/374, neither the Commission nor the Member States were entitled to derogate from the provisions of that directive.

152 Moreover, no provision of Directive 85/374 prohibits a third party, in this instance a Member State, from reimbursing the damages which a producer has paid on account of his product being defective.”

EU Directive 85/374 states the following about a defective product:

‘... to protect the physical well-being and property of the consumer, **the defectiveness of the product should be determined by reference not to its fitness for use but to the lack of the safety which the public at large is entitled to expect**; whereas the safety is assessed by excluding any misuse of the product not reasonable under the circumstances’

In our affidavits, evidence and submissions to the High Court and Supreme Court we identified several defects in the covid19 vaccines which caused harm, loss and injury to several million people in the Europe Union, including Ireland, and amounted to breaches of EU Directive 85/374.

In addition to this, we identified and pleaded frauds in the covid19 vaccine contract between Pfizer and the EU Commission and member states and between the Irish government and the people of Ireland in respect of covid19 vaccines. These are additional grounds for rendering the vaccine contracts and indemnifications null and void in law and making Pfizer financially accountable for the harm, loss and injury caused by their covid19 vaccines.

Furthermore, the Honourable and Learned Judges of the European Court of Justice stated that the redactions applied to the vaccine contract, to conceal information from the public and MEP’s, were not lawful

and legal, as the EU Commission had a legal duty of transparency and accountability to the people of Europe.

This raises the same question we posed to the High Court and Supreme Court, this being “how can people provide their full informed consent for a vaccination if material and important information about the vaccine was withheld and concealed ?”

The answer is obvious to everybody and to the Court. Informed consent cannot be given in such circumstances.

We, as Plaintiffs, in this Supreme Court case now cite and rely on this new precedent set in the European Court of Justice. Our Grounding Affidavit shows that the covid19 vaccines had many defects which led to loss, harm and injury to many thousands of Irish people. And this involved frauds including fraudulent claims about the vaccines and their safety and effectiveness by both the producers and the Defendants in this court case.

6. The primacy and supremacy of the Irish Constitution and Irish Constitutional rights and EU law in Ireland cannot be over-ruled by the misuse or misapplication or abuse of Superior Court Rules and related Statutory Instruments which are secondary law by a Judge. This qualifies as “Exceptional Circumstances” and grounds for setting aside or overturning these court judgments and orders

The points above invoke and rely on the Irish Constitution, EU law and international human rights law and the breaches of the Constitution and these aforesaid laws cannot absolve the many defects, errors and reliance on fraud within the judgments and orders of Twomey J. nor may he rely on misuse or misapplication or abuse of Superior Court Rules to facilitate these judgments and orders. The Irish Constitution is supreme law in Ireland and EU law is also in some designated areas supreme law in Ireland and no lesser laws or rules have the power to breach them or over-rule them.

The Supreme Court is asked here to confirm this fact in law and adjudicate on the matter.

7. The precedent of Greendale Developments Ltd. (in liquidation) or FAGAN & MALONE v. McQUAID (IN RE GREENDALE DEVELOPMENTS) applies in this court case. The Supreme Court in the Greendale case stated it has a legal and Constitutional duty to protect Constitutional rights and address and rectify any breaches of Constitutional rights. This is not about the Supreme Court intervening in or opposing government policies, it is about addressing serious breaches of the Irish Constitutional rights, Natural law rights, international human rights of the people of Ireland and holding the Irish government and state bodies to account under article 6 of the Irish Constitution. The Courts are there to uphold

truth, justice, law and the Constitution and to enforce accountability NOT to uphold errors, prejudices, bias, discrimination, judicial mistakes, breaches of Superior Court Rules, Judicial Council Guidelines, the Bangalore Principles, the Irish Constitution and the law and the defamation, slander, and the vile abuse of litigants in judgments and orders. The Supreme Court must decide between Order and the existing Chaos.

The circumstances are that, through no fault on the applicant's part, the order or judgment made operates both to deny the applicant justice and clearly to breach the applicant's Constitutional rights as per the Greendale precedent. This is detailed in

- i) the Points stated above and in the other points in this document
- ii) the Grounds and Grounding Affidavit for this Motion, numbered 1 to 29 and in the Motion itself in this document.

There is both a breach of the Constitutional rights of the Plaintiffs in this court case and the Constitutional rights of the Irish people defined under article 6 of the Irish Constitution including the many thousands of people injured, made ill or disabled or suffered premature deaths from the covid19 vaccines. People who were lied to by the Irish government and health and regulatory authorities who claimed that the vaccines were "safe and effective".

These are clear breaches of the Irish Constitution by Twomey J. and it goes much further to include breaches of international human rights and legal rights under Irish law and EU law, and breaches of the Superior Court Rules and the Bangalore Principles and Judicial Council Act 2019. Judge Michael Twomey acted Ultra Vires, making his judgments and orders null and void in law.

Not only does it deny the applicant justice under law and justice in the courts, it also denies over 21,000 Irish citizens of justice under law and justice in the courts and condemns many Irish people to death or a premature death. These living men, women and children have been damaged and suffered loss, harm, injury and even death as a result of government and defendants' lies stating the covid19 vaccine was "safe and effective" and the deliberate concealment of important and vital information from vaccine recipients which meant full informed consent was NOT given. And they are continuing to deny this and are refusing to compensate the many thousands of victims of their allegedly "safe and effective" vaccine, which is a fraud they committed against the people.

8. We the intending applicants can show cogent and substantive grounds which are objectively sufficient to enable the Court to determine that a hearing of an application on the merits is justified. This is detailed in

- i) this document, the Motion
- ii) the Grounds and Grounding Affidavit for this Motion, numbered 1 to 29.
- iii) our Exhibits for the court
- iv) our Books of Authorities
- v) Book of Causality
- vi) sworn affidavits from expert witnesses
- vii) witnesses who are vaccine victims

It is one of the most important cases heard in an Irish court. The substantive grounds include prima facie evidence from Pfizer itself and from official government sources worldwide, published scientific studies worldwide, Pathology and autopsy evidence, official documentation from the vaccine trials, the testimonies of experts such as medical doctors, medical professionals, scientists, pathologists, and statisticians and evidence from witnesses who are vaccine victims.

9. The Duty of the Supreme Court is to Defend the Irish Constitution and Irish Constitutional rights from this form of attack and Defend the Irish nation and it's people including the many thousands of people harmed and at risk from these covid9 vaccinations. The enforcement of these protections must take top priority in the Supreme Court, per Kenny J. in People (DPP) V Shaw 1982 IR 1.

It is in the interests of the administration of justice and the determination of such proceedings in a manner which is just, expeditious and likely to minimise the cost of those proceedings that full hearings are held in the Supreme Court. And that the Supreme Court fulfils its Constitutional and legal duty to Defend the Irish Constitution and Irish Constitutional rights from this form of attack.

The breach of the Constitutional rights of the Plaintiffs and indirectly the Constitutional rights of the Irish people who got the covid19 vaccination without their full informed consent and the thousands of people made injured or dead by the covid19 vaccine resulting from the actions of the Defendants and the judgments, orders and proceedings of Twomey J. is the most important factor in this appeal to the Supreme Court. This alone is grounds for overturning the judgments and orders of Twomey J. and the Supreme Court judgment which relied on the judgments and orders of Twomey J.

The evidence clearly shows that Judge Michael Twomey did not determine proceedings in a manner which was just, expeditious and cost effective. His judgments and orders were clearly unjust and have added massive costs to the Plaintiffs and to the many thousands of Irish people who suffered injuries, illnesses, disabilities and premature deaths as a result of the denial of full informed consent for the covid19 vaccines. A fraud which is monstrous in itself and in it's effects and also caused losses to the

EU Commission and EU authorities as detailed below and is now being compounded by judicial bias and prejudices and accompanying extortion. This has brought the Irish courts and legal system and administration of justice into total disrepute.

The Plaintiffs went to great expense and effort to gather official and prima facie evidence from around the world for the benefit of the court and the benefit of the Irish people and nation and for the benefit of the state, and this saved the Irish state and Irish legal authorities millions of euros. This minimised the cost of proceedings but unfortunately the proceedings were blocked by Judge Michael Twomey. We the Plaintiffs have spent hundreds of thousand euros gathering and collating prima facie evidence, expert witnesses, and witnesses and preparing legal arguments and papers so as to minimise the cost to the courts and legal system and facilitate justice for the People of Ireland in particular those people who have been injured, made ill, disabled or suffered death from these vaccines. Our research and presentation of prima facie evidence and irrefutable evidence from Ireland and around the world at considerable cost to us, has minimised the costs to the court and legal system as required under an SC17 application to the Supreme Court.

This court case is of supreme national importance affecting the Constitutional rights and human rights of all Irish people alive today and future generations of Irish people and the nation of Ireland, and this includes Judges of the Irish courts and/or their families and relatives, and indeed future judges of the Irish courts who are unborn as of today.

These vaccine injured and dead Irish people have been ignored, fobbed off, and treated disgracefully by the state and elected politicians and the Defendants who pushed these vaccines and used coercion and manipulation and vaccine passports and apartheid as stated above.

These were outrageous breaches of the Constitutional rights, Natural law rights and human rights of the Irish people. The Plaintiffs were justified in comparing this to the discrimination and abuse carried out by fascist regimes and communist regimes in the 20th century. I present as Evidence the work of Professor Mattias Desmet a Professor of Psychology at the University of Ghent (Belgium) who classified the covid19 policies and propaganda and lies and breaches of articles 15 and 29 of the Irish Constitution detailed below, and covid19 vaccinations, vaccine mandates, passports and discrimination as examples of totalitarianism similar to that of the Nazis, the Communists in the Soviet Union, especially Stalin's regime and that of the apartheid regime South Africa. I present **Exhibit Desmet** to the Supreme Court. Professor Mattias Desmet cited the works of Hannah Arendt who wrote seminal works about the evils of totalitarianism in the 20th century, including the famous piece 'Eichmann in Jerusalem: A Report on the Banality of Evil' and 'The Origins of Totalitarianism'. The totalitarian measures

imposed by the Irish government from 2020 up to 2022 in respect of covid 19 and covid19 vaccines and breaches of Constitutional rights, EU law and international human rights need to be seen in this wider context by the Supreme Court. State over-reach and executive over-reach are valid grounds for judicial intervention under the Irish Constitution and Irish law in our case. Indeed the separation of powers within the Irish Constitution is predicated on checks and balances to power and stopping and preventing this over-reach. The Supreme Court is being asked to do this in our court case, and in this Motion and grounding affidavit.

Costs have been mentioned many times in this court case in the High Court and Supreme Court. How can a court including the Supreme Court quantify in financial terms the breaches and loss of Constitutional rights, ECHR rights EU Charter of Fundamental rights, and democratic freedoms and liberties as found in this court case ? How does a court financially quantify, humanly quantify, and Constitutionally quantify the harm, loss and injury caused to over 21,000 Irish people by the covid19 vaccines and by the Defendants and indirectly by the judgments and orders of Twomey J, and the breach of the aforesaid Constitutional rights ? How does a judge, a court or anyone determine cost effectiveness in these extreme circumstances ? The Plaintiffs have incurred great financial cost and human cost in defending these same Constitutional rights and demanding justice under law

The people of Ireland are cited in article 6 of the Irish Constitution and they are sovereign and they are the supreme authority below God and they are above judges, courts and even government. This Constitutional right and the Irish Constitution itself is not something to be bought and sold in Irish courts or reduced down to “costs” as understood by the courts. The Irish Constitution and Constitutional rights are NOT there to be bought and sold and traded like commodities in Irish courts. The people of Ireland are required to be treated with respect and dignity in courts and outside them and have their fundamental rights and unenumerated rights under the Irish Constitution protected and defended in courts and outside them, not have them bought or sold, or ridiculed, blocked, and breached by judges. As Plaintiffs we have sought to defend these rights at great personal cost and financial cost.

One needs to be very careful of the setting of new court precedents in respect of this particular court case and the rights of the People of Ireland as referenced in article 6 of the Irish Constitution including Irish Judges and/or their families and relatives and who were adversely affected by these vaccines . Constitutional rights and Natural law rights cannot be amended or denied or deemed not to exist except by Referendums of the People of Ireland NOT by precedents set by Judge Michael Twomey. Nor can these rights be bought and sold in courts. This has created a Constitutional crisis which must be rectified by the Supreme Court

10. In corroboration of our facts and evidence and pleadings and case before the High Court and Supreme Court, five US states including Texas, Utah, Kansas, Mississippi, and Louisiana are suing Pfizer for knowingly concealing and hiding the fact that the vaccine caused myocarditis, pericarditis, failed pregnancies and other serious illnesses and deaths. That is 10% of US states. Fraud is being pleaded in these superior court cases. They are using the same evidence as ours in their court cases. The vaccine recipients were NOT informed and thus did not give their informed consent for these vaccines.

In support of our case before the Supreme Court, I refer to an important case being heard in a court in Kansas in the USA in 2024, titled 'State of Kansas VS Pfizer'. The Plaintiffs claim that Pfizer misled and lied to the public about it's covid19 vaccines by falsely claiming they were safe and effective, when they knew and had evidence which showed that they were not safe and not effective. Pfizer refused to disclose this evidence to the public and deliberately concealed it. This was a breach of the laws on informed consent and the Consumer Protection Laws of Kansas and the USA. This court case is very similar to our case in the High Court and now in the Supreme Court. I refer to **Exhibit Kansas Court** which is on the usb memory stick. The evidence in this court case in Kansas corroborates the evidence we presented to the High Court and Supreme Court in Ireland. We present **Exhibit Kansas Court** as additional evidence to support our case and to support our pleading of fraud against the Defendants and Twomey J. in his judgments and orders.

In support of our case I also refer to an ongoing US Supreme Court case in the USA titled :

CHILDREN'S HEALTH DEFENSE, ET AL,

Petitioners,

v.

UNITED STATES FOOD AND DRUG

ADMINISTRATION, ET AL.,

Respondents.

This Supreme Court case in the USA uses many of the legal arguments and evidence we have used in our case and addresses many of the points in our court case in Ireland and both cases affect each other. I attach **Exhibit US Supreme Court** to this document and to our proceedings. I quote from this US Supreme Court case:

‘ QUESTION PRESENTED

Whether a Constitutionally cognizable case or controversy exists under Article III when agency action causes substantial resource diversion of an organization and exposes children they represent to an

unvetted and unsafe “vaccine”, in light of this Court’s conflicting injury-in-fact standards set forth in *United States v. Students Challenging Regulatory Agency Procedures*, 412 U.S. 669 (1973) and *TransUnion LLC v. Ramirez*, 495 U.S. 413 (2021)? ’

‘ The greatest threat to a government is often itself. The most dangerous tool of government is emergency power. This case concerns the misuse of that power by Defendant Food & Drug Administration (“FDA”). By claiming emergency powers, the FDA eliminated the notice-and-comment process, ignored citizen petitions, abandoned traditional safety mechanisms for assessing drugs injected into interstate commerce, ignored express legislative limits on their actions, and now claim to be beyond judicial review. Defendants used this precarious emergency power to push dangerous drugs on minors, mislabel and misbrand those drugs to the public, knowing their mislabelling would lead these mislabeled drugs to be mandated on children as young as 5 years old. ’

This corroborates and proves our case. It also corroborates the fraud we are pleading in point 2 above. It also exposes the errors, defects, biases and prejudices and reliance on fraud in the judgments and orders of Twomey J.

11. In further corroboration of our facts and evidence and pleadings and case before the High Court and Supreme Court, I draw the learned and honourable Supreme Court Judges’ attention to the facts and evidence in a major criminal case in Switzerland where similar evidence to ours is being presented to the Swiss Prosecution authorities and criminal court by a law firm named Philip Kruse on behalf of six people injured by covid19 vaccines and thirty seven people adversely affected by these same crimes. Their criminal case is against Swissmedic, a Swiss government body. Two separate criminal reports and statements were made on

July 14, 2022

February 7, 2024

I refer the court to **Exhibit Swiss Crimes**. They have put their criminal reports and evidence on the Internet at <https://corona-complaint.ch/>

Their evidence and legal arguments are very long and detailed and precise, and very similar to the evidence and legal arguments we presented to the High Court and now to the Supreme Court. The criminal burden of proof is being used in both cases in Switzerland and Ireland. Many of the breaches of informed consent detailed in our grounding affidavit for this SC-17 application to the Supreme Court are cited by Philip Kruse and his legal team and the resulting crimes caused by this lack of informed consent including assault, battery, poisoning, grievous bodily harm, serious injury, disablement, public endangerment, financial loss, and manslaughter are also stated. The same covid19 vaccines injure, main, disable, and kill Swiss people in much the same way as they injure, main, disable and kill Irish

people. Human beings tend to have the same physiology in countries around the world. This corroborates and confirms the evidence we presented to the High Court and now the Supreme Court.

Accountability is necessary in both legal terms and Constitutional terms. These two cases contain both breaches of the criminal law and the civil law including Constitutional law, tort law and human rights law. The Supreme Court is obliged to adjudicate on all the facts and evidence in our case, including those which have been obtained from abroad and apply here in Ireland, and to defend the Irish Constitution and Irish Constitutional rights which are being breached and attacked in this case. This is now part of our evidence for this Supreme Court case, and it is labelled **Exhibit Swiss Crimes**.

12. Order / Declaration for a Stay on Supreme Court Hearings

An Order / Declaration under articles 6, 34 to 38 and 40 to 44 of the Irish Constitution to stay our Irish Supreme Court case and hearings until such time as the US Supreme Court in the USA makes a landmark decision and adjudication in

CHILDREN’S HEALTH DEFENSE, ET AL,

Petitioners,

v.

UNITED STATES FOOD AND DRUG

ADMINISTRATION, ET AL.,

Respondents.

This Supreme Court case in the USA uses many of the legal arguments and evidence we have used in our case and addresses many of the points in our court case in Ireland and both cases affect each other. I attach **Exhibit US Supreme Court** to this document and to our proceedings. I quote from this US Supreme Court case:

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Whether a Constitutionally cognizable case or controversy exists under Article III when agency action causes substantial resource diversion of an organization and exposes children they represent to an unvetted and unsafe “vaccine”, in light of this Court’s conflicting injury-in-fact standards set forth in *United States v. Students Challenging Regulatory Agency Procedures*, 412 U.S. 669 (1973) and *TransUnion LLC v. Ramirez*, 495 U.S. 413 (2021)? ’

‘ The greatest threat to a government is often itself. The most dangerous tool of government is emergency power. This case concerns the misuse of that power by Defendant Food & Drug

Administration (“FDA”). By claiming emergency powers, the FDA eliminated the notice-and-comment process, ignored citizen petitions, abandoned traditional safety mechanisms for assessing drugs injected into interstate commerce, ignored express legislative limits on their actions, and now claim to be beyond judicial review. Defendants used this precarious emergency power to push dangerous drugs on minors, mislabel and misbrand those drugs to the public, knowing their mislabelling would lead these mislabeled drugs to be mandated on children as young as 5 years old. ’

Our case comes within the legal definition of Res Integra as it has not yet been decided or is a situation that has never been encountered before. Another legal term for this is Res Nova, which means "new thing" which has not been encountered by the courts yet.

13. Under Order 39 of the Superior Court Rules and article 40 of the Irish Constitution we request the Supreme Court to accept the following:

- i) this document, the Motion
- ii) the Grounds and Grounding Affidavit for this Motion, numbered 1 to 29.
- iii) our Exhibits for the court
- iv) our Books of Authorities
- v) Book of Causality
- vi) our affidavits, exhibits and submissions made to the High Court
- vii) sworn affidavits from expert witnesses and their testimonies
- viii) witnesses who are vaccine victims and their testimonies

in full court hearings.

14. An Order / Declaration on whether or not the Pfizer covid19 vaccine can be legally considered a vaccine or a medical treatment. And the implications of this for informed consent and the Precautionary Principle in our court case and for the people of Ireland and for the Irish legal system, and for the outcome of our court case. I refer the Supreme Court judges to **Exhibit US Landmark Court Decision** detailed in the Point above.

15. In support of our case before the Supreme Court, I refer to an important landmark case in the USA involving the United States Court of Appeals. In *AAPS v. ABIM, 2024*, the learned and honourable judges of the US Court of Appeals ruled that censorship of medical doctors and medical professionals to stop them revealing scientific and medical facts about covid19 vaccines was unconstitutional, unlawful and illegal. The First Amendment rights of the US Constitution were upheld in the court. I refer the

court to **Exhibit Court of Appeals**. This has ramifications for our case before the Irish Supreme Court as Irish medical doctors were censored, blackmailed and threatened when they tried to reveal the scientific and medical facts about the covid19 vaccines and we presented this evidence to the High court. And this formed part of our legal arguments for informed consent and the Precautionary Principle in court.

16. In support of our case before the Irish Supreme Court, I refer to an official Inquiry in the British Parliament into the covid19 vaccines and their effects. The title of this Inquiry is ‘The UK Covid-19 Inquiry – Module 4 on Vaccines’ and it is being held by the British Parliament in Westminster in London in 2024 and will extend into 2025. Details of this British Parliamentary Inquiry are on the Internet at <https://covid19.public-inquiry.uk/modules/>. The evidence being presented to this Inquiry by top scientists, medical doctors, medical professionals and academics corroborate the evidence we presented to the High Court and the Supreme Court. This proves beyond reasonable doubt that the covid19 vaccines were not safe and not effective and that informed consent was not given for the covid19 vaccinations. This module 4 is due for full hearings in the British Parliament in January 2025. I refer to **Exhibit British Parliament Inquiry** which is on the usb memory stick. This Exhibit is from top scientists, medical doctors, medical professionals and academics who will present in this Parliamentary Inquiry and have already presented this same evidence to a separate body titled ‘The People’s Vaccine Inquiry’ so as to inform the general public this year .

17. An Order / Declaration under articles 6, 34 to 38 and 40 to 44 of the Irish Constitution on the prima facie evidence and Exhibits in this court case as they relate to and affect the aforesaid Constitutional rights of the people of Ireland and breaches of these same rights in the form of denial of informed consent and non application of the Precautionary Principle and the harm, loss and injury caused by this to thousands of Irish people. This is in **Exhibit for the Motion**.

The Courts in Ireland are in place to examine and test the evidence and facts and witnesses and expert witnesses and make an adjudication based on that NOT provide a forum for a Judge to ignore evidence and facts and block evidence, expert witnesses and witnesses from testifying in court and provide his (the judge’s) own biased and prejudiced judgments which slander and defame the Plaintiffs.

18. An Order / Declaration under articles 6, 34 to 38 and 40 to 44 of the Irish Constitution on Our Locus Standi or legal standing in court as detailed in the Grounding Affidavit at Point 23. The purpose of this being to rectify errors in the judgments and orders of Twomey J. and set aside his judgments and orders.

19. **Breach of the principles from *Hay v O’Grady* which were set in the Irish Supreme Court qualifies**

as “Exceptional circumstances” and grounds for setting aside the judgments and orders of Twomey J. and the Supreme Court

This is detailed in Point 20 of our grounding affidavit. This binds the hands of the Supreme Court in respect of the beaches of the Hay V O’Grady principles in this court case.

20. Breach of the Presumption of Regularity and article 45 of the Irish Constitution and Hay V O’Grady Principles which renders the judgments and orders of Twomey J. fatally flawed, defective and null and void

This is detailed in Point 22 of our grounding affidavit.

21. We seek an Order / Declaration overturning the judgments and orders of Twomey J. and the Supreme Court based on breaches of article 41.1 of the Irish Constitution in this court case. In our court case, we invoked article 41.1 of the Irish Constitution which I cite below:

‘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.’

In this invocation, we asked the High Court to impose a temporary Injunction on covid19 vaccines for children until such time as full disclosure about these vaccines were made to the public and full informed consent could be given by parents and so as to ensure compliance with article 41.1 of the Irish Constitution . We have prima facie evidence in this Motion, in our grounding affidavit and exhibits that this was not done and that the lives of children and the public have been endangered and harmed. This was and is a clear breach of article 41.1 of the Irish Constitution of the Irish Constitution by Twomey J. in his judgments and orders and by the Defendants. This has led to injury, harm and loss to thousands of Irish people.

We invoke again the protection of the family under article 41.1 of the Irish Constitution in the Supreme Court, and ask the Supreme Court to rectify this in terms of the relief stated above in this point and the four reliefs we seek as expressed in Point 1 above. We also invoke and cite the ancient legal principle and right of “restituto in integrum”.

22. We seek an Order / Declaration overturning the judgments and orders of Twomey J. and the Supreme Court based on breaches of article 6 of the Irish Constitution in this court case.

The people of Ireland are cited in article 6 of the Irish Constitution and they are sovereign and they are

the supreme authority below God and they are above judges, courts and even government. And the people of Ireland are required to be treated with respect and dignity in courts and outside them and have their fundamental rights and unenumerated rights under the Irish Constitution protected and defended in courts and outside them, not have them ridiculed, blocked, made the subject of slander and defamation, and breached by judges including Judge Michel Twomey.

21,000 people in Ireland were injured, made ill, disabled or killed by the covid19 vaccines, according to the HPRA, and the facts and evidence show that full informed consent was not given for these vaccines and the Precautionary Principle not applied. The Irish people were not afforded the Constitutional protections under article 6 of the Irish Constitution, as they were not fully informed, not fully briefed, no fully consulted and as a result they suffered harm, loss and injury and death in some cases. This constitutes a breach of article 6 by the Defendants and by Judge Michael Twomey whose judgments and orders relied on this breach and then breached this same article 6.

This is further elucidated in Point 2 and Points 1 to 29 of our Grounding Affidavit.

While the Irish government and state bodies claimed the vaccines were “safe and effective” and the scientific, medical and statistical evidence from Ireland and around the world proved they were not safe and were mostly ineffective, as seen by the constant need for so called “boosters”. This Order / Declaration we seek from the Supreme Court must state whether the Irish government and state bodies are accountable to the people of Ireland under article 6 of the Irish Constitution or not as regards the facts, evidence, findings, and statements in this document and the points numbered 1 to 29 in our grounding affidavit and exhibits. And whether extortion with menaces in the form of “costs” should be used to block this Constitutional requirement for accountability from the government and state bodies under article 6 of the Irish Constitution ?

I draw the learned and honourable Supreme Court Judges’ attention to the facts and evidence in a major criminal case in Switzerland where similar evidence to ours is being presented to the Swiss Prosecution authorities and criminal court by a law firm named Philip Kruse on behalf of six people injured by covid19 vaccines and thirty seven people adversely affected by these same crimes. Their criminal case is against Swissmedic, a Swiss government body. Two separate criminal reports and statements were made on

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I refer the court to **Exhibit Swiss Crimes**. I refer the court to **Exhibit Swiss Crimes**. They have put their criminal reports and evidence on the Internet at <https://corona-complaint.ch/>

Their evidence is very long and detailed and precise, and is very similar to the evidence we presented to

the High Court and now to the Supreme Court. The criminal burden of proof is being used in both cases in Switzerland and Ireland. Many of the breaches of informed consent detailed in our grounding affidavit for this SC-17 application to the Supreme Court are cited by Philip Kruse and his legal team and the resulting crimes caused by this lack of informed consent including assault, battery, poisoning, grievous bodily harm, serious injury, disablement, public endangerment, financial loss, and manslaughter are also stated. The same covid19 vaccines injure, maim, disable, and kill Swiss people in much the same way as they injure, maim, disable and kill Irish people. Human beings tend to have the same physiology in countries around the world. This corroborates and confirms the evidence we presented to the High Court and now the Supreme Court.

Accountability is necessary in both legal terms and Constitutional terms. These two cases contain both breaches of the criminal law and the civil law including Constitutional law, tort law and human rights law. The Supreme Court is obliged to adjudicate on all the facts and evidence in our case, including those which have been obtained from abroad and apply here in Ireland, and to defend the Irish Constitution and Irish Constitutional rights which are being breached and attacked in this case. This is now part of our evidence for this Supreme Court case, and it is labelled **Exhibit Swiss Crimes**.

The duty of the Supreme Court is clear here, it must rectify these breaches of article 6 of the Irish Constitution. We also invoke and cite the ancient legal principle and right of “restituto in integrum”.

- 23.** An Order / Declaration on the **Common Good** as stated in the Irish Constitution in respect of
- (i) 21,000 Irish people who suffered injuries, illnesses, disabilities or deaths from the covid19 vaccines according to the HPRA. By May 2024, VAERS of CDC reported that the covid19 vaccines had killed 37,647 people and injured 1.6 million people in the USA. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit VAERS 2024**. By February 2023, Eudravigilance of the European Medicines Agency in Europe reported that the covid19 vaccines had killed over 50,000 people and injured over 5 million people. Many of these injuries and illnesses were serious and life threatening requiring hospitalizations and life altering. I refer the Supreme Court to **Exhibit Eudravigilance 2024**.

This was deliberately hidden and concealed from the general public and vaccine recipients. The general public were duped with lies about the covid19 vaccines being “safe and effective” by the Defendants. This is detailed in Point 2 of our grounding affidavit.

- (ii) the proven ineffectiveness of the covid19 vaccines as stated in our grounding affidavit and exhibits
- (iii) the denial of effective medical drugs and treatments to treat and cure covid19 since June 2020 when they became publicly known so as to create artificial desperation and a false and artificial demand for covid19 vaccines.

There was NO informed consent for these vaccines and NO application of the Precautionary Principle under EU law and Irish law.

I rely on and cite the reference to the Common Good in the Irish Constitution :

‘And seeking to promote the common good, with due observance of Prudence, Justice and Charity, so that the dignity and freedom of the individual may be assured, true social order attained’

The Supreme Court is being asked to please specify and quantify how points (i) to (iii) above serves the ‘Common Good’ as defined in the Irish Constitution ? And to specify how a sudden and massive increase in excess mortality in Ireland after mass covid19 vaccinations serves the Common Good ? and relate this to the fact that the evidence from official government bodies worldwide also show the same sudden and massive increase in excess mortality in Ireland after mass covid19 vaccinations

Furthermore, this court case affects the lives of many thousands of living Irish men, women and children and was taken and is being taken in the Public Interest and to serve the Common Good and thus qualified and qualifies for a Protective Costs Order. This right derives from the Constitution itself and not from Twomey J.. I refer the Supreme Court to our **Book of Authorities for Protective Costs**. The Irish Constitution is supreme law existing above and over-ruling the views of any one man or woman whether a judge or a litigant or member of the public.

On this point we seek the following:

(a) We seek an Order / Declaration by the Supreme Court granting of Protective Costs in this court case for both the High Court and Supreme Court. We also seek an Accompanying Order / Declaration on whether or not Irish Constitutional rights are for sale in relation to the imposition of costs for invoking these Constitutional rights and defending and protecting these rights and protecting the Common Good as defined in the Irish Constitution, and also defending against the breach of these same rights in the High Court.

(b) We seek an Order / Declaration overturning the High Court Judgment and Orders of the Learned Judge Michael Twomey of the High Court, record number 2022/1456 P, on the basis of his undermining of the Common Good and breaching of the Irish Constitution. And on the basis of fundamental errors, evidence of bias and prejudice, breaches of law, the judicial rules, ancient legal principles, and the Irish Constitution, acting Ultra Vires, and the frauds detailed in Point above and in grounds 1 to 29 in our Grounding Affidavit when viewed in totality attack the Common Good and seek to undermine and

demolish the Common Good. And that these Judgments and Orders are null and void in law on these grounds and the grounds stated 1 to 29 below and numbered and detailed in our Grounding affidavit..

These breaches of Constitutional rights and fundamental rights and unenumerated rights are odious, deplorable and reprehensible. They are clear breaches of the Common Good as defined in the Irish Constitution and they require remedy in the Supreme Court and/or superior courts. I refer to the extra curial statements of Judge Declan Costello of the High Court and ex President of the High Court on the 'Common Good' where he stated that

“the protection of basic rights is one of the objects which the common good is intended to assure”

Source: Declan Costello "Limiting Rights Constitutionally" in James O'Reilly (ed) Human Rights and Constitutional Law: Essays in Honour of Brian Walsh (Round Hall Press, Dublin, 1992) 177;

We have entered very dangerous territory in legal and Constitutional terms where the Common Good can be attacked and undermined in such a manner, even in the courts, and the sacred Constitutional rights and fundamental rights and unenumerated rights of the Irish people who are defined in article 6 of the Irish Constitution can be breached, attacked, denied and undermined by a government, state bodies and by a judge.

24. An Order / Declaration under articles 29, 6 and 40 to 44 of the Irish Constitution and ECHR and EU Charter of Fundamental Rights and the Nuremberg Code on whether or not the Nuremberg Code applies in this court case and throughout Ireland in consideration of the fact that:

(a) there was no full informed consent for these vaccines as stated in our Grounding Affidavit and exhibits

(b) over 21,000 people in Ireland have suffered injuries, illnesses, disabilities and deaths from the covid19 vaccines according to the HPRA and evidence from government bodies worldwide show that millions of people worldwide have suffered have suffered injuries, illnesses, disabilities and deaths from the covid19 vaccines. And our prima facie evidence from the CSO, GRO, RIP.ie, Eurostat, Euromomo and OECD show a sudden and massive increase in excess mortality after mass covid19 vaccinations in Spring 2021 in Ireland and in other highly vaccinated countries during this time and this has lasted up until the end of 2023. And scientific evidence and official government statistical evidence showing a close link between mass covid19 vaccinations in Spring and Summer 2021 and a sudden and massive rise in excess mortality from May 2021 until the end of 2023. And the large rise in Irish people who suffer at least one illness or disability as found by the Central Statistics Office (CSO). In Census 2022 1,109,557 people (22% of the population) reported having a long-lasting condition/illness or disability, compared to 2016 , when 643,131 people indicated that they had a disability

Sources: Census 2022, <https://www.cso.ie/en/releasesandpublications/ep/p-cpp4/census2022profile4->

25. An Order / Declaration and an Order of Discovery under articles 6, 40, 38, 34 to 37, and 40 to 44 of the Irish Constitution on the locus standi or legal standing of the Defendants and the Plaintiffs in this court case and the Constitutional status and standing of the Defendants and the Plaintiffs in this court case in relation to evidence showing that the Defendants and the Plaintiffs and the court itself may be unknowingly, secretly, and unwittingly considered to be 'corporations' and 'trusts' of which nothing or very little is known. The Irish government is registered as a private corporation and involved in business and profit making and is listed as such on Dun and Bradstreet. And the title of said corporation is

' THE GOVERNMENT OF IRELAND '

and the Taoiseach Leo Varadkar is listed as the Key Principal.

This is viewable on the Dun and Bradstreet web site at [https://www.dnb.com/business-directory/company-profiles.the_government_of_ireland.2991a23d3156f21d056fd130e910ebbe.html](https://www.dnb.com/business-directory/company-profiles/the-government-of-ireland.2991a23d3156f21d056fd130e910ebbe.html)

This suggests that the Irish government is a profit making private corporation which serves its own private corporate interests and its shareholders. The shareholders are undisclosed. There is NO provision in the Irish Constitution for registering the Irish government as a private corporation and its use as a private business for making profit.

This raises some very important questions such as

- (a) are Irish laws created to serve the profit interests of this private corporation and its executives and owners OR are they created to serve the people of Ireland as defined in article 6 of the Irish Constitution ?
- (b) are Irish government policies serving these profit interests of the corporation or are they serving the people of Ireland as defined in article 6 of the Irish Constitution ?
- (c) in any clash between the profit interests of this corporation and Irish Constitutional rights, do the profit interests take precedence ?

All of this has NOT been publicly disclosed to the general public in Ireland. There is a direct conflict here between the Irish Constitution and the government of Ireland registered as a private corporation engaged in business and profit making and serving its shareholders and investors and bondholders instead of serving the people of Ireland as stated in the Irish Constitution and upholding the Constitutional rights of the Irish people. These appear to be breaches of articles 28, 16 to 27, 6 and 39 of the Irish Constitution. These are both civil offences and criminal offences.

Did this private corporation and its privileged members benefit financially from mass covid19 vaccinations ? and from enforcing vaccine passports ? and from covid19 lockdown laws ? does service to these corporate interests over-ride service to the people of Ireland ?

Has the government of Ireland become a profit making entity, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ?

Are the taxes paid by the people of Ireland given to this corporation as part of their profit making and business operations and banking operations ? Corporations require contracts and full disclosure of the terms of the contract and the parties involved ; has this been done or not ?

Order / Declaration on the status and standing of the following public bodies numbered (i) to (v) below and the impact of this on the Irish Constitution :

(i) The Chief State Solicitor's Office which represents one of the Defendants in this court case. The Chief State Solicitor's Office is registered as a private corporation and involved in business and profit making and serving its shareholders and investors and bondholders and is listed as such on Dun and Bradstreet. And the title of said corporation is

' Chief State Solicitors Office'

and Adam Wickham_ is listed as the Key Principal. This is viewable at

https://www.dnb.com/business-directory/company-profiles.chief_state_solicitors_office.bf9ae01e96d27fdb00aff1409e4adf80.html#contact-anchor

Has the Chief State Solicitors Office become a profit making private corporation, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ?

There is NO provision for this in the Irish Constitution and there appears to be breaches of the Irish Constitution here.

(ii) The Minister for Health is a party to these court proceedings and his own department is registered as a private corporation and involved in business and profit making and this is viewable at

https://www.dnb.com/business-directory/company-profiles.department_of_health.01431f3646e822bdf52e70a298e6b61.html

and it is titled

DEPARTMENT OF HEALTH

and its key Principal is Anne Hickey.

Has the Department of Health become a profit making private corporation, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ?

There is NO provision for this in the Irish Constitution and there appears to be breaches of the Irish Constitution here.

(iii) The head of the HSE is a party to these court proceedings and his organisation the HSE is registered as a private corporation and involved in business and profit making and serving its shareholders and investors and bondholders and this is viewable at

https://www.dnb.com/business-directory/company-profiles.health_service_executive.c7718b9f050232454a625f6f6e2c745b.html

and it is titled

HEALTH SERVICE EXECUTIVE

and its key Principal is S de Burca

Has the Health Service Executive become a profit making private corporation, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ?

There is NO provision for this in the Irish Constitution and there appears to be breaches of the Irish Constitution here.

(iv) Furthermore, 'The Courts Service of Ireland' is registered as a private corporation and involved in business and profit making and serving its shareholders and investors and bondholders and this is viewable at

https://www.dnb.com/business-directory/company-profiles.the_courts_service_of_ireland.58ed04679a266ca9d7c57aa5bf1261e8.html

Has the Courts Service become a profit making private corporation, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ? Are fines, charges and sentences being issued for profit ?

There is NO provision for this in the Irish Constitution and there appears to be breaches of the Irish Constitution here.

(v) The Garda Siochana who were responsible for enforcing the laws of this private corporation, including vaccine passports, and the lockdowns laws and severe social restrictions are also registered as a private corporation and involved in business and profit making and serving its shareholders and investors and bondholders. This is titled

' GARDA SIOCHANA '

on Dun and Bradstreet and Adam Ross is the Key principal.

This viewable on the Dun and Bradstreet web site at https://www.dnb.com/business-directory/company-profiles.garda_siochana.9b826edfaf7dec3469c754541ecb18e4.html

Have the garda Siochana become a profit making private corporation, determined to make profits at the expense of breaching the Irish Constitution and Irish Constitutional rights and Irish laws and EU laws ? Are fines, charges and sentences being issued for profit ?

There is NO provision for this in the Irish Constitution and there appears to be breaches of the Irish Constitution here.

Did these private corporations involved in business and profit making and serving its shareholders and investors and bondholders benefit and profit financially from mass covid19 vaccinations ? and from enforcing vaccine passports ? and enforcing vaccine mandates in workplaces ? and from the harms and illnesses caused by the covid19 vaccines ? and from covid19 lockdown laws and from laws in general ? If so, these appear to be breaches of articles 28, 16 to 27, 6 and 39 of the Irish Constitution. These are both civil offences and criminal offences.

In respect of the above and its impact on this court case and on the Irish Constitution and Irish Constitutional rights, we seek Declarations / Orders under article 6 of the Irish Constitution from the Supreme Court as stated above.

And we seek an Order of Discovery under article 6 of the Irish Constitution as to whether or not the Plaintiffs and the people of Ireland are unwittingly, secretly and unknowingly registered as corporations and trusts and being used as corporations and trusts and whether or not the birth certificates of the Plaintiffs and the people of Ireland are being used to facilitate this registration and use of people as corporations and trusts. And whether or not these private corporations or securities are traded on exchanges for profit ? and who exactly is profiteering from this ? Corporations and Trusts require contracts and full disclosure of the terms of the contract and the parties involved ; has this been done or not ? There is no provision for this undisclosed registering and use of living men and women and children as corporations in the Irish Constitution. And there is no provision in the Irish Constitution for using living men, women and children as undisclosed corporations and trusts in Irish courts.

If Irish people are registered and have the status of corporations in courts and outside courts then they have NO Constitutional rights and NO human rights. If so, this has reduced the living men, women and children of Ireland down to the status of slaves and chattel with no rights. If so, these appear to be breaches of articles 40 to 44 and 6 and 39 of the Irish Constitution. If so, this non disclosure would constitute the crime of fraud, a fraudulent contract and fraudulent representation. All of these are both civil offences and criminal offences.

The Supreme Court is being asked here if these undisclosed and secret corporations and trusts masquerading as living men, women and children exist, and if so how this conflicts with the Irish

Constitution and fundamental rights and unenumerated rights and human rights which apply to living men, women and children

26. Under articles 6 and 40 to 44 of the Irish Constitution, we seek Orders of Discovery in relation to the accountability to the people of Ireland by the government, the Oireachtas and state bodies and civil servants, and the protection of the right to life and to bodily integrity in relation to the following:

(i) compelling the HPRA and Department of Health and HSE and the GRO to release all death data and excess mortality data at record level and made anonymous to comply with GDPR from March 2021 to March 2024 showing the vaccination status of all those people who died and the causes of death including “sudden deaths”. And this to include all persons who died within 1 month, and 2 to 12 months and 24 months of getting the covid19 vaccine and/boosters(s). And this to include the percentage of “sudden deaths” who were covid19 vaccinated. And to categorise all of these deaths by age, prior conditions, co-existing illnesses, and vaccination status. And this to include lost pregnancies in covid19 vaccinated women.

(ii) the level of overcrowding in accident and emergencies in all hospitals and in hospital wards from March 2021 to March 2024 and the percentage of this caused by covid19 vaccinated people.

(iii) the percentage of people who got ‘Long Covid’ who were vaccinated with covid19 vaccines. And a medical and scientific analysis of what is known as ‘Long Vaccine’ relating to the harms caused by the covid19 vaccines and whether or not this has anything to do with ‘Long Covid’.

This is a reasonable and valid request considering the fact that one important scientific study in 2024 showed that 96.7% of long COVID sufferers had received the covid19 vaccine and/or boosters. I cite the study :

Long-COVID Prevalence and Its Association with Health Outcomes in the Post-Vaccine and Antiviral Availability Era
Jangnin et al. 2024

27. These breaches of Irish Constitutional rights have led to further breaches in respect of dangers to the Irish nation’s blood supply from mRNA and the contaminants found in the covid19 vaccines by scientists and medical doctors and published in scientific papers which have now entered the nation’s blood supply via blood donations. This is cited in Point 2 of our grounding affidavit. These risks include cancers, myocarditis, pericarditis, dangerous clotting, strokes, autoimmune illnesses, and other serious illnesses and diseases. This is on a par with the Hepatitis C scandal and contamination of blood supplies in the past. In support of this I cite the following study
Transfusions of Blood Products Derived from Genetic Vaccine Recipients: Safety Concerns and

Our court case addressed this risk to the national blood supply in the context of informed consent and the Precautionary Principle in EU law and Irish law but this was ignored by Twomey J.

Under articles 6 and 40 to 44 of the Irish Constitution, we seek Orders of Mandamus and Discovery from the Supreme Court compelling the Department of Health and HSE and the Irish Red Cross and the Irish Blood Transfusion Service to :

- (i) carry out independent, impartial, and thorough blood testing to ensure the nation's blood supply is not contaminated with spike proteins, mRNA, foreign DNA, sv40, graphene oxide, and other vaccine contaminants from the covid19 vaccines
- (ii) test for abnormal blood clotting, and artery blockage testing and vein blockage testing of covid19 vaccinated people and unvaccinated people to establish the differences between them and shed more light on international scientific findings in this area.
- (iii) And provide these findings to the court, the Oireachtas, the President and the general public and the press and media, including mandatory publication of this in the Irish press and media.

28. Under articles 6 and 40 to 44 of the Irish Constitution, we seek Orders of Mandamus from the Supreme Court compelling coroners and pathologists to carry out autopsies on young covid19 vaccinated people under 40 who died suddenly and that they use the pathology protocols developed by Dr. Arne Burkhardt in Germany. And that the results of this are made publicly known in the press and media.

The protection of Constitutional rights and of the Constitution itself being the main factor in this particular request.

29. Further Elucidation of the Pleading of Fraud. And Order / Declaration for a Stay on Supreme Court Hearings

We have evidence that the judgments and orders of Twomey J. relied upon a fraudulent instrument, a fraud, and an invalid claim by the Judge in his Judgment and that this renders the judgments and orders of Twomey J. reliant on fraud and based on fraud and thus defective and flawed and null and void in law. We seek an Order / Declaration for a Stay on our Irish Supreme Court case and hearings until such time as Pat Clohessy's SC17 case in the Supreme Court and case in the Court of Appeal involving the non commencement of the Courts of Justice Act 1924 have been adjudicated on and completed. We have used and are using the same pleadings and most of the evidence and legal arguments presented by Pat

Clohessy to the Supreme Court and Court of Appeal in this case.

In High Court case, record number 2022/1456 P, a judgment was delivered by Judge Michael Twomey on July 12th 2023 and an order issued on July 19th 2023. In his judgment and order of July 2023 Judge Michael Twomey falsely stated that the Courts of Justice Act 1924 was fully commenced in 1924 and signed and sealed in 1924 and was fully valid and he provided a false instrument to support this and breached the Criminal Justice Act 2001 and the Criminal Justice (Corruption Offences) Act 2018 and the Documentary Evidence Act 1925 and the Forgery Act 1913 and the Ministers and Secretaries Act 1924. Both the judgment and order by Judge Michael Twomey relied upon a fraudulent instrument published in Iris Oifigiuil. I refer to **Exhibit Judgment and Order** which is a folder on the usb stick. That fraudulent instrument stated that the Courts of Justice Act had been fully commenced in 1924 and that Commencement order number 1 specifically and all commencement orders had been commenced, signed and sealed in 1924 specifically before September 12th 1924 as required in the Act. I and the other Plaintiffs have documentary evidence to prove beyond reasonable doubt that this did not occur in 1924, and did not occur by September 12th 1924. Thus the provisions of the Act were not met and were breached and the Courts of Justice Act was not fully commenced and not enforced. This is a fact acknowledged in the Supreme Court by the ex Chief Justice Frank Clarke who stated in the Supreme Court in 2018

"I appreciate if there isn't a Commencement Order, then the Act isn't enforced". I refer to **Exhibit Clarke** and **Exhibit Clohessy Book**. There is also a letter from the Attorney General of Ireland from June 24th 2021 confirming that no Courts of Justice Act 1924 enactment order exists. Copy of this letter was presented to the Court of Appeal by Patrick Clohessy in his case.

I present evidence in the form of **Exhibit Clohessy Book** on the memory stick titled 'In "HOT PURSUIT" of lawful justice during 99 years of illegal Irish Statutory Courts.'

which is a book written by Patrick Clohessy in 2024 detailing the evidence showing non commencement of the Courts of Justice Act 1924 and the retrospective signing and sealing in March 1926, and the use of fraudulent instrument to falsely claim the act had been fully commenced in 1924. Official Irish government letters, memos, and correspondence at the time and in the late 1920's, 1930's and 1940's corroborate this non commencement of the Courts of Justice Act 1924. I refer to **Exhibit Clohessy Book** at **pages 309 and 203** where the Attorney General of Ireland on August 30th 1941 confirmed these defects and flaws in the Courts of Justice Act 1924. They never rectified this problem, but they did acknowledge their guilt in their correspondence. They greatly feared public exposure of their fraud and lies. Clohessy presents prima facie evidence to prove that the Irish courts were NOT legally and lawfully set up in 1924. This non commencement of the Courts of Justice Act 1924 fatally infected other

laws after 1924 up to the present day. This non commenced and invalid law failed to pass the provisions set in articles 50 and 58 of the Irish Constitution, and was NOT consistent with the Irish Constitution of 1937 and is thus unconstitutional.

I and the other Plaintiffs have prima facie evidence to show that that the government seal was delivered to the Irish government from the Royal Mint on March 12th 1926. The draft not original Commencement order number 1 of the Courts of Justice Act was retrospectively signed and sealed on or after March 12th 1926 NOT in 1924. This was then misrepresented to the general public and the people of Ireland as being the original signed and sealed and commenced in 1924, that is before September 12th 1924. Iris Oifigiuil published this fraudulent document or fraudulent instrument and falsely alleged that it was genuine and commenced, signed and sealed before September 12th 1924. Retrospective sealing and signing of and accompanying misrepresentation of any official government document, law, order, contract or agreement is fraud and a crime and there are court precedents for this. I refer to **Exhibit Commencement Order** and **Exhibit Fraudulent Seals**. Official government correspondence in the 1920's, 1930's, 1940's, 1950's and 1960's confirmed that the Irish government and ministers and politicians and senior civil servants and some senior British government officials knew about this fraud and the defects it created in the Courts of Justice act 1924 and were anxious to rectify it.

Under Irish law, fraud nullifies and vitiates everything including court judgments and orders which rely on fraud. I cite the precedent of *Lazarus Estates vs Beasley* 1956 and the famous judgment of Judge Lord Denning that 'Fraud vitiates everything' and unravels contracts, indemnities, judgments, orders, policies, etc.. This judgment was upheld and fraud was further defined in *Gracefield VS Takhur*, 2019, before the Supreme Court in the UK. Both of these precedents apply in our court case. I refer to **Exhibit Fraudulent Seals** and **Exhibit Void Judgments** which provides the laws and precedents which apply here.

Point 19 in our Grounding Affidavit further elucidates this point.

This means that in the following order of invalidated Acts by reason of unenforced Commencement Orders and an Unsealed Act, there exists by known events (proven facts) a result of no lawful Statutory Courts, and no lawful jurisdiction, that being power for judges to hear cases.

1. Ministers and Secretaries Act 1924 invalid on 2nd June 1924 as stated in Point 2, pages 30 to 32 above
2. The Courts of Justice Act 1924 invalid on 4th June 1924 because Ministers had no power to validate it and the Act was not signed and sealed and commenced before September 12th 1924.
3. Various Courts of Justice Acts 1926, 1928, 1936, 1947, 1953 etc. etc and Court Officers Act 1926

invalid because Ministers had no power to validate and the Principal Act (1924 Courts of Justice Act) which they relied upon was invalid

4. Courts (Establishment and Constitution) Act 1961, and its companion Courts (Supplemental Provisions) Act 1961 invalid on 29th September 1961, because Prime Minister Sean Lemass had no power to commence both Acts pursuant to Sections 1&16 of the invalid Ministers and Secretaries Act 1924 and the Principal Act (1924 Courts of Justice Act) which they relied upon was invalid.

The source of power (which is invalid) to this present day used by the government is the Ministers and Secretaries Act 1924.

Point 19 in our Grounding Affidavit further elucidates this point.

Our case comes within the legal definition of Res Integra as it has not yet been decided or is a situation that has never been encountered before. Another legal term for this is Res Nova, which means "new thing" which has not been encountered by the courts yet.

30. An Order / Declaration under articles 6, and 40 to 44 of the Irish Constitution on whether the mRNA covid19 vaccines of Pfizer and Moderna can be legally, medically and scientifically classified as “vaccines” or “genetically modified organisms” or “GMO’s” in light of new scientific evidence and court cases. This is further elucidated in Point 2 of the grounding affidavit.

31. The Breaches of the Law of Equity in this court case

Both the Supreme Court and High Court are courts of equity having integrated the law of equity at their establishment or creation. The law of equity has existed for many centuries prior to this and is inherited by the Irish state at its inception and the case law is centuries old. Our case before the High court and Supreme Court requires the application of the law of equity. One of the most important maxims of equity is that ‘ equity will not suffer wrong without a remedy’ and we have been denied and blocked remedy in the High Court and Supreme Court, a remedy predicated on informed consent and the Precautionary Principle as outlined in points 1 to 29 in our Grounding Affidavit, and this has led to many thousands of Irish people being damaged by the covid19 vaccines without their full informed consent and application of the Precautionary Principle, and they have been indirectly denied and blocked remedy in the High Court and Supreme Court. The legal system and courts in Ireland act to block, stop, undermine and deprive people of their Constitutional rights to justice under law and the right to equity under law through

- (i) extortionate costs and/or threats of such and the weaponisation of such to deny rights
- (ii) judgments on cases without full court hearings. Biased judgments and refusal to allow full court hearings on the substantive issues of the court case namely informed consent and the Precautionary Principle and follow court procedures and rules, judicial rules and guidelines, legal principles, the law,

the Constitution and the maxims of equity accompanied by the weaponisation of costs and (iii) no accountability in the legal system and courts and the use of the weaponisation of costs to enforce this lack of accountability

This is worsened by the fact that damaged and seriously ill living men, women and children have to challenge the state which has many millions of euros of taxpayer's money to fight them and deny them justice in the courts. This is the weaponisation of taxpayer's money to direct attack the article 6 and articles 40 to 44 Constitutional rights of the Irish people. This is both unlawful and illegal.

There is vast inequality of arms in the Irish superior courts which is depriving the Irish people of their Constitutional rights and human rights. Another maxim 'Equity is a sort of equality or Aequitas est quasi aequalitas' is being breached here. The legal system and courts, as they presently exist, actively deprives the Irish people of their Constitutional rights and human rights and their rights under the law of equity. This great wrong requires remedy in the Supreme Court and if necessary in the European Courts and International Criminal Court.

The two most important maxims are 'One who seeks equity must do equity' and 'He who comes into equity must come with clean hands'. We tried to get full court hearings on informed consent and the Precautionary principle using prima facie evidence from Pfizer itself and from regulatory bodies in Ireland and other countries and over 3,000 published and peer reviewed scientific studies. The purpose of this case being to protect the Constitutional rights of the Irish people, including the right to bodily integrity and right to life and right to earn a living and right to a family life at articles 6, and 40 to 44 of the Irish Constitution. We have done equity, have clean hands and have acted within the law of equity. The opposing side in this court case may NOT have clean hands when one considers that the vaccine that they claimed was "safe" has caused many thousands of people to suffer vaccine injuries, illnesses, disabilities and deaths and is a contributing factor to the massive and sudden rise in excess mortality after mass covid19 vaccinations in Spring 2021.

The second maxim of equity is 'Equity regards as done what ought to have been done'. Informed consent should have been attained from the people of Ireland and the Precautionary Principle applied and measures should have been put in place in 2021 and 2022 to protect the people of Ireland. This would have prevented the many thousands of vaccine injuries, illnesses, disabilities and deaths and the massive and sudden rise in excess mortality after mass covid19 vaccinations. This was NOT done but ought to have been done. Equity demands Specific Performance, and this is outlined in this document and in the Grounding Affidavit.

Another maxim is that 'Equity will not allow a wrongdoer to profit by a wrong'. So far, the wrong doers

have made massive profits and income gains and other forms of financial gain and career advancement while many thousands of Irish people have suffered loss, harm, injury and premature death from this. The law of equity cries out for justice in this case. A related maxim is that ‘ Equity will not allow a statute to be used as a cloak for fraud’.

Another maxim is ‘Equity does not require an idle gesture’. The deliberate and calculated ignoring of the many thousands of people harmed or killed by the covid19 vaccines and their families and the use of ‘gaslighting’ against them shows the true intent of the defendants and the Irish government and health and regulatory authorities. This shows an ‘idle gesture’ to the people of Ireland who suffered harm, loss, injury or death from the covid vaccines and the defendants required equity for that and Judge Michael Twomey gave them that.

Equity follows the laws. The breaches of the Irish Constitution which is supreme law, and breaches of national and international human rights and breaches of the laws on informed consent and the Precautionary Principle, breaches of the Natural law and Nuremberg Code all require an equitable remedy as requested by us. This equitable remedy is detailed in this document and in the Grounding Affidavit.

Equity acts in personam. We have requested that individuals working in the government and state bodies and executives inside the vaccine companies be held personally accountable for their actions . And that the veil of corporation sole and the indemnity for vaccine corporations be lifted due to fraud and wrong doing and breaches of Constitutional rights and human rights and Irish and EU laws, and the Nuremberg Code. A related maxim is that ‘ Equity will not allow a statute to be used as a cloak for fraud’.

32. An Order / Declaration under articles 6 and 40 to 44 of the Irish Constitution on the evidence on malfeasance, misfeasance, conflicts of interest, injustices and corruption by those people in public office who were involved in imposing the unConstitutional, unlawful and illegal covid19 lockdowns and mass vaccinations without full informed consent and application of the Precautionary Principle , and which include breaches of the following laws, Ethics in Public Office Act 1995 as amended, Standards in Public Office Act 2001, The Electoral Act 1997, The Regulation of Lobbying Act 2015, the Judicial Council Act 2019, The Bangalore Principles on Judicial Conduct, The Oireachtas (Ministerial and Parliamentary Activities) (Amendment) Act 2014, Criminal Justice (Corruption Offences) Act, 2018, Theft and Fraud Offences Act 2001, Proceeds of Crime Act 2016 as amended, Criminal Law Acts as amended, Criminal Justice Acts as amended, Offences against the State Act 1939 -1998, and Treason Act 1939.

33. An Order / Declaration under the Irish Constitution as to Contempt of the Irish Constitution in relation to the breaches of the Irish Constitution detailed in this document and in our grounding affidavit. This document cites many breaches of the Irish Constitution and Constitutional rights and indeed subversion of the Irish Constitution by some politicians and state employees who falsely presume to have such powers. And an Order / Declaration as to Contempt of the Oireachtas in relation to the breaches of the Constitutional powers, standing, dignity and status of the Oireachtas and the Irish Constitution as detailed in this document and in our grounding affidavit. No living man or woman or citizen or entity has special permission to breach and subvert the Irish Constitution, including important Constitutional rights and breach contracts which lead to harm, loss and injury to many thousands of Irish people.

34. An Order / Declaration under articles 6, 34 to 38 and 40 to 44 of the Irish Constitution and article 6 of the ECHR on the precedents and case law presented to the High Court and to this appeal before the Supreme Court as listed and detailed in the following:

Book of Authorities for Void Proceedings, Void Judgments and Void Orders

Book of Authorities for Fraud

Book of Authorities for Fraudulent Seals

Book of Authorities for the Precautionary Principle

Book of Authorities for Informed Consent

Book of Authorities for the Precautionary Principle

Book of Causality

Book of Authorities for the Aarhus Convention

Book of Authorities for the Natural Law

Book of Causality where multiple correlations in Ireland and countries worldwide and in published scientific papers and pathology and medical studies and use of the Bradford Hill criteria for Causality all points towards one Causality, which in this case is mass covid19 vaccinations.

35. In his judgments, Twomey J. made reference to biological weapons in a condescending manner yet Twomey J. is not an expert in biological weapons. The world's leading authority on biological weapons is Dr. Francis Boyle in the USA, who is a Harvard University trained Professor and the architect of the 1989 Biological Weapons Anti-Terrorism Act, which was unanimously approved by both Houses of the U.S. He has advised governments around the world on biological weapons and is considered an expert in the field. Dr. Francis Boyle is involved in a legal case in the USA where he has stated in a sworn affidavit that the scientific and medical evidence shows the covid19 vaccines to be a biological weapon and violates several statutes, including the U.S. Code on Biological Weapons and Florida's statutes on weapons and firearms. I refer the Supreme Court to **Exhibit Boyle Affidavit**.

The details of this court case are

Joseph Sansone VS Ron de Santis and others

Case No.: SC24

and was filed in the Supreme Court of Florida on March 3rd 2024. A Writ of Mandamus was filed with the Supreme Court of Florida. This Mandamus seeks to compel Governor Ron DeSantis and Attorney General Ashley Moody to prohibit the distribution of 'COVID 19 injections' AKA 'COVID-19 nanoparticle injections' or 'mRNA nanoparticle injections' in the State of Florida. It was transferred out and is now in the Florida Appeals Court. The Appellate Brief was filed on Memorial Day, May 27th, 2024.

I refer the Irish Supreme Court to **Exhibit Florida Supreme Court.**

We intend to have Dr. Francis Boyle as a sworn expert witness in the Irish Supreme Court.

36. Due to the seriousness of the breaches of the Constitution and laws and rights, we invoke several jurisdictions for this court case and that they run concurrently and include the following :

- we invoke the Constitutional jurisdiction under articles 6, and 40 to 44 of the Irish Constitution and both fundamental rights and unenumerated rights, in particular article 41 relating to 'inalienable and imprescriptible rights, antecedent and superior to all positive law'
- we invoke the human rights jurisdiction, including our Irish and EU and international human rights both as Plaintiffs and on behalf of the Irish people as defined in article 6 of the Irish Constitution who are directly and indirectly impacted by this court case
- we invoke the Natural Law jurisdiction and it's rights as defined in the Natural Law and used over many centuries, and referenced and cited in the Irish Constitution and in superior court precedents, some cited in our Book of Authorities
- we invoke the Law of Equity jurisdiction as developed, used and applied for over two thousand years since Roman law times
- we invoke the Common Law jurisdiction as developed, used and applied for over nine hundred years since the creation of categories of writs and remedies at common law in the 10th century and Magna Carta (1215) and the Great Charter of Ireland (1216)
- we invoke the Brehon law which was the original law of Ireland and the Irish people since 500 BC and has existed for over two thousand years contains elements of Equity Law, Common Law, Criminal Law, the Natural Law and the Divine Law.
- we invoke jurisdiction of God as stated in the Irish Constitution and recognised in the swearing on bibles or other holy books pertaining to God in all courts in Ireland. Also, Judges of the Irish courts swear their oaths before God. And that all living men, women and children and indeed all judges, are accountable to God and come before God in judgment.

And we invoke all of these jurisdictions to run in parallel and concurrently in this case in the Supreme Court due to the nature of this case where harm, loss, injury and in some cases death has been caused to many thousands of living men, women and children from these covid19 vaccinations and the evidence shows that full informed consent was NOT given for them and the Precautionary Principle was NOT applied.

37. An Order / Declaration under the Preamble of the Constitution, articles 6, 34.6, 31, 34 to 38, 12, 41, and 40 to 44 of the Irish Constitution on the relevance and application and use of the Divine Law of God and of God as stated and recognized in the Preamble of the Irish Constitution and throughout the Irish Constitution which puts the Judiciary, the Legislative and the Executive and all living men, women and children under God and accountable to God, and all Judges under oath to God and in obedience to God in this case before the Supreme Court and as it applied before the High Court.

Article 6 of the Irish Constitution puts the Judiciary, the Legislative and the Executive and the people of Ireland under God, accountable to God, and in obedience to God, and in the Judge's oath to God at Article 34.6 of the Irish Constitution, all Judge are in obedience to God and ask God to sustain him or her. The Irish President's oath to God at Article 12 of the Irish Constitution puts the President in obedience to God and asks God to sustain him or her, and the Council of State's oath to God at Article 31 of the Irish Constitution puts it's members in obedience to God. The stated primacy of God over all living men, women and children and over all legal persons and legal fictions is in the aforementioned articles of the Irish Constitution above, and also in Article 44 of the Irish Constitution. The Irish Constitution does not put judges, and the Judiciary, the Legislative, the Executive, the President and the people of Ireland under a government minister(s) or politicians or their lobbyists and does not require an oath of obedience to them. The judgments and orders of Twomey J. have attempted to change this and put all of these parties under a government minister(s) or politicians or their lobbyists and imply an oath of obedience to them and no accountability. The primacy of God and Divine Law and full accountability to the named parties in the Irish Constitution has been ignored and rejected by Twomey J. in his judgments and orders and this makes them null and void ab initio.

The rights referenced at article 41 relating to 'inalienable and imprescriptible rights, antecedent and superior to all positive law' are implied to come from God as they existed prior to the Irish Constitution of 1937 and cannot be taken away, and are immutable and cannot be changed. These rights do not come from a politician or judge or a named man or woman.

It is a well known fact that the Irish Proclamation of Independence in 1916, and the Irish Declaration of Independence in 1919, and the Irish Constitution of 1937, all of which declared an independent republic

borrowed much from the US Declaration of Independence which declared an American Republic in 1776, and all four documents cited God and were placed under God and reliant on God and the people were similarly placed under God and reliant on God in these aforesaid documents.

I cite from the US Declaration of Independence :

'We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness'

and

'Nature's God'

These 4 documents have stated that rights and indeed life itself and bodily integrity and freedom proceeds from God, and is bestowed by God, and that all people are equal before God, according to the US Declaration of Independence and this is conceded and accepted in the Irish Constitution. The facts and evidence show that all living men, women and children will die and transition and come before God in judgment, thus the jurisdiction of God is absolute and total, omnipotent, omniscient, and omnipresent, pervasive and all encompassing, and both transcendent and immanent. It applies as much now in the present as it did when the Irish Constitution was written in 1937 and before it in 1922 and 1919 when the other Irish Constitutions were promulgated and will apply for many centuries into the future. The Irish Constitution concedes this fact, and the Constitution implies that all people die naturally and come before God in judgment and are subjected to the Divine Law of God.

The old dictum established over any centuries and millennia through wars, conflicts, revolutions, court cases, changes of governments, that Order proceeds from God and Disorder and Chaos proceeds from denying this Order and relying on the corruptions of mankind is highly relevant in this court case and in our modern times. The Irish Constitution in its wording emphasises this Order which proceeds from God and alignment and compliance with it and this is the object of our legal proceedings and court case.

The use of the Bible or other Holy Book in all Irish courts signifies the primacy of God and Divine Law over everybody and over all judges and all courts ; they do NOT swear on a judges' book or Court book or Law Society book or Bar Council book or TD's book or Minister's book. The Divine Law of God and God exists and has ultimate jurisdiction over everybody as stated in the Irish Constitution and this is recognised in the swearing on bibles or other holy books pertaining to God in all courts in Ireland. And this swearing on the Bible or Holy Book exemplifies the fact that all living men, women and children and indeed all judges, are accountable to the Divine Law of God, and come before God in judgment. This Divine judgment is mentioned many times in the Bible which is sworn upon in every

court in Ireland and the Book of Revelation provides the format of Divine law and Divine judgment.

And this same God and Divine Law of God gives the living men, women and children in Ireland and other nations the right to be fully informed about matters which involve life and death and threats to bodily integrity, provide their full informed consent, the right to bodily integrity, the right to government accountability in matters which affect their personal lives including actions by the government which cause harm, injury or loss, the right to earn a living, and the right to life. And the learned and honourable judges of the Supreme Court and other Irish courts are much a beneficiary of this as the litigants in this court case and all living men, women and children in Ireland.

I refer specifically to the breaches of bodily integrity and the right to life of many thousands of Irish people and to other breaches of fundamental rights and unenumerated rights detailed in this court case. It should be carefully noted in this Supreme Court case and by all Judges in the Irish courts that the Divine Law as understood in all religions and spiritualities worldwide for many thousands of years expressly forbids the following:

- (i) the injuring of people and this includes the use of experimental and rushed vaccines to do so
- (ii) the breach of bodily integrity, which includes causing illness, disability and suffering to people, and this includes the use of experimental and rushed vaccines to do so
- (iii) the breach of the right to life and this includes the use of experimental and rushed vaccines to do so
- (iv) the advertent and inadvertent poisoning of people for profit or other motives. This includes the use of experimental and rushed vaccines to do so.
- (v) manslaughter and this includes the use of experimental and rushed vaccines to do so
- (vi) the tort of assault and battery and this includes the use of experimental and rushed vaccines to do so
- (vii) lying about and the non disclosure of the injuries, illnesses, disabilities and deaths caused by a vaccine and denying people full informed consent for the vaccine. Thus endangering their lives and the lives of their children.
- (viii) causing loss to many thousands of Irish people damaged and harmed by the vaccine and to their families and livelihoods. And no compensation program in place for them by a government which falsely promised them the vaccines were “safe and effective”.
- (ix) thieving from taxpayers through contracts based on fraudulent misrepresentation, fraud and breach of contract which led to loss, harm and injury to thousands of taxpayers and the general public
- (x) using vaccine passports and apartheid to steal from the people of Ireland and cause loss, harm and injury to people, and deprive them of a living and of a normal family life and a normal social life
- (xi) political corruption and dishonesty, lying to the people and misleading the people causing loss, harm and injury to the people of Ireland.

All of these or immoral acts or unethical acts or transgressions or crimes or injustices were and are prohibited by the Divine Law of God and God in all religions and all spiritualities today and for thousands of years, the same God referenced in the Irish Constitution and thus having legal standing in all Irish courts. These transgressions or immoral acts or unethical acts or crimes were also breaches of articles 40 to 44 of the Irish Constitution which are God given rights and inalienable and imprescriptable. All of this has been detailed in our affidavits, exhibits and evidence given to the courts in our court case.

The breach of these rights constitute a breach of Divine Law of God or God as expressed in the Irish Constitution, and thus is a breach of the Irish Constitution itself. And a breach of the oaths to God taken by judges and oaths on the bible or holy book taken by litigants and members of the legal profession.

38. An Order / Declaration of Mandamus and of Rectitude under articles 40 to 44 of the Irish Constitution and the European Convention on Human Rights and EU Charter of Fundamental Rights requiring the government and Pfizer and the covid19 vaccine companies to jointly compensate the people who suffered illnesses, disabilities or deaths from the covid19 vaccinations and associated frauds. And that such compensation also includes innovative medical and alternative treatments to remove this poison from their bodies. We invoke and cite the ancient legal principle and right of “restituto in integrum”.

39. An Order / Declaration under articles 6, 34 to 38 and 40 to 44 of the Irish Constitution on the court precedent to be finally set in this court case both in its High Court form and Supreme Court form and officially recorded. And how this precedent will affect all people including Judges and/or their families and relatives and legal professionals and officers of the court who were injured, made ill, disabled or killed by the covid19 vaccines and how it will affect their Constitutional rights, Natural Law rights, Civil Rights, Statutory Rights, and Human Rights under Irish and international laws now in the present and in the future. And how this precedent will affect the provisions of the Irish Constitution and national international human rights law and future court cases based on these Constitutional rights and human rights.

Our case comes within the legal definition of Res Integra as it has not yet been decided or is a situation that has never been encountered before. Another legal term for this is Res Nova, which means "new thing" which has not been encountered by the courts yet.

40. An Order of Mandamus under articles 6, 15, 28, 37, 34 to 38 and 40 to 44 of the Irish Constitution requiring full accountability to the people of Ireland, ordering the Executive and Legislative to set up a fully independent, impartial, and fair International Inquiry in Ireland, independent of the state, using

international law and procedures, along the lines of the ICC, and using foreign adjudicators which will investigate and adjudicate on the

- (i) the origins of sars-cov2. Use of whistleblowers and whistleblower evidence in this
- (ii) the handling of the covid19 pandemic in Ireland
- (iii) the availability of medical drugs to treat and cure covid19 from May 2020 onwards and why these medical drugs were censored, condemned, and blocked by the government and medical authorities
- (iv) the deaths in the nursing homes in the period 2020 to 2022 and the role of Midazolam and other medications in this
- (v) the covid19 vaccines and vaccinations and all matters pertaining to them, including the injuries, illnesses, disabilities and deaths caused by the covid19 vaccines, and the emergency authorisation for the vaccines, and the vaccine passports and mandates
- (vi) the large and sudden rise in excess mortality which began after mass covid19 vaccinations in Spring 2020 and continued up to the end of 2023
- (vii) the censorship of medical doctors and scientists and of the press and media and social media in the period from March 2020 to the present. The methods used to censor, threaten and shut down medical doctors, scientists and journalists and social media companies and customers. This is already the subject of Supreme Court proceedings in the USA in *Murthy V Missouri*, 2024.

41. An Order / Declaration of Rectitude under article 40.3.2 of the Irish Constitution stating that we the Plaintiffs acted in good faith and wished to bring a conditional Injunction based on prima facie and irrefutable evidence showing lack of Informed Consent and lack of application of the Precautionary Principle under EU law and Irish law and had good grounds to do so in light of the 21,000 injuries, illnesses, disabilities and deaths in Ireland caused by the covid19 vaccines by 2023 according to the HPRA, and millions of injuries, illnesses, disabilities and deaths worldwide according to official government sources, and that we are not so called “conspiracy theorists” and other insulting, defamatory and pejorative names as falsely alleged by Judge Michael Twomey in his orders and judgments.

I cite from article 40.3.2 of the Irish Constitution below:

2° 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.

42. An Order / Declaration of Rectitude under article 40.3.2 of the Irish Constitution requiring the pillars of the Irish press and media such as RTE, the Irish Times, the Irish Independent and the Irish Examiner and all regional newspapers and radio stations to inform the general public about the facts and evidence of this court case including Exhibits 1, 2, 13, 15 and other Exhibits showing that full and informed consent was not given for these vaccines and that fraudulent misrepresentation, fraud and breach of

contract were involved in these vaccines and vaccinations., and that over 21,000 people in Ireland have been injured, made ill, disabled or killed by these vaccines. And that official government and EU statistics show the massive rise in excess mortality in Ireland took place after mass covid19 vaccinations in Spring 2021, and continued up to 2024. And an order of the court to vindicate the good name and reputation of the Plaintiffs in this court case in the press and media.

I cite from article 40.3.2 of the Irish Constitution below:

2° 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.

43. An Order / Declaration of Rectitude under article 40.3.2 of the Irish Constitution of compensation to the Plaintiffs for the vicious attacks against them resulting from the defective and erroneous judgments of Twomey J. and the slanderous and defamatory reporting of this in the press and media which incited hatred and violence against the Plaintiffs and led to breaches of the peace and breaches of the law. And to further breaches of the Constitutional rights and human rights of the Plaintiffs.

I cite from article 40.3.2 of the Irish Constitution below:

2° 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.

44. Duties of the Supreme Court to enforce Accountability under article 6 of the Irish Constitution. The purpose of the Separation of Powers in the Irish Constitution being to use the Constitutional checks and balances to power to ensure that there is no Executive over-reach, no Legislative over-reach, no Judicial over-reach, no State over-reach, and no Presidential over-reach which could breach article 6 of the Irish Constitution and other articles of the Irish Constitution and/or breach EU law, Irish law, and international human rights law.

This is elucidated in Point 28 of our grounding affidavit.

45. The Listing of 29 Grounds for Appeal to the Supreme Court and an SC-17 rescinding of the Judgment of the Supreme Court is in our Grounding Affidavit.

I pray this honorable Court for the reliefs sought in terms of the Notice of Motion and the Grounding Affidavit , the nature of the case and the reasons to be offered.

Signed :

(David Egan , Intending Applicant)

Date :

To ; Chief Registrar of the Supreme Court

Central Office

Four Courts

Dublin 7