

**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 JOSEPH  
FRAIMAN, MD UNDER  
28 U.S. CODE § 1746**

I, Joseph Fraiman, MD, declare and state the following:

1. I am an emergency medicine physician in New Orleans, Louisiana, affiliated with multiple hospitals in the area. I obtained my medical degree from Cornell Medical School and have been practicing since 2012. I served as Director of Louisiana Search and Rescue Task Force One, and am board certified in Emergency Medicine. I have long been interested in and engaged in medical scientific research. Since 2020, I have been actively participated in scientific inquiries into COVID-19, and since the Emergency Use Authorization, into health consequences of Pfizer's mRNA vaccines.
2. I make this declaration opposing the Department of Justice's Motion to Intervene and Dismiss Brook Jackson's lawsuit under the False Claims Act against Pfizer in connection with the clinical trials conducted on its vaccine. The statements made in this declaration are based on my personal knowledge, education, facts or data, and experience, and under the penalty of perjury of the laws of the United States of America.

3. The facts stated in this declaration are true and correct, based on my personal knowledge, and the opinions expressed herein are my true opinions based on my years of experience and exercise of medical and scientific judgment. I am competent to testify on the matters stated herein. The facts and matters set forth herein are the type of facts and matters that medical experts rely upon to reach expert conclusions. If called as a witness herein, I could and would testify competently and to a reasonable degree of scientific and medical certainty regarding the matters stated herein.
4. I am one of the co-authors of the article entitled “Serious adverse events of special interest following mRNA COVID-19 vaccination in randomized trials in adults,” which was published in the medical journal *Vaccine* on September 22, 2022 (online on August 31, 2022 [doi: 10.1016/j.vaccine.2022.08.036].” Statements made in the article are true and correct based on my own personal knowledge and/or the personal knowledge of my co-authors, and our professional review of source information cited therein. The opinions and recommendations expressed in the article are mine, or, as appropriate, my co-authors. If called as a witness, I would and could testify competently to the matters stated therein to a reasonable degree of scientific and medical certainty.
5. As explained and documented more specifically in the article, we used lists of adverse events identified by the Brighton Collaboration, to evaluate serious adverse events observed in Pfizer’s placebo-controlled, phase III randomized mRNA COVID-19 vaccine trial. Pfizer mRNA COVID-19 vaccine was associated with an excess risk of serious adverse events of special interest of 10.1 per 10,000 vaccinated over placebo baselines of 17.6 (95 % CI: 0.4 to 20.6). The Pfizer trial exhibited a 36% higher risk of serious adverse events in the vaccine group; risk difference 18.0 per 10,000 vaccinated (95 % CI 1.2 to 34.9); risk ratio 1.36 (95 %

CI 1.02 to 1.83). The excess risk of serious adverse events found in our study points to the need for formal harm-benefit analyses, particularly those that are stratified according to risk of serious COVID-19 outcomes. These analyses will require public release of participant level datasets.

6. I am not affiliated with the defendants, plaintiffs, or lawyers involved in this or any other litigation on this matter and have not received nor sought any compensation, either directly or in-kind, for this affidavit. I am submitting this affidavit because the matter relates to my area of study and concerns me.

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.

*Joseph Fraiman, MD*

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Joseph Fraiman, MD