

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES OF AMERICA)
ex rel. BROOK JACKSON,)
)
Relator,)
)
v.)
)
VENTAVIA RESEARCH)
GROUP, LLC.; PFIZER, INC.; ICON,)
PLC.,)
)
Respondents.)

CASE NO.: 1:21-CV-00008-MJT

**DECLARATION OF WARNER
MENDENHALL UNDER
28 U.S. CODE § 1746**

I, Warner Mendenhall, declare and state the following:

1. I am one of Brook Jackson's attorneys in this matter and make this statement in support of her opposition to the Department of Justice's Motion to Intervene and Motion to Dismiss.
2. This declaration is based on my personal knowledge. If called as a witness, I could testify competently to the facts set forth herein.
3. Brook Jackson, with counsel, met with the Department of Justice (DOJ) on November 16, 2023.
4. We informed the DOJ of additional witnesses, deaths, and injuries at other trial sites unreported by Pfizer.
5. At that meeting, the DOJ never advised Ms. Jackson of any perceived deficiencies or burdens on the United States caused by her actions.
6. We clarified that we would proceed with the litigation and bear the burdens of discovery.

7. We discussed the remarkable worldwide private sector science and crowd sourced document review and data analysis bolstering this case and exposing DNA contamination, vaccine ingredients, genetic effects, and other adverse events.
8. Before the filing of the United States Motion to Intervene, we had a L.R. 7 phone call with the DOJ on March 13th, 2024.
9. We tried to determine, unsuccessfully, the basis for the Motion to Intervene. There was no coherent explanation about why exposing fraud in the clinical trials would be contrary to United States public health policy.
10. Attached hereto are true and accurate copies of the following exhibits filed in opposition to the DOJ motion.
 - a. Exh. A- Mead, et al. “COVID-19 mRNA Vaccines: Lessons Learned from the Registrational Trials and Global Vaccination Campaign” *Cureus* (Jan. 24, 2024).
 - b. Exh. B- Seneff et al., “Innate immune suppression by SARS-CoV-2 mRNA vaccinations” *Food Chem. Toxicol.* (June 2022).
 - c. Exh. C- Neil et al., “The extent and impact of vaccine status miscategorisation on covid-19 vaccine efficacy studies.” <https://doi.org/10.1101/2024.03.09.24304015>.
 - d. Exh. D- Faksova et al. “COVID-19 vaccines and adverse events of special interest: A multinational Global Vaccine Data Network (GVDN) cohort study of 99 million vaccinated individuals” *Vaccine*.
 - e. Exh. E- Letter of Rolf Hazlehurst.
 - f. Exh. F-, (oral argument in FDA v. Alliance for Hippocratic Medicine et al., No. 23-235).

- g. Exh. G- 1/6/22 Order in Public Health and Medical Professionals for Transparency, v FDA, No. 4:21-cv-1058-P.
- h. Exh. H- 1/5/24 Order in Freedom Coalition of Doctors for Choice v. Centers for Disease Control and Prevention, et al., No. 2:23-cv-102-Z.)
- i. Exh. I- Fraiman et al., “Serious adverse events of special interest following mRNA COVID-19 vaccination in randomized trials in adults between vaccinated and placebo groups,” *Vaccine*.
- j. Ex. J -, Polack et al., “Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine” *NEJM* (December 2020).
- k. Exh. K – Granston, “Factors for Evaluating Dismissal Pursuant to 31 U.S.C. 3730(c)(2)(A)” (January 10, 2018) (the “Granston Memo”).
- l. Exh. L- Boyd, Letter to Senator Grassley, Dec. 19, 2019.
- m. Exh. M - Letter from Senator Grassley to Attorney General Barr, (May 4, 2020).

I declare under penalty of perjury according to the laws of the United States that the foregoing is true and correct. Executed on April 19, 2024.

/s/Warner Mendenhall
Warner Mendenhall