

1 **Report Concerning Dr. Charles Hoffe and the Citation Issued July 19, 2023**

2
3 January 10, 2024
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5 President, CMO Front Line Covid-19 Critical Care Alliance
6 168 Surfside Avenue
7 St. Augustine, FL 32084

8
9 **Background**

10
11 I am Board Certified in Internal Medicine, Pulmonary Diseases, and Critical Care Medicine and
12 am a former Associate Professor, Chief of the Critical Care Service, and Medical Director of the
13 Trauma and Life Support Center at the University of Wisconsin. To date, I have published over
14 50 peer-reviewed papers, 17 book chapters, and served as senior editor of an award-winning
15 textbook now published in its 2nd edition and translated into 7 languages. I have never had any
16 malpractice claims or patient complaints.

17
18 I am also the founder and Medical Director of a private telehealth practice opened in February of
19 2022 called the Leading Edge Clinic (drpierrekory.com), which is solely focused on treating
20 patients with COVID and its complications including “long haul” and post-COVID-mRNA
21 vaccine injury syndromes.

22
23 I have led ICU’s in multiple COVID-19 hotspots throughout the pandemic, the first being Mount
24 Sinai Beth Israel ICU in New York City during their initial surge in May 2020 for 5 straight
25 weeks, I then travelled to other COVID-19 hotspots to run COVID ICU’s in Greenville, South
26 Carolina and Milwaukee, WI during their surges. I have co-authored over ten influential papers
27 on COVID-19 with the most impactful being a paper that was the first to support the diagnosis of
28 early COVID-19 respiratory disease as an organizing pneumonia, thus explaining the critical
29 response of the disease to corticosteroids. I have also published over 15 Op-Ed’s in major news
30 outlets in the U.S and I write for a medical Blog called Medical Musings where I have almost
31 80,000 subscribers.

32
33 I also am the Co-Founder, President, and Chief Medical Officer of the Front Line COVID-19
34 Critical Care Alliance, a non-profit organization of critical care specialists led by Professor Paul
35 Marik whose mission has been focused on the research and development of effective treatment
36 protocols for COVID-19 using repurposed drugs.

37
38 I am most known for my U.S Senate Testimony calling attention to the critical need for
39 corticosteroid use in hospitalized patients in May 2020 and then again in December of 2020 on
40 the efficacy of ivermectin in early outpatient prevention and treatment of Covid. Most recently,
41 based on my extensive research with the FLCCC, I became one of the most sought-after experts
42 on the use of ivermectin. My book, “The War on Ivermectin” has achieved best seller status at
43 times in multiple book categories on Amazon in the U.S, Canada, Australia, and the UK.

44
45 My CV attached as Appendix A.
46

47 A brief summary of accomplishments from my CV:
48 I have a BA in Mathematics from University of Colorado, Boulder in 1994
49 I have a MA in Public Health Administration from New York University, 1996
50 I have an MD from St. George's University, Grenada 2002
51
52 From 2008-2015 I was a Teaching Attending at Beth Israel Medical Center in New York City.
53 From 2012-2015, I served as the Program Director of the Pulmonary and Critical Care Fellowship
54 at Beth Israsel Medical Center.
55 From 2015-2020 I was the Chief of the Critical Care Service at the University of Wisconsin where
56 I also served as the Medical Director of the Trauma and Life Support Center.
57 Since 2020, I have been the President and Chief Medical Officer of the Front Line Covid-19
58 Critical Care Alliance
59 Since 2022, I have been the Chief Medical Officer of The Leading Edge Clinic
60
61 I was considered one of the world pioneers in the use of ultrasound by physicians in the
62 diagnosis and treatment of critically ill patients. I helped develop and run the first national
63 courses in Critical Care Ultrasonography in the U.S. and served as a Director of these courses
64 with the American College of Chest Physicians for several years. I am also the senior editor of
65 the most popular textbook in the field titled "Point of Care Ultrasound," a book that is now in its
66 2nd edition and that has been translated into 7 languages worldwide. I led over 100 courses
67 nationally and internationally teaching physicians this now-standard skill in his specialty.
68
69 I was also one of the pioneers in the United States in the research, development, and teaching of
70 performing therapeutic hypothermia to treat post-cardiac arrest patients. In 2005, my hospital
71 was the first in New York City to begin regularly treating patients with therapeutic hypothermia.
72 I then served as an expert panel member for New York City's Project Hypothermia, a
73 collaborative project between the Fire Department of New York and Emergency Medical
74 Services that created cooling protocols within a network of 44 regional hospitals along with a
75 triage and transport system that directed patients to centers of excellence in hypothermia
76 treatment, of which my hospital was one of the first.
77
78 I am known as a Master Educator and have won numerous departmental and divisional teaching
79 awards in every hospital I have worked and I have delivered hundreds of courses and invited
80 lectures throughout my career.
81
82 In collaboration with Professor Paul Marik, I also helped pioneered the research and treatment of
83 septic shock patients with high doses of intravenous ascorbic acid. My work was the first to
84 identify the critical relationship between the time of initiation of IV Vitamin C therapy and
85 survival in septic shock patients, an aspect of the therapy that led to understanding all the failed
86 randomized controlled trials that employed delayed therapy.
87
88 **EXPERT OPINION**
89 I acknowledge correspondence from you dated November 3, 2023, asking me to formulate an
90 independent professional opinion concerning the safety and effectiveness of ivermectin as a
91 treatment and prophylaxis for SARS-CoV-2 (Covid-19), as well as the science regarding Covid
92 19 vaccine "shedding".

93
94 You have asked me to comment on the opinion expressed by the “expert”, Dr. Trevor Corneil,
95 relied upon by the College concerning these issues in his report dated September 26, 2022,
96 specifically in sections 6.4, 6.5 and 6.10 of his report.

97
98 I am aware of my duty to assist the panel and I am not an advocate for any party. I have prepared
99 this report with this in mind and am happy to testify in any setting to address questions regarding
100 the matter.

101
102 I attach as Appendix B, a copy of your letter of instruction, including the list of documents which
103 I have reviewed in forming my opinion.

104
105 Further, you asked me to refer to paragraphs 3a and 3c of the Citation and paragraph d, and e. of
106 the Particulars and the Joint Message so I could be informed about what the College and our
107 government officials have had to say about these issues.

108
109
110 **Response To Section 6.4 of Dr. Trevor Corneil Expert Opinion**

111
112 My first comment on Dr. Corneil’s report is that he carefully defines the following terms:
113 “misleading”, “incorrect”, “inflammatory” and then judges Dr. Hoffe’s statement in relation to
114 meeting the definitions of each term above. He then follows each statement’s characterization
115 according to these terms with his opinion as to whether Dr. Hoffe’s statements meet the College’s
116 “Prudence and Harm Prevention” standards.

117
118 Similarly, for the below expert report, understanding the arguments I put forth requires knowledge
119 of the word “disinformation.” The Oxford English dictionary definition is “*a form of propaganda*
120 *involving the dissemination of false information with the deliberate intent to deceive or mislead.*”

121
122 Understanding my below expert opinion and how I arrived at it also requires the knowledge that
123 disinformation has been long deployed by select corporations across a range of industries. In the
124 article called “[The Disinformation Playbook](#)” written by the Union of Concerned Scientists, they
125 write, “corporations manipulate science and scientists to distort the truth about their products,
126 using a set of tactics made famous decades ago by the tobacco industry. We call these tactics the
127 Disinformation Playbook.”

128
129 An important point to understand about disinformation tactics is that corporations deploy them
130 when “science emerges that is inconvenient to their interests.” The Disinformation Playbook was
131 first developed in the 1950’s by the Tobacco Industry to scientifically counter the emerging reports
132 of greatly increased incidences of cancers in smokers. They successfully used disinformation for
133 50 years until the Master Settlement in 1995 with the US Attorney Generals of 50 states.

134
135 As one of the world experts in the use of ivermectin in the prevention and treatment of Covid-19,
136 my first review paper called “Review of the Emerging Evidence Demonstrating Efficacy of
137 Ivermectin in the Prevention and Treatment of Covid-19” is one of the most popular published

138 scientific papers of the last 15 years with an [altmetric score](#) ranking it the 10th most popular paper
139 out of the last 25 million papers published.

140 Based on my intensive study of the ivermectin evidence base, including in-vitro, in-vivo, clinical
141 and epidemiological studies, the evidence for efficacy is overwhelming, with, as of today, January
142 10, 2023, results available from 100 controlled clinical trials, 47 of them randomized, with meta-
143 analysis data finding statistically significant, large magnitude reductions in mortality,
144 hospitalization, time to clinical recovery, and time to viral clearance.

145
146 However, Dr. Corneil, along with numerous public health agencies and professional societies
147 across the world's advanced health economies consistently ignore or systematically dismiss and
148 distort the evidence of efficacy based on the widespread "opinion" that the evidence base
149 represents "low-quality" evidence that should not be relied on. This is a well-known
150 Disinformation tactic called "the Diversion" where the pharmaceutical industry co-opts 3rd party
151 agencies and organizations to "manufacture uncertainty where little or none exists."

152
153 The reasons for the Disinformation campaign against ivermectin are multiple. First is that
154 knowledge of ivermectin's efficacy in both prevention and treatment would have led to the
155 revocation of the EUA supporting the massive mRNA vaccine market and the global vaccination
156 campaign and would also increase what [public health authorities perceived](#) as the #1 enemy in the
157 pandemic, that of "vaccine hesitancy." A third reason is that knowledge of ivermectin's efficacy
158 would greatly decrease profits from the competing, patented, highly profitable Covid medicines
159 such as remdesivir, paxlovid, and molnupiravir.

160
161 From the article, "The Disinformation Playbook" they name and define five Disinformation
162 tactics. The most prominent disinformation tactics deployed against ivermectin have been
163 extensively documented in my book called "The War on Ivermectin." The tactics described from
164 their 2017 article are as follows:

- 165 1) using fraudulent studies designed to achieve pre-determined results.
- 166 2) censoring the publication of positive studies in prominent medical journals
- 167 3) selectively publishing only negative studies in prominent medical journals
- 168 4) harassing scientists who speak out with results or views inconvenient for competitors of
169 ivermectin.
- 170 5) using front groups and 3rd party organizations to "manufacture uncertainty where little or
171 none exists."
- 172 6) Buying credibility through alliances with academia or professional societies
- 173 7) Manipulating government officials or processes to inappropriately influence policy.

174
175 For the purposes of this report, I will focus mostly on the first three tactics above which has led to
176 widespread false beliefs regarding ivermectin.

177
178 **Statement (d).** Dr. Hoffe stated in an interview with Laura-Lynn Tyler Thompson, video of
179 which was posted online on or around July 6, 2021, at 20:45 – 21:23:

180
181 *"...There are brilliant, very, very safe, very effective treatments for Covid, and for the medical*
182 *authorities to tell them that they have to go home and do nothing is utter negligence. ... And*
183 *for people to say that it is safer to do nothing than to take something like ivermectin, which*

184 *is unbelievably safe – I mean, in many countries, it’s available without prescription, I mean it’s*
185 *safer than aspirin, it really is safer than aspirin, um, so it is absolutely absurd [inaudible] that*
186 *this is being denied from people”.*
187

188 In Dr. Corneil’s assessment of the accuracy of Dr. Hoffe’s statement, he concludes the following
189 in regard to the use of ivermectin to prevent or treat Covid-19:
190

191 1) Prior and current evidence strongly suggest that Ivermectin is neither a safe nor effective
192 treatment or prophylaxis for COVID-19 illness. A meta-analysis published in April 2021
193 urged caution as available trials investigating the use of ivermectin for prophylaxis
194 against COVID-19 exhibited a serious risk of bias and imprecision.¹⁴¹ A Cochrane
195 systematic review conducted in July 2021 noted that the reliable evidence available did
196 not support the use of ivermectin for treatment or prevention of COVID-19.¹⁴² Recently,
197 a double blind randomized clinical trial of over 1400 patients observed that administering
198 ivermectin did not prevent the occurrence of serious outcomes, hospitalizations or death
199 from COVID-19.¹⁴³ The World Health Organization issued a recommendation on March
200 31, 2021 against the use of ivermectin for patients with COVID-19, regardless of disease
201 severity, except in the context of a clinical trial.¹⁴⁴ On Oct. 19, 2021, Health Canada
202 issued a public advisory not to use ivermectin to prevent or treat COVID-19.¹⁴⁵
203

204 I will now explore the selective evidence that Dr. Corneil relied on to reach those conclusions.
205

206 **IVERMECTIN IN THE PREVENTION OF COVID-19**

- 207 a) Dr. Corneil writes, “A meta-analysis published in April 2021 urged caution as available
208 trials investigating the use of ivermectin for **prophylaxis against COVID-19** exhibited a
209 serious risk of bias and imprecision.”
210 b) To support this statement he cites a meta-analysis in the BMJ from April of 2021
211 ([Bartoszko et al](#)) which included only 2 randomized controlled trials of ivermectin in
212 prevention of Covid. He also cites a Cochrane review which included only one RCT that
213 Bartoszko included.
214

215 The first observation I will make is that Dr. Corneil relied on only two RCT’s only to form this
216 opinion when there are 4 that have been conducted. Second, he appears unaware of the evidence
217 showing that both the BMJ and Cochrane review of prophylaxis trials are examples of the
218 disinformation tactic called “the Fake,” i.e. “using fraudulent studies designed to achieve pre-
219 determined results.”
220

221 The most brazen evidence that these papers were attempts to reach a “pre-determined result” is
222 that the BMJ paper was published three months before the Cochrane review and included two
223 RCT’s while Cochrane only included one. There were two available at the time of the Cochrane
224 review, [Seet et al](#) and [Shouman et al](#). Why would they ignore one of the RCT’s?
225

226 Further evidence of fraud (bolded) can be seen in the abstract of the Cochrane review which
227 states:
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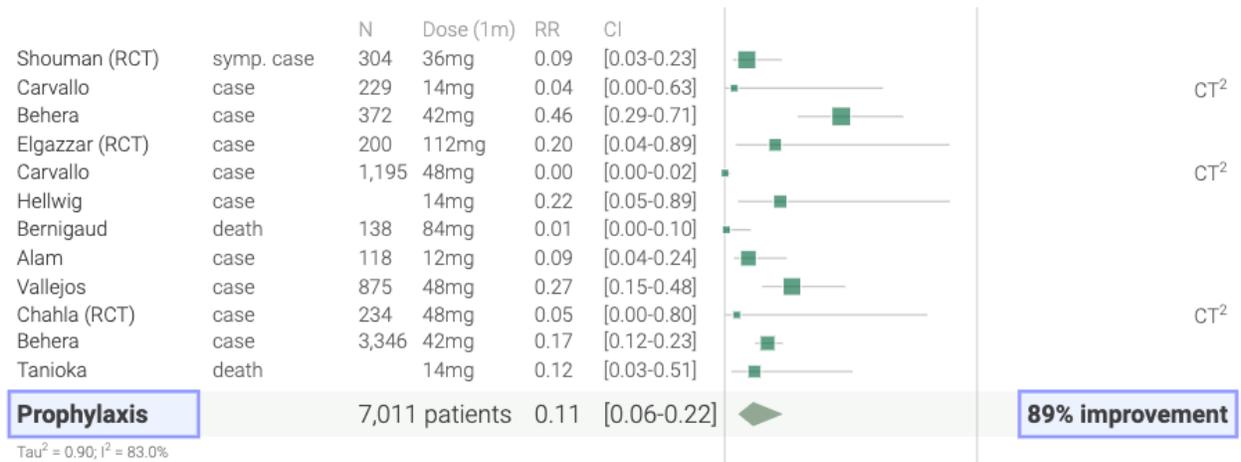
229 **We found one study. Mortality up to 28 days was the only outcome eligible for primary**
 230 **analysis. We are uncertain whether ivermectin reduces or increases mortality compared to no**
 231 **treatment (0 participants died; 1 study, 304 participants; very low-certainty evidence). The study**
 232 **reported results for development of COVID-19 symptoms and adverse events up to 14 days that**
 233 **were included in a secondary analysis due to high risk of bias. No study reported SARS-CoV-2**
 234 **infection, hospital admission, and quality of life up to 14 days.**

235 The first two sentences are provably false. First there was more than one RCT available which
 236 studied ivermectin in prevention.

237
 238 Second, in the one study they included, the primary outcome was the development of Covid-19
 239 symptoms, not mortality. Instead that paper reported that the incidence of Covid-19 symptoms
 240 was 7.4% in those prophylaxed with ivermectin and 58.4% with standard of care. This was a
 241 very large magnitude and highly statistically significant reduction in risk of developing Covid
 242 symptoms, yet Cochrane reported it as being negative for an incorrectly stated primary outcome
 243 of mortality. The large, statistically significant numerical reduction in risk of contracting Covid
 244 is not mentioned.

245

246 Similar evidence of fraudulently ignoring the evidence base for ivermectin as a prevention of
 247 Covid can be found in the [WHO Living Guideline for ivermectin](#), published March 31, 2021
 248 where they stated in Section 3.1, **“While ivermectin is also being investigated for prophylaxis,**
 249 **this guideline only addresses its role in the treatment of COVID-19”**. I believe the College
 250 should ask themselves why the WHO, in the midst of a global pandemic, would refuse to look at
 251 the evidence base for ivermectin as a preventative? Especially since the evidence base at that
 252 time (screenshot taken March 31, 2021 from the [internet archive](#) of ivmmeta.com):



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256 As you can see above, there were results from 3 RCT’s available, all finding large magnitude,
 257 statistically significant reductions in the risk of getting Covid. Further, there were 7 other
 258 observational controlled trials (I excluded the “ecological” trials). I must note that the Elgazzar
 259 trial above was later retracted (this was a disinformation tactic which I am happy to provide

260 evidence of separately if asked), however, other RCT's finding similar benefits subsequently
261 replaced his trial in the evidence base.

262 Why were observational controlled trials excluded from the BMJ, Cochrane, and WHO analyses?

263 I maintain that excluding OCT's is a form of disinformation in that OCT's can be done for little
264 to no funds by independent investigators free of pharmaceutical conflicts of interests. The known
265 and explicit bias of the massive funders of large RCT's are generally not present in OCT's. This
266 is why the pharmaceutical industry and it's high-impact medical journals have increasingly
267 avoided publishing OCT's in the last decade.

268 For support of my statement above that "Big Pharma" exerts immense influence of our most
269 respected medical journals, I will reference the book written in 2001 by the former 20-year
270 editor-in-chief of the New England Journal of Medicine (NEJM), Dr. Marcia Angell (she was
271 also the first woman to serve in this role). The book is called *Drug Companies & Doctors: A
272 Story of Corruption*.

273 A [well-cited statement](#) of Dr. Angell is

274 *"It is simply no longer possible to believe much of the clinical research that is published, or to
275 rely on the judgment of trusted physicians or authoritative medical guidelines. I take no pleasure
276 in this conclusion, which I reached slowly and reluctantly over my two decades as an editor."*

277 Dr. Relman, another former editor-in-chief of the NEJM said this in 2002:

278 *"The medical profession is being bought by the pharmaceutical industry, not only in terms of the
279 practice of medicine, but also in terms of teaching and research. The academic institutions of
280 this country are allowing themselves to be the paid agents of the pharmaceutical industry. I think
281 it's disgraceful."*

282 Richard Horton, editor in chief of the Lancet [said](#):

283 *"The case against science is straightforward: much of the scientific literature, perhaps half, may
284 simply be untrue. Afflicted by studies with small sample sizes, tiny effects, invalid exploratory
285 analyses, and **flagrant conflicts of interest**, together with an obsession for pursuing fashionable
286 trends of dubious importance, science has taken a turn towards darkness"*

287 More damning is that there is no evidence to support this growing practice of systematically
288 excluding OCT's from systematic reviews and meta-analyses. In fact, it is in violation of
289 evidence based medicine (EBM) given that it willfully ignores decades of research which have
290 found, on average, that [OCT's and RCT's reach the same conclusions](#).

291 From the [definitive Cochrane review](#) on this topic, the authors conclude that "Factors other than
292 study design *per se* need to be considered when exploring reasons for a lack of agreement between
293 results of RCTs and observational studies." Further, prominent professional societies have issued
294 [policy statements](#) to reverse this practice by concluding, from their analyses of controlled trial

295 designs, that “*observational studies should be considered in developing clinical practice*
296 *guidelines and in making clinical decisions.*” Lastly, until Covid, the WHO routinely relied on
297 more diverse sources of data and trial designs to inform their treatment recommendations.
298

299 Further, another astonishing violation of EBM is the repeated insistence that “low quality” trials
300 be ignored. The reality is that there is no published evidence that I am aware of that finds that “low
301 quality” controlled trials reach different conclusions than “high quality” controlled trials. In fact,
302 there is only [one paper](#) I know of which compared the conclusions of what current EBM grading
303 systems determine is low quality and high quality. In [that paper](#), they found that low-quality and
304 high-quality trials also reach the same conclusions on average.
305

306 Thus, it is my strongly held, evidence-based opinion that the systematic ignoring of both OCT’s
307 and “low quality trials” are instead fraudulent efforts to create the myth that only “Big RCT’s” that
308 require massive funding can determine “scientific truth” or “scientific consensus.”
309

310 In the below expert opinion, I will show provide extensive evidence that the bias of the funders
311 of those “big RCT’s” essentially determine the results of the RCT’s and those results are then
312 used to establish a fraudulent “scientific consensus.” This occurs when the “real science” I
313 described above reaches conclusions that are “inconvenient to the interests of the pharmaceutical
314 industry.” I suspect that many members of the Royal College of Physicians and Surgeons are
315 unaware of how rife disinformation is, or of the studies I just presented regarding the soundness
316 of non-RCT derived evidence.

317 In contrast to Dr. Corneil and the numerous professional society recommendations he cites,
318 many independent experts like me have, in line with this knowledge of the equivalence of OCT
319 findings and RCT findings and high quality and low quality trials, chosen to rely upon a “totality
320 of the evidence standard” and include data from OCT’s and supposed “lower quality” trials. This
321 practice is the most adherent to the foundational principles of Evidence Based Medicine (EBM).
322 Recall that in the 1980s, responding to the need to overturn entrenched dogmas with scientific
323 evidence, Gordon Guyatt coined the term “evidence-based medicine,” (EBM). Then in 1996,
324 David L Sackett, published [a widely cited article](#) defining exactly what EBM was: the
325 conscientious, explicit, and judicious use of current best evidence in making decisions about the
326 care of individual patients.

327 Notice how Sackett does not define current best evidence as “RCT’s only”:

328 “By best available external clinical evidence we mean clinically relevant research, often from the
329 basic sciences of medicine, but especially from **patient centered clinical research** into the
330 accuracy and precision of diagnostic tests (including the clinical examination), the power of
331 prognostic markers, and the efficacy and safety of therapeutic, rehabilitative, and preventive
332 regimens. External clinical evidence both invalidates previously accepted diagnostic tests and
333 treatments and replaces them with new ones that are more powerful, more accurate, more
334 efficacious, and safer.

335 Put differently, Sackett, proposed that three different considerations that needed to be weighted
336 equally in evidence based clinical practice:

- 337
338 •Patient Values
339 •Clinical Expertise
340 •Relevant Research

341
342 In terms of relevant research, the summary analyses of the prevention trials found a highly
343 statistically significant 88% reduction in your chance of getting Covid, far outperforming what
344 we know now of the efficacy of the Covid mRNA vaccines. Yet, the agencies and societies
345 across the world all ignored the OCT's and included only a subset of the RCT's, and in the case
346 of Cochrane, mis-stated its findings and their importance. The WHO ignored the evidence base
347 entirely in their ivermectin recommendation.

348
349 It is my professional opinion that these actions were willfully committed as a disinformation
350 tactic to “arrive at a pre-determined result”, which is to find that ivermectin is ineffective in
351 preventing Covid-19 for the reasons I stated above.

352
353 In support of Dr. Hoffe's statement, the College should be aware that the [evidence base](#) for
354 ivermectin in the prevention of Covid includes: 14 controlled trials including 18,799 subjects of
355 which: 4 are RCT's, 2 are propensity score matched trials (PSM – which rival RCT's in accuracy),
356 and 8 are OCT's. Each one of the 14 trials which studied ivermectin in prevention of Covid-19
357 found large benefits in reducing risk, and in 13 of the 14, the benefits were highly statistically
358 significant.

359 In the RCT's alone:

- 360 i. [Shouman et al](#): 91% reduction in the incidence of getting Covid, $p < .001$, 304
361 patients
362 ii. [Chahla et al](#): 95% reduction in the incidence of getting Covid, $p = .002$, 234 patients
363 iii. [Seet et al](#): 74% reduction in risk of getting Covid, $p = .008$, 1,236 patients
364 iv. [Desort-Henin et al](#): 72% reduction in the incidence of Covid, $p < .001$, 399 patients).

365 In the propensity score matched trials:

- 366 i. [Kerr et al](#): 44.5% reduction in the incidence of Covid, 67% reduction in risk of
367 hospitalization and 79% reduction in risk of death, p values all less than .001. Study
368 included 6,068 patients.
369 ii. [Morgenstern et al](#): 74% reduction in the incidence of Covid, 80% reduction in risk of
370 hospitalization

371 In the observational controlled trials:

- 372 iii. [Carvallo et al](#): 96.3% reduction in risk of Covid, $p < .001$, 229 patients
373 iv. [Behera et al](#): 54% reduction in risk of Covid, $p < .001$, 372 patients
374 v. [Carvallo et al](#): 100% reduction in risk of Covid, $P, .001$, 1,195 patients
375 vi. [Bernigaud et al](#): 99% reduction in risk of Covid, $p < .001$, 3,131 patients
376 vii. [Alam et al](#): 91% reduction in risk of Covid, $p < .001$, 118 patients
377 viii. [Behera et al](#): 83% reduction in risk of Covid, $p < .001$, 3,346 patients
378 ix. [Mondal et al](#): 87.9% reduction in risk of Covid, $p = .006$, 1,470 patients
379 x. [Samajdar et al](#): 79.8% reduction in risk of Covid, $p < .001$, 245 patients

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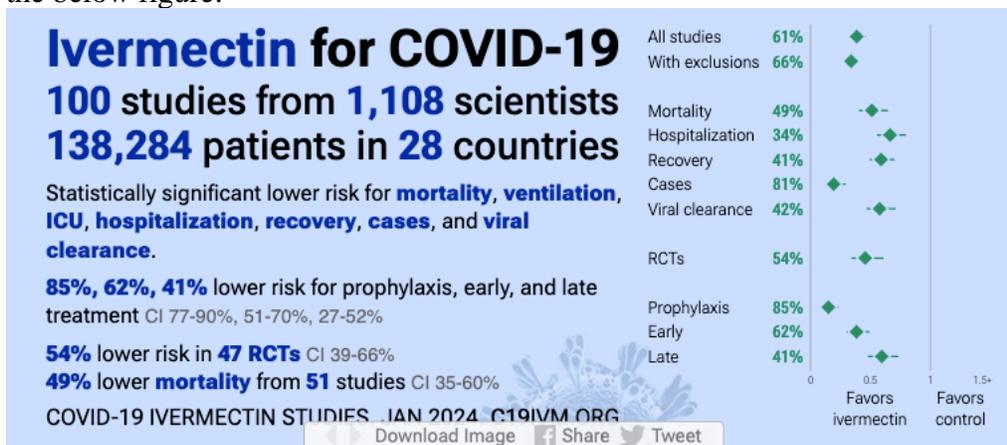
381 To summarize, as above, there are 4 RCT's, 2 PSM, and 8 OCT's. All but one, find that, like the
382 RCT's, large, statistically significant reductions in the incidence of Covid occurred among treated
383 patients. The largest trial by Kerr et al, of which I am a co-author, studied the results of a
384 prospective prophylaxis program conducted by the City of Itajai in Brazil which included 133,051
385 patients. Both the non-propensity matched, and propensity-matched analyses found statistically
386 significant, large reductions in the risk of not only getting Covid, but also in the risk of
387 hospitalization and death.

388
389 Thus, based on the totality of the highly consistent evidence base of 14 controlled trials all showing
390 statistically significant efficacy and safety, I disagree with Dr. Corneil's statement above that
391 "prior and current evidence strongly suggest that Ivermectin is neither a safe nor effective
392 prophylaxis for COVID-19 illness." I instead find that Dr. Hoffe's statement is entirely accurate
393 and not misleading, inaccurate, or in violation of the Prudence and Harm Reduction standards.

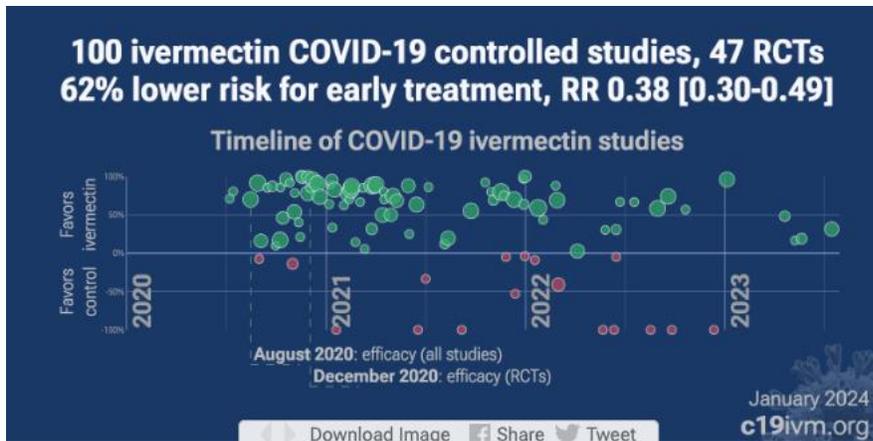
394 395 **IVERMECTIN IN THE TREATMENT OF COVID-19**

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397 The main rationale that agencies and "experts" like Dr. Corneil use to reject extensive evidence
398 in favor of the use of ivermectin in COVID-19 is to isolate a few negative studies and attempt to
399 highlight them without acknowledging the substantial body of trials contributing data for a
400 substantial meta-analysis. Of the 46 RCTs, Dr. Corneil simply cited one "negative" RCT
401 (Bramante et al) and one Cochrane systematic review from July of 2021 (approximately two and
402 a half years ago).

403
404 The overall tracking of the studies along with a real-time meta-analysis of not only ivermectin
405 but also dozens of other Covid therapies using the same inclusion and meta-analysis protocol,
406 can be found at c19early.com. The results [for ivermectin](#) as of today, January 10, 2023 are based
407 on 100 controlled trials. Note the Forest plots showing the meta-analysis findings to the right in
408 the below figure:



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Further, in this [analysis](#), Ivermectin was found to have been adopted in all or part of 22 countries (39 including non-government medical organizations).

Now, since Dr. Corneil cited only two studies to support his assertion that “Prior and current evidence strongly suggest that Ivermectin is neither a safe nor effective treatment or prophylaxis for COVID-19 illness,” I think it is important that we carefully review the innumerable deficiencies, anomalies, and limitations of the two papers he cited to support the above statement.

- 1) Bramante et al was a “remote” phase 3, double-blind, randomized, placebo-controlled trial which included 1,431 patients. There are numerous critical and severe issues with this trial as below (click on link for the evidence of these issues):

- | | |
|-----------------|---|
| CRITICAL | 1. Ivermectin vs. placebo analysis - 61% lower hospitalization. |
| CRITICAL | 2. Severity mismatch for ivermectin treatment but not for any other medication or control |
| CRITICAL | 3. ER results unreliable, not related to symptoms |
| CRITICAL | 4. Mismatch with reported death and symptoms |
| CRITICAL | 5. Ivermectin vs. placebo symptoms consistent with efficacy |
| CRITICAL | 6. Multiple outcomes missing, including time to recovery |
| CRITICAL | 7. Hypoxemia results unreliable but prioritized |
| CRITICAL | 8. Adverse events suggest authentic ivermectin not taken |
| CRITICAL | 9. Major event counts differ between paper and registry |
| CRITICAL | 10. Baseline data differs between paper and registry |
| CRITICAL | 11. Control group includes metformin, adjustment protocol violation |
| CRITICAL | 12. Primary outcome changes |
| CRITICAL | 13. All 7 secondary outcomes deleted |
| CRITICAL | 14. Metformin/fluvoxamine conclusions opposite of Together Trial, but matching earlier studies on each team |

CRITICAL

15. Author claims results from 596 researchers should be censored for false information

CRITICAL

16. Administration on an empty stomach

CRITICAL

17. Results delayed 6 months (including life-saving metformin results)

CRITICAL

18. Subject to participant fraud

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SERIOUS

19. Fewer comorbidities for serious outcomes

20. Control arm results very different between treatments

SERIOUS

21. COVID-19 specific symptoms hidden in appendix

SERIOUS

22. Authors claim placebo is not better than the treatments

SERIOUS

23. Incorrect claim that no treatment reduced severity

SERIOUS

24. False conclusion

SERIOUS

25. Trial outcomes modified

SERIOUS

26. Very high percentage of missing data

SERIOUS

27. Medication delivery varied significantly

SERIOUS

28. Treatment 3 days for ivermectin, 14 days for metformin and fluvoxamine

SERIOUS

29. SAP dated after trial

SERIOUS

30. Test requirement and delivery prohibits early treatment

SERIOUS

31. Conclusion modified by journal

SERIOUS

32. Symptom results contradictory

SERIOUS

33. Adherence very low

SERIOUS

34. Inconsistent blinding statements

SERIOUS

35. Author indicates a best guess can be used for onset

MAJOR

36. Ivermectin from source chosen has shown lower efficacy

MAJOR

37. Highest mean age for ivermectin, lowest for placebo

MAJOR

38. Adherence subgroups analysed but not reported

UNKNOWN

39. Maximum symptom duration not clear

UNKNOWN

40. No discontinuation due to hospitalization for ivermectin

COMMENT

41. Authors indicate up to 5 day delay in real-world usage

427

428 It is my opinion, the above actions by the investigators essentially prove that this trial was an
429 example of the Disinformation tactic called “The Fix” whereby investigators conduct a trial with
430 the intent of reaching pre-determined results, i.e. to show ivermectin does not work.

431

432 I find it troubling that Dr. Corneil would rely on a single RCT out of the [47 available](#) to support
433 his bold assertion that ivermectin is not effective against Covid-19. I must add here that the
434 COVID-OUT study was not the only “Fix” within the ivermectin evidence base. Studies with
435 similarly identified anomalies in the design and conduct of the trial include TOGETHER, Lopez-
436 Vallejo, and the two ACTIV-6 trials but a discussion of their deficiencies are beyond the scope
437 of this report. If interested, I refer you to the Chapter in my book called “The Big Six” (i.e. the 6

438 largest examples of “the Fake”. However, in addition to citing that one RCT, Dr. Corneil also
 439 cited a Cochrane Review which, if possible, has even more glaring issues than the COVID-OUT
 440 RCT above.

441
 442 Mmeta-analyses have long been considered stronger evidence than a single study or small
 443 collection of studies. I am concerned that multiple supportive meta-analyses were ignored by Dr.
 444 Corneil such as [Hariyanto et al](#), [Babalola et al](#), [Bryant et al](#), and [Kory et al](#).
 445

446 In addition, the ivermectin meta-analysis performed by the WHO, was ignored by Dr. Corneil.
 447

448 In the [WHO guideline](#), which has not been updated in over two and a half years, despite
 449 the evidence base now including 47 RCT’s, they included 6 RCT’s which studied mortality as an
 450 endpoint, and in those studies they reported 70 deaths per 1000 in the standard-of-care treated
 451 patients versus 14 deaths per 1000 in ivermectin treated patients, leading to a statistically
 452 significant **81% reduction in mortality**. The chart below is from the WHO guideline document:
 453
 454

Outcome Timeframe	Study results and measurements	Comparator Standard care	Intervention Ivermectin	Certainty of the Evidence (Quality of evidence)	Plain language summary
Mortality	Odds ratio 0.19 (CI 95% 0.09 – 0.36) Based on data from 1419 participants in 7 studies. ¹ (Randomized controlled)	70 per 1000 Difference:	14 per 1000 56 fewer per 1000 (CI 95% 63 fewer – 44 fewer)	Very low Due to serious risk of bias and very serious imprecision ²	The effect of ivermectin on mortality is uncertain.

455 In the “Certainty of the Evidence” column, they graded the evidence as having “very
 456 serious imprecision.” Know that the expert systematic reviewer team of [Lawrie et al](#) that has
 457 long worked for the WHO reached a different grading of the quality of evidence. More recently,
 458 they argue that “downgrading the quality of the evidence to this degree based on imprecision is
 459 incorrect when the treatment effect is so large, the outcome prevented is *death*, and the medicine
 460 is one of the safest, least expensive, and most widely available in the world.”
 461
 462

463 Further, I along with many other ivermectin experts strongly disagree with this rationale
 464 put forward by the WHO guideline College for not recommending ivermectin:
 465

466 *“Applying the agreed values and preferences, the GDG [Guideline Development Group]
 467 inferred that **almost all well-informed patients would want to receive ivermectin only in the**
 468 **context of a randomized clinical trial [emphasis mine], given that the evidence left a very high**
 469 **degree of uncertainty in effect on mortality, need for mechanical ventilation, need for**
 470 **hospitalization and other critical outcomes of interest and there was a possibility of harms, such**
 471 **as treatment-associated SAEs [serious adverse events].”**
 472*

473 Thus the WHO based their entire recommendation against ivermectin by arguing that
474 critically ill patients and their loved ones would rather participate in a placebo-controlled trial
475 instead of immediately being treated with one of the safest medicines in history (see next
476 section) at a time that the WHO's best available evidence found an 81% chance of reducing their
477 chances of dying. This is beyond absurd. I strongly disagree with how they apply and interpret
478 such positive evidence and is not a misinformed opinion of their findings.

479
480 Dr. Corneil chose to cite only the Cochrane Review of ivermectin by Popp et al but again, I am
481 concerned that he selectively relied on a single "supposedly negative" meta-analysis and ignored
482 multiple supportive meta-analyses such as [Hariyanto et al](#), [Babalola et al](#), [Bryant et al](#), and [Kory
483 et al](#). I believe he did so to best support his argument that ivermectin is ineffective. Yet I must
484 ask the question as to why an "expert" would ignore such a huge evidence base in drawing
485 conclusions?

486 Most troubling about the only review Dr. Corneil chose, is that Popp et al only selected 14 of the
487 31 published studies available at the time, rejecting large studies with positive effects on
488 questionable grounds, such as:

- 489 • a demand that only studies with PCR testing be included even though availability and
490 accuracy varied considerably, especially at the time;
- 491 • inconsistent rejection of comparators such as disallowing trials against
492 hydroxychloroquine even though it has been determined by these same reviewers to
493 without clinical effect and thus could properly serve as a control/comparator group;
- 494 • exclusion of combination therapies even though that is how it is actually used in practice.
495 A principal criticism the Popp authors had of favorable studies was inclusion of those
496 that used doxycycline in the intervention arm, complaining that the impacts of
497 doxycycline could not be separately determined. Popp, *ibid.* at 32-33. While there may
498 be some sense to this, given complications such as pneumonia, if doxycycline had a
499 significant therapeutic impact on COVID-19 we would live in a better world
- 500 • In five of the included studies in the unfavorable Popp review, subjects only received a
501 single dose, which could not have possibly reached therapeutic levels and are not valid
502 studies. Subjects only received the FLCCC-recommended dosing in 5 of the 14 studies.
503 *Ibid.* The study authors expressly state that they were aware of the dosing issue but did
504 not have sufficient information to look at dose-response curves, yet included low-dose
505 studies in the analysis in any event.
- 506 • Pre defined (and essentially arbitrary) time points for outcome measures (28 day
507 mortality, infection within 14 days) resulted in further exclusions.
- 508 • High Risk of bias studies were rejected for "primary" analyses.

509
510
511 The inclusion policies thus excluded much of the available trials data yet, they still were not
512 done whittling down the evidence base. Popp et al further fragmented the data by analyzing
513 inpatient and outpatient data as separate comparisons, though the patients had the same disease
514 and hospitalization criteria vary considerably according to local resource constraints.

515 More anomalous actions occurred when more than a year later, Popp et al [released an updated
516 version](#). They somehow managed to add new criteria so that 7 of the 14 studies they had included

517 the previous year were no longer eligible. Even though new trials were added, they ended up
518 with fewer studies in 2022 than in 2021.

519 It is generally not good practice for a systematic review to modify its protocol between
520 revisions—since it gives the impression of p-hacking taking place—but in an abundance of good
521 faith, I will assume the authors had their reasons for this alteration.

522 However, we quickly uncover even more problems. The new criterion—that did much of the
523 heavy lifting in terms of exclusions—was the “trial registration” criterion, specifically the
524 requirement that a trial be prospectively registered:

525

2	Trial registra- tion	Does the study report a trial reg- istry number?	Check in the publication or study report	If study is not prospec- tively registered, ex- clude the study
		Is the study prospectively regis- tered?	Check in the trials register the date of protocol sub- mission and first posted. Prospective registration is defined as registration of a trial before enrolment of the first participant as defined by the WHO. It must be deter- mined whether the registers registered (date first posted) without delay at this point in the pandemic. In case of doubt, check for the date first submitted or the authors must be asked for the sub- mission date.	

526

527 They are quite clear that if the date of registration is not *before* the date of the enrollment of the
528 first participant, the study should be excluded. In fact, on the basis of this criterion, they
529 excluded several studies they had included in their 2021 edition of their systematic review. The
530 excluded trials were: Abd-Elsalam, Biber, Chachar, Okumuş, and Shah Bukhari.

531 The problem is that, despite this clearly stated new exclusion criteria, they ignored it by
532 including the 4 largest studies, *all of which did not prospectively register their trial* prior to
533 enrolling the first patients. The four are TOGETHER, Vallejos, I-TECH. Kirti, and Gonzalez. By
534 violating their own trial protocol this invalidates the systematic review since 2,582 of the 3,409
535 patients included did not qualify for inclusion.

536 Another disturbing anomaly within the Popp et al review is that they the authors stated “serious
537 adverse events (SAE) including vision problems, neurotoxicity and liver damage can occur”
538 *though the cited source contains no such reports*. Moreover, the considerable literature on
539 safety is ignored (see next section).

540
541 Finally, know that none of the positive meta-analyses arbitrarily excluded such a large portion of
542 the evidence base. One expert [systematic review group's critique](#) of Popp et al's review, aptly
543 titled their paper "The uses and abuses of systematic reviews."

544
545 Finally, beyond the 100 controlled trials, 47 of them RCT's, and the numerous positive meta-
546 analyses of the ivermectin evidence base, there are a number of health ministry reports of early
547 treatment programs, all showing large reductions in hospitalization or death when ivermectin
548 was used. See:

- 549 · **La Misiones, Argentina** – Health Ministry analyzed the data from 4,000 ivermectin treated
550 patients and, compared to the rest of the population over the same time period, found a [75%](#)
551 [reduction in need for hospital](#) and an [88% reduction in death](#).
 - 552 · **Uttar Pradesh, India** – Using a strategy of [close surveillance combined with both](#)
553 [ivermectin](#) treatment of all positive cases and preventive treatment of all family contacts. On
554 September 10, 2021, [only 11 cases with no deaths were recorded in a population](#) of 241
555 million..with 67 of their 75 districts having no active cases at the time.
 - 556 · **The Brazilian city of Itajai** offered ivermectin as prevention to the entire city's population
557 with 133,051 (60%) agreeing to take ivermectin every two weeks for 6 months. Compared to the
558 45,716 city inhabitants that declined to use ivermectin, ivermectin [users were 47% less likely to](#)
559 [contract illness, had a 70% lower mortality rate, and a 67% lower hospitalization rate. By the end](#)
560 [of the 6 month program, the citywide COVID mortality fell from](#) 6.8% to 1.8%.
 - 561 · **La Pampas, Argentina** – Health Ministry compared over 2,000 patients they treated early
562 with ivermectin to over 12,000 without treatment and found that in patients over 40, rates of [ICU](#)
563 [admission and death both fell by 40%](#).
 - 564 · **Peru** – A nationwide mass-distribution program called "[Mega-Operación Tayta](#)" (MOT),
565 initiated at various times across 25 states of Peru in May 2020, led to a 74% drop in regional
566 excess deaths within a month, with *each drop* beginning 11 days after each MOT region's varied
567 start times
 - 568 · **The Health Ministry of Sultan Kudarat** in the Phillipines launched an ivermectin drive
569 and [found that cases rapidly dropped by 86%](#). compared to nearby regions
 - 570 · **In Japan**, the President of the Tokyo Medical Association recommended that all physicians
571 start to use ivermectin as early treatment during their summer surge. They are now [recording the](#)
572 [lowest rate of COVID hospitalization](#) in the pandemic.
- 573 Finally, [23 countries \(39 including NGO's\) have now given either partial or full approval](#) for use
574 in COVID, which encompasses 25% of the world's population.

575
576 Thus based on the large and consistently positive evidence base from RCT's , OCT's, and health
577 ministry reports, I find Dr. Hoffe's statements on the efficacy of ivermectin to be fully supported
578 by and consistent with the scientific evidence. I thus strongly disagree with Dr. Corneil's
579 assessment of Dr. Hoffe's statement.

580
581 **SAFETY OF IVERMECTIN**
582

583 I strongly agree with Dr. Hoffe’s statement that ivermectin is “*very, very safe, very effective*
584 *treatments for Covid...*” and that it is “*unbelievably safe.*”

585
586 Dr. Corneil instead finds that, “*Ivermectin, especially at high doses, can be dangerous for*
587 *humans and may cause serious health problems such as vomiting, diarrhea, low blood pressure,*
588 *allergic reactions, dizziness, seizures, coma and even death.*”

589
590 Dr. Corneil’s opinion characterizing Dr. Hoffe’s statement as incorrect, misleading etc. is easily
591 disproven with the available, extensive data on the nearly unparalleled safety of ivermectin in
592 treatment of both Covid and the 40 years history of global use to treat parasitic diseases.

593
594 In response to Dr. Corneil’s claim that ivermectin can cause low blood pressure, in this [scoping](#)
595 [review](#) of the safety of ivermectin, the author states “A sudden and marked drop in blood
596 pressure, severe skin reaction and liver injury have been mentioned in early safety reviews. The
597 clinical experience accumulated over the years showed these severe adverse events are
598 unequivocally extremely rare. The often-reiterated claim, even today, that ivermectin can be
599 lethal in treated patients only rests on a one-page correspondence to the Lancet published in
600 1997. This claim is deemed to be unfounded as it has never been further substantiated until today
601 and instead, 3 subsequent publications repeatedly showed this claim was either incorrect or
602 methodologically inaccurate.”

603
604 A number of reviews on the safety of ivermectin have been performed since the onset of the
605 Covid pandemic. One group of toxicologists published [a paper](#) finding that “Ivermectin was
606 generally well tolerated, with no associated CNS toxicity at doses up to 10 times the FDA-
607 approved maximum dose of 200 µg/kg. All doses had a mydriatic effect like a placebo. The
608 adverse experiences between ivermectin and placebo were similar and did not increase with the
609 ivermectin dose.”

610
611 Another [safety review](#) stated “The safety, availability, and cost of ivermectin are nearly
612 unparalleled given its low incidence of important drug interactions along with only mild and rare
613 side effects observed in almost 40 years of use and billions of doses administered.”

614
615 Further, the safety of standard doses of ivermectin (0.2 mg/kg x 1–2 days) have a nearly
616 unparalleled safety profile historically among medicines as evidenced by the following
617 findings:

- 618 • **WHO Guidelines for Scabies:** “the majority of side effects are minor and transient”
- 619 • **[Jacques Descotes, Toxicologist and Expert on Safety of Ivermectin:](#)** “severe
620 adverse events are unequivocally and exceedingly rare”
- 621 • **LiverTox Database:** Not considered toxic to the liver
- 622 • **Nephrotox Database:** Not considered toxic to the kidney
- 623 • **PneumoTox:** Not considered toxic to the lungs

624 **Safety of High Dose Ivermectin - COVID-19 Studies**

- 625 • [Randomized controlled trial](#) of ivermectin in COVID using 0.6mg/kg x 5 days
626 reported no differences in side effects
627 • [Randomized controlled trial](#), with 3 arms; one arm treated with 1.2 mg/kg x 5 days,
628 and another treated with 6mg/kg x 5 days with no differences in side effects.
629 • [A report by the State Health Minister](#) on 3,000 patients in La Pampa, Argentina who
630 were part of a “test and treat” program were given 6 mg/kg daily x 5 days. Liver
631 function tests and significant side effects were closely monitored and none were
632 reported as abnormal
633 • [A report by the Health Minister in Misiones](#), Argentina, also using 0.6 mg/kg x 5 days
634 with no significant adverse events reported.
635 •

636 **Malaria Studies**

- 637 • [Ivermectin alone was safe and well-tolerated](#) in macaques with repeated doses at 3
638 and 1.2 mg/kg x 7 days, with no signs of neurological, gastroenterological, or
639 hematological complications.
640 • Study of “[Efficacy and Safety of High dose ivermectin for Reducing Malaria](#)
641 [Transmission](#)” compared 0, 3 and 0.6 mg/kg x 3 days and found no differences in side
642 effects.

643 **Healthy Volunteers**

- 644 • [Report of a group of healthy adult subjects](#) given up to 10 x standard dose, either 2-4
645 x the standard dose three times a week or 6–10 x standard dose once and found the
646 doses generally well-tolerated.

647 **Systematic Reviews**

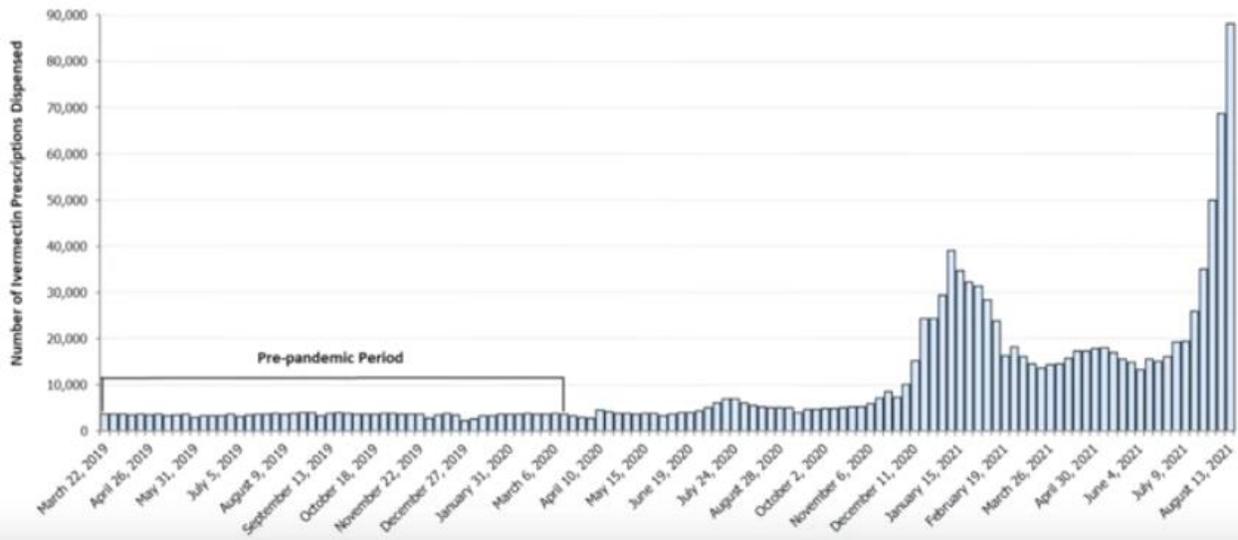
- 648 • [A systematic review and meta-analysis](#) of high dose ivermectin found no difference in
649 side effects between dose of up to 0.4 mg/kg and higher doses (up to 0.8 mg/kg doses
650 every 3 days)
651 • A comprehensive review of 350 articles by the famous French toxicologist Jacques
652 Descotes was presented in March 2021. [In this document](#), he states,
- 653 1. “Based on all the data presented above, the author of this report believes it is fair to
654 say that ivermectin did not directly induce an excess of deaths in treated groups of
655 human subjects. Statements, past or present, that ivermectin can kill patients, are
656 therefore considered to be misleading as they do not take into account all the medical
657 information that has been accumulated over the last decades.”
 - 658 2. “Only very few cases of accidental human overdose have been reported despite the
659 wide availability of ivermectin as a veterinary and human medicine [Hall et al., 1985;
660 Graeme et al., 2000; Deraemecker et al., 2014; Goossens et al., 2014]. Usually,
661 moderate neurotoxic manifestations with rapid recovery after unspecific supportive
662 measures were the predominating course of events. No accidental overdose including
663 in infants and young children had a lethal outcome.”

664 **Case Series**

665 1) [A case series of 3 children](#) with relapsed leukemia treated with high dose (1.0 mg/kg)
666 ivermectin daily for between 2 weeks and 6 months reported no significant adverse events.

667 Further, Ivermectin is on the WHO’s list of essential medicines, has been given nearly 4 billion
668 times around the globe and is widely considered a safe drug. According to the WHO, it is safer
669 than both aspirin and Tylenol. Its discoverers were honored with the Nobel Prize in 2015 for the
670 drug’s global and historic impacts in eradicating endemic parasitic infections in many parts of
671 the world. There is [good scientific evidence](#) that the escalating doses required to maintain
672 antiviral levels have been subjected to considerable testing and are in fact safe.

673 To better understand the overall safety signal in Covid it is useful to look at absolute numbers in
674 data from the FDA Adverse Events Reporting System (FAERS). While poison control calls and
675 FAERS each suffer from limitations, it is notable that reports for products containing ivermectin
676 actually fell slightly in 2020 and 2021, despite greatly increased use and dosing (see below data
677 demonstrating the massive rise in ivermectin prescriptions in the U.S), with a combined total of
678 503 adverse reports which was at an annual rate that is less than 2017-2019. Reports did not rise
679 post-COVID-19, but actually fell.
680



681
682

683 Safety Comparisons with Other Treatment Options
 684

  			
Medicine	Year started reporting	Deaths	Adverse events
Tetanus vaccine	1968	34	16,729
Measles vaccine	1992	36	10,357
Acetaminophen (Tylenol)	1968	4,120	203,990
Ivermectin	1992	26	7,380
<u>Paxlovid</u>	2022	74	44,290
Tocilizumab	2005	1,313	69,709
COVID-19 vaccines	2021	26,013	5, 275 222
Remdesivir	2020	728	11,056

685
 686
 687 As per above table using data from the WHO’s [Vigiaccess](#) surveillance database as of today
 688 January 12, 2023: there have been 16 deaths attributed to ivermectin *over a 30-year period*,
 689 while there have been 11,056 deaths attributed to Remdesivir though it was only approved by
 690 FDA on October 22, 2020 and given to far fewer patients. Remdesivir, which is considered the
 691 “standard of care,” was approved contrary to [WHO recommendations against its use](#) and a
 692 significant [body of literature](#) finding its risks outweigh any benefit.

693
 694 The level of side effects in such approved drugs is one of the reasons that the [Nebraska Attorney](#)
 695 [General](#) found that ivermectin prescribing was proper and his Opinion puts the ivermectin data
 696 into stark perspective by comparing them with [far more numerous adverse events](#) from
 697 Remdesivir’s use in COVID-19.

698
 699 Paxlovid is contraindicated if a patient is taking a [significant list of other drugs](#) and has a higher
 700 risk. Since its approval in 2022 it has already had 21,249 adverse event reports to Vigiaccess,
 701 which is three times the amount reported for ivermectin over the past 30 years. Molnupiravir has
 702 not shown high levels of effectiveness, shows 2,677 adverse events, and has not shown
 703 significant efficacy at [reducing death rates](#). Studies are continually published showing poor
 704 safety and effectiveness, for example a recent study in Lancet showing that “Molnupiravir did
 705 not reduce the frequency of COVID-19-associated hospitalizations or death among high-risk
 706 vaccinated adults in the community.” While these drugs may have a role to play in treatment, a

707 fair comparison shows that ivermectin is more effective and demonstrably safer than other
708 available treatments and far safer than the one drug—Remdesivir—that the FDA initially approved
709 for use against COVID.

710
711 Notably, there have been 100 studies with over 135,000 patients listed at <https://c19ivm.org/>
712 without a significant safety signal emerging.

713
714 Further, the principal investigator of the largest trial on ivermectin in Covid, Ed Mills, [stated in](#)
715 [March of 2022](#), during an NIH Collaboratory: “I would say that the safety analysis, you know,
716 ivermectin does not appear to cause much of a safety concern. That argument that has been put
717 forward by people I don't think holds very well at all.”

718
719 The concluding sentence of Jacques Descotes review of the safety of ivermectin: “*the author of*
720 *the present analysis of the available medical data concludes that the safety profile of ivermectin*
721 *has so far been excellent in the majority of treated human patients so that ivermectin human*
722 *toxicity cannot be claimed to be a serious cause for concern.*”

723
724 Finally, in a [meta-analysis of 11 RCT's](#) in Covid, assessing 1533 participants, there was no
725 significant difference between ivermectin and control in the risk of severe adverse events (aRR
726 1.65, 95% CI 0.44–6.09; $I^2 = 0\%$).

727
728 Thus, it is clear from the accumulated and published evidence that Dr. Hoffe’s statement is
729 highly scientifically accurate, unlike the conclusion of Dr. Corneil.

730
731

732 **IVERMECTIN ACCESS:**

733 Statement (e). In an interview presented by Quo Vadis (“QV TV”), video of which was posted
734 online on or around October 2021, at 02:30:58 - 02:31:39, in response to the question, “what is
735 the best approach with a doctor that is pro-vax uh, or will not prescribe ivermectin?”, Dr. Hoffe
736 stated:

737
738 “*Yeah well now, no doctors are allowed to prescribe ivermectin in BC or Alberta. If you can find*
739 *somebody [inaudible] in another province, they might, but most doctors will not because they’re*
740 *afraid of getting investigated by their college.” Someone in the audience asked, “how do we buy*
741 *it then?”. Dr. Hoffe stated, “[inaudible] you can go to a feed store that sells stuff for livestock*
742 *and tell them you’ve got a herd of sheep and you need ivermectin [laughter from the audience].*
743 *Someone from the audience stated, “that’s a serious question”. Dr. Hoffe stated, “Yeah, no, and*
744 *I’m being serious. That’s a serious [inaudible] you literally, the government is forcing people to*
745 *use veterinary products”.*

746
747 The accuracy and soundness of Dr. Hoffe’s statement regarding access to ivermectin can only be
748 understood in the context of the Disinformation campaign I described at the beginning of this
749 report.

750
751 I am a physician who has treated over a 1,000 Covid patients with ivermectin since October 2020
752 and am regularly in communication with a network of ivermectin experts and researchers globally.

753 I can attest that the ability of patients in many countries to access ivermectin became increasingly
754 difficult. In the United States, I observed an abrupt change in my ability to prescribe ivermectin
755 through retail pharmacies whereby suddenly pharmacists all over the country began to refuse to
756 fill valid prescriptions. This change was most pronounced immediately following what I call “the
757 Horse Dewormer PR Campaign” which began in late August of 2021 (Chapter 33, the “War on
758 Ivermectin,” Exhibit C). That sequence of actions and events led to the publication on Sept. 1,
759 2021 of a [joint statement](#) by the American Medical Association, the American Pharmacists
760 Association, and the American Society of Health-System Pharmacists whereby they “strongly
761 oppose the ordering, prescribing, or dispensing of ivermectin to prevent or treat COVID-19 outside
762 of a clinical trial.”

763
764 Other countries and regions, like in BC and Alberta went further, effectively threatening the
765 licenses of physicians who prescribed ivermectin. Such actions effectively restricted the ability of
766 acutely ill Covid patients to access what I have shown above, to be a life-saving drug. Physicians
767 who were aware of the vast extent of data proving its life-saving efficacy were put into a difficult
768 situation given that, As Dr. Hoffe correctly mentions, their governing bodies caused this
769 “blockade” to happen.

770
771 Given that the Hippocratic Oath to which we physicians abide includes the statement, “I will do no
772 harm or injustice to them (patients), such a mandate left few options for an ethical physician to
773 navigate in the situation of a restriction of access to human forms of ivermectin..

774
775 Given his statement was made in October of 2021, prior to the availability of paxlovid or
776 molnupiravir, it must be understood that there was no other treatment option available with
777 demonstrated efficacy. So, a physician faced with caring for a patient with a potentially life-
778 threatening illness could simply offer supportive care only and hope deterioration and death would
779 not occur, or they could attempt to gain access to a life-saving therapy for their patient.

780
781 As a U.S citizen, I was in a much better position than Dr. Hoffe in that I found that our system of
782 independent, small business, compounding pharmacies with rare exceptions, routinely filled my
783 valid prescriptions.. Many of us early treatment experts began circulating lists of “safe pharmacies”
784 that would fill our prescriptions and would not report us to regulatory bodies. Dr. Hoffe did not
785 have that option.

786
787 In my book, The War on Ivermectin, Chapter XX, I included numerous testimonials sent to me of
788 patients who rapidly recovered after taking animal versions of ivermectin, and further testimonials
789 by family members who “snuck in” animal versions to treat patients in hospitals who also reported
790 positive results.

791
792 Further, although we know that animal sources of ivermectin are not manufactured to the same
793 quality standard as human versions, I am aware of only a handful of reports of adverse events
794 related to use of animal versions, however I am not aware of any data showing that the human
795 version was then better tolerated. Adverse effects can happen with the human version as well. One
796 fact to be aware of is that the liquid formulations of animal ivermectin generally contain only three
797 ingredients –1% ivermectin, 40% glycerol formal, and propylene glycol. Glycerin formal has
798 excellent performance and is **harmless to human body** and has no toxic and side effects. **Propylene**

799 glycol is considered generally safe by US and European authorities. There is only one
800 documented case of propylene glycol toxicity and was caused by excessive alcohol intake. Despite
801 this knowledge, I agree that none of the animal products are manufactured to human standards nor
802 are they tested in humans. Thus, there is a theoretical risk of harm to a human from using an animal
803 product. However, I would maintain that the risk is likely a trivial one based on my knowledge of
804 many physicians across the world who reported to me that they were forced to rely on prescribing
805 animal versions due to lack of access to human version, and along with the many patients who
806 reported to me that they prophylaxed with ivermectin on a weekly or biweekly basis throughout the
807 pandemic.

808
809 Know that physicians, when making treatment decisions, must balance the risks and benefits of a
810 particular treatment as well as a consideration of alternatives to the treatment. In the situation of
811 having the responsibility to care for a patient with a potentially life-threatening disease, in a
812 situation where your governmental regulatory agencies have restricted access to a very safe, life-
813 saving treatment, I find it not only practical but admirable that a physician would attempt to guide
814 patients with a route to accessing a medicine that could save their lives.

815
816 This is an extremely challenging ethical situation with no easy answers. Although I am glad I
817 personally never had to recommend someone use an animal version of ivermectin, had I been in a
818 situation like Dr. Hoffe and other doctors were in Alberta and BC, I personally would not have
819 hesitated to recommend patients to get access to the animal version. It is the least worst option in
820 my opinion. I have seen to many people die or become disabled from Covid infections. I know of
821 no deaths or disability resulting from ivermectin. I remind the reader and the College that this
822 situation was not created by Dr. Hoff and he attempted to provide the most sound guidance on how
823 to navigate it. I again later lay blame at the feet of the pharmaceutical industry and public health
824 agencies and professional societies who consistently chose not to critically or expertly assess the
825 evidence for ivermectin like I have done above. It is they who should be litigated against and
826 punished. Not Dr. Hoffe.

827
828

829 ***SHEDDING:***

830
831 Statement (j). In an interview presented by QV TV, video of which was posted online on or
832 around October 2021, at 02:03:56 – 02:05:12, in response to the interviewer asking, “Can you
833 explain what shedding is and should we be concerned?”, Dr. Hoffe stated:

834
835 *“Yeah so shedding, shedding is an interesting one. There is something that comes out of the skin*
836 *and the breath of vaccinated people that causes bleeding and clotting in other, in nonvaccinated*
837 *people. And it has been reported all around the world, particularly in women, for*
838 *some reason, I suppose because women have have menstrual cycle and that sort of thing. So it*
839 *has caused [inaudible] miscarriages, it has caused [inaudible] very erratic and heavy periods, it*
840 *has caused women who are post-menopausal to start bleeding again, and Pfizer, if you read the*
841 *study design [inaudible] for Pfizer, it’s page 67 and 68, they record that something is released*
842 *from the skin and the breath of vaccinated people that can effect pregnant or breast-feeding*
843 *women. They didn’t say what it was. But it is, the effect has been noted around the world. So we*

844 *don't know exactly what they're shedding, but there is something that causes disease in*
845 *nonvaccinated*
846 *people”.*

847
848 Dr. Corneil's assessment of Dr. Hoffe's statement contained numerous ignorances and
849 inaccuracies as follows:

850
851 First, Dr. Corneil's response reveals immediately that he is wholly ignorant of the definition of
852 “shedding” in the context of a gene therapy. He instead relied on the definition used in context of
853 a viral illness or traditional vaccine. When in the context of a gene therapy product, in this FDA
854 document called “Design and Analysis of Shedding Studies for Virus or Bacteria-Based Gene
855 Therapy and Oncolytic Products: Guidance for Industry” the FDA defines shedding as follows:

856
857 *“The release of viral or bacterial gene therapy products from the patient by any or all of the*
858 *following routes: feces (feces); secretions (urine, saliva, nasopharyngeal fluids, etc.); or through*
859 *the skin (pustules, lesions, sores).”*

860 Based on his written assessment of Dr. Hoffe's statement above, it appears that Dr. Corneil is
861 unaware that the Covid mRNA “vaccines” are actually gene therapy products. To wit, *gene*
862 *therapy medicinal products* (GMTPs or GTP's) are defined in the FDA's [2015 document on](#)
863 [Gene Product Shedding Studies](#):

864
865 *“Gene therapy products are all products that mediate their effects by transcription and/or*
866 *translation of transferred genetic material and/or by integrating into the host genome and that*
867 *are administered as nucleic acids, viruses, or genetically engineered microorganisms.*

868
869 Also note that in this European Medicines Agency (EMA) [document](#), the mRNA vaccines also
870 meet their definition of gene therapy medicinal products (GMTP's).

871
872 So beyond not understanding that the Covid vaccines are gene therapy products and that all gene
873 therapy products are at risk of being shed, Dr. Corneil also seems unaware that the FDA literally
874 recommends shedding studies be done for all gene therapy products in both humans and animals,
875 as per the FDA's [2015 document on Gene Product Shedding Studies](#).

876
877 So, the FDA knows there are real risks that a product of a gene therapy can be shed from one
878 person to another. For instance, in [this insert](#) of the first ever approved gene therapy product
879 called Luxterna, they warn:

- **Shedding** of LUXTURNA

Transient and low level shedding of LUXTURNA may occur in patient tears. Advise patients and/or their caregivers on proper handling of waste material generated from dressing, tears, and nasal secretion, which may include storage of waste material in sealed bags prior to disposal. These handling precautions should be followed for up to 7 days following LUXTURNA administration.

Manufactured by:
Spark Therapeutics, Inc.
3737 Market Street
Philadelphia, PA 19104

US License #2056

880
881 So, its prescribing information specifies that Luxturna can be found in a patient’s tears after
882 injection and it hence for the first seven days after injection, care must be taken to avoid anyone
883 else coming in contact with those tears to prevent unintended shedding of the product. Another
884 similar gene therapy, [Roctavian](#) also [was found to shed](#) (e.g., into semen), and the FDA advises
885 those who receive it to not donate semen or impregnate someone for at least 6 months after
886 administration. Finally, Zolgensma, a gene therapy, utilizing a different virus [was also found to](#)
887 [shed for a month](#), and its package insert advises that during this time, to be careful of how feces
888 from the patients are disposed of (so no one else is exposed to it).

889 Unfortunately, due to the fact the vaccines were developed at “warp speed,” no shedding studies
890 were done in humans. However, according to [this paper](#), via a Pfizer document obtained by
891 FOIA it was revealed that shedding of their mRNA vaccine was studied in the urine and feces of
892 intra-muscular injected rats. Unfortunately, [that document](#) is no longer at the website referenced.
893

894 Now, in the case of the Covid vaccines, the “products” that are at risk of being shed from one
895 person to another would be the spike protein and/or the components of the vaccine which include
896 lipid nanoparticles, naked mRNA, and polyethylene glycol (PEG).
897

898 Another category of technology that the Covid mRNA “vaccines” fall under is “nanoparticle
899 technology” given that the mRNA is delivered to the cell within lipid nanoparticles.
900 Nanoparticles exist in both natural, biological forms (called exosomes) as well as synthetic ones
901 such as in the lipid nanoparticles (LNP) of the mRNA vaccines. Importantly, synthetic mRNA
902 vaccine LNPs [have the same structure](#) as the natural exosomes they seek to mimic.
903

904 From [this paper](#) in Molecular Therapy, they state:

905
906 *Exosome-like nanovesicles (ELNVs) are biological nanostructures of 40–150 nm, are secreted by*
907 *most types of cells and relay information between cells and organisms across all three kingdoms*
908 *of life. Although earlier perceived to be cellular debris and hence undervalued, ELNVs are now*
909 *acknowledged as crucial entities to regulate physiological functions of multicellular organisms*
910 *in an intercellular transmission manner.*
911

912 The most important fact to remember is that the smaller the size of an LNP or exosome, the more
913 widely they distribute and the more easily they can enter the body.

914 Now, to prove that mRNA vaccine product shedding is occurring and can occur, I maintain that
915 evidence for the following mechanisms is required:

- 916 1) The LNP's with mRNA or the produced spike protein would have to distribute
917 widely in the body (so excretion from the lungs, urine sweat, breast milk etc could
918 then be possible).
- 919 2) The spike protein would then have to be found in exosomes in sufficient
920 quantities in body fluids or exhaled breath.
- 921 3) LNP's and/or spike protein containing exosomes would then have to be able to be
922 absorbed into the body of someone nearby, with the most worrisome route being
923 via inhaled breath.
- 924 4) Finally, typical vaccine adverse event symptoms would need to be documented in
925 unvaccinated people (or vaccinated) after being closely exposed to other
926 vaccinated people.

927
928 Before I go through the evidence for each of the above steps needed to “prove” that shedding of
929 Covid vaccine mRNA is real, first know that Pfizer knew the risks of shedding because, [in their](#)
930 [trial protocol](#) (I used Dr. Corneil's citation for the Pfizer trial protocol but it no longer exists
931 there, instead the page says “access denied”):

932
933 1) they prohibited pregnant women or those breast feeding from receiving the vaccine (or
934 future doses if they had already received one). I can only interpret this as meaning that Pfizer
935 knew of a theoretical risk of a breast feeding mother could expose her child to the vaccine or a
936 component of it.

937 2) Stated it needed to be reported if a pregnant women (e.g., a healthcare worker in the trials)
938 was exposed to the intervention by inhalation or skin contact from someone who had been
939 vaccinated.

940 3) Stated it needed to be reported if someone in the previous category (not vaccinated but
941 exposed to someone who was) then was in close proximity to their wife and their wife was
942 pregnant

943 The above exclusion criteria indicate that Pfizer was following the existing standards that [the](#)
944 [FDA stipulates](#) for gene therapies, i.e. they need to be evaluated for shedding before being given
945 to humans (and furthermore be subsequently tested in humans).

946 Now, lets go through the evidence supporting the dynamics required to transmit an mRNA vaccine
947 product from a vaccinated person to another.

948 **Shedding Condition #1**

949 *“The LNP's with mRNA or the produced spike protein would have to distribute widely in the*
950 *body (so excretion from the lungs, urine sweat, breast milk etc could then be possible).”*

951
952 Evidence:

953

954 Dr. Corneil dismisses the possibility of the above by stating “the vaccine stays in the arm.” This
955 is a false statement. From a recently [leaked EMA letter](#), we now know the synthetic LNP’s
956 containing vaccine mRNA are distributed widely in the body. Second, from a Japanese FOIA’ed
957 document of [the lipid nanoparticle biodistribution data for Pfizer’s vaccines](#), it is clear the LNP’s
958 distribute widely. In addition, the Therapeutics Goods Administrations (TGA) of
959 Australia’s [evaluation report](#) on Pfizer’s nonclinical biodistribution study alarmingly revealed
960 that the lipid nanoparticles which encase the mRNA, travel to the liver, spleen, brain, eyes, bone
961 marrow, adrenal glands, **ovaries and testes**— nearly every organ tissue.

962 **Shedding Condition #2**

963 *“The spike protein would have to be found in exosomes in sufficient quantities in body fluids or*
964 *exhaled breath.”*

965
966 Evidence:

967
968 [One study](#) found that significant amounts of spike protein containing exosomes (which circulate
969 in the bloodstream) [increase rapidly after vaccination \(and then decline\)](#) and appear to be one of
970 the primary means responsible for the vaccine antibody response.

971
972 In addition, significant amounts of RNA containing exosomes can be found in breath, and those
973 exosomes (which derive from the lungs) vary depending upon on the disease state someone has
974 (see [this 2013 paper](#), [this 2020 paper](#) and [this 2021 paper](#)—since this is a new field of research,
975 each paper is more sophisticated than the preceding one).

976
977 Another concern is from [another study](#) which found that vaccine mRNA is present from day one
978 and persists in the bloodstream for at least 2 weeks after injection; its concentration starts to
979 decrease after 4 days. Note this is much longer than was claimed by the manufacturers on the
980 basis of brief studies in rats.

981
982 From the conclusion:
983 *In conclusion, we showed that BNT162b2 vaccine mRNA remains in the systemic circulation of*
984 *vaccinated individuals for at least 2 weeks, during which it likely retains its ability to induce S-*
985 *protein expression in susceptible cells and tissues.*

986
987 Another [study](#) found that vaccination with mRNA and translation of the mRNA induces the
988 production of exosomes carrying the spike protein and circulating in the blood 14 days after
989 injection and **up to 4 months after**.

990
991 [Another](#) group similarly found that the spike protein concentration rapidly increases in blood
992 after vaccination (within 1 to 3 days) and persists in the bloodstream for more than a week.

993
994 Although they report that the spike is completely eliminated within 1 month a more [recently](#)
995 [published study](#) which looked much more carefully, found spike protein circulating in the blood
996 up to 187 days after vaccination (after which they stopped testing and finished their study).

997
998 The spike protein has a high (heparin dependent) [affinity for binding to the surface of exosomes](#).

999 Long COVID (and more severe acute COVID as well as [Long Vax](#)) is characterized by the
 1000 presence of spike protein studded exosomes (see [this paper](#) and [this paper](#)). Additionally, they
 1001 also showed exosomes from COVID patients [are highly inflammatory](#) (and [potentially clot](#)
 1002 [forming](#)) and [are taken up by the lung cells](#).

1003
 1004 The most detailed study (and imaging) of spike protein containing exosomes can be found [in this](#)
 1005 [paper](#) (which also found that spike protein containing exosomes can circulate a year after
 1006 COVID infection). For example, [this research team reported](#) that the spike protein persists for a
 1007 long time in free form: full-length spike is detected up to day 15, with a peak at 62 pg/mL. After
 1008 the 2nd dose, free spike is no longer detected as *it would be* bound to antibodies (but the study
 1009 did not look for antibody-spike immune complexes).

1010 A table from [this paper](#) on spikeopathy summarizes the studies showing persistence of spike
 1011 protein and other vaccine components as below:

Figure 8. Spike protein in blood (isolated from blood) after COVID-19 [52]
 Table 1. Studies demonstrating persistence of vector-based vaccine constituents and/or derivative spike protein.

Author	Constituents/Tissue Type/Assay Technique	Duration Measured
Animal		
Pfizer (Japanese MoF) 2020 [46]	Radiolabelled LNP in plasma and tissues	140 h-14 days
Human		
Ogata et al. (2021) [52]	Spike protein and S1 subunit (assay)	3 days
Bansal et al. (2021) [57]	Spike Protein	4 months
Fertig et al. (2022) [50]	LNPs and mRNA	15 days
Röllgen et al. (2022) [53]	mRNA and Spike Protein in ipsilateral lymph nodes; 2-7 days post dose in blood	60 days
Yamamoto et al. (2022) [58]	Spike Protein in skin	3 months
Yonker et al. (2023) [54]	Spike Protein in blood	1-19 days in cases of myocarditis
Castruita et al. (2023) [51]	mRNA in plasma	28 days

1012
 1013

1014 Clinical and pathologic evidence are available as well: a [case report of an autopsy done](#) in a man
 1015 who died of multifocal necrotizing encephalitis three weeks after the vaccine found vaccine
 1016 spike in numerous organs (heart, brain, muscles, germinal centers etc.). Further, they emphasized
 1017 the finding of high concentrations in the walls of capillaries.

1018
 1019 Finally, a team led by the esteemed senior German Pathologist Arne Burkhart, stained autopsy
 1020 specimens for the presence of spike protein. He has presented their findings in multiple [invited](#)
 1021 [lectures](#) and reported that out of the first 50 autopsies performed at the request of families who
 1022 suspected their loved one's death was due to the vaccine, in 80% of cases spike induced organ
 1023 damage was determined to be the proximate cause of death.

1024
 1025 **Shedding Condition #3**

1026 *“LNP’s and/or spike protein containing exosomes would then have to be able to be absorbed into*
 1027 *the body of someone nearby, with the most worrisome route being via inhaled breath.”*

1028
 1029 Evidence that LNP’s from vaccinated people can be transmitted to and subsequently enter our
 1030 bodies can be found in this [this review](#) of nanoparticles (i.e LNPs/exosomes):
 1031

1032 As far as the exposure of humans to NPs is concerned, they can enter the body through
 1033 inhalation, ingestion, skin uptake, injection, or implantation. It is also interesting to note that NP
 1034 uptake could be intentional or non-intentional. Some exposures are unintentional, such as
 1035 pulmonary inhalation of NPs in the environment or at manufacturing sites.”

1036
 1037 The below figure from the above paper illustrates the various routes of absorption and
 1038 dissemination of nano particles throughout the body:

1039

Figure 1

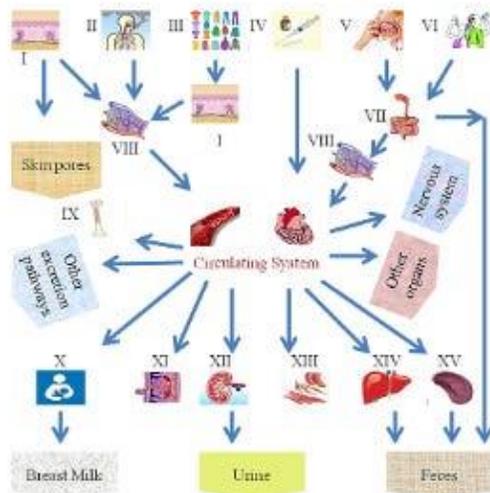


FIGURE 1. Scheme of the different exposure routes of nanoparticles in the human body. (I) Skin, (II) inhalation, (III) fabric, (VI) intravenous injection, (V) food intake, (VI) water intake, (VII) gastrointestinal tract, (VIII) lymph, (IX) bone marrow, (X) breast milk, (XI) placenta, (XII) kidney, (XIII) muscles, (XIV) liver, and (XV) spleen.

1040
 1041

1042 In a [paper from 1999](#) they state that nanoparticles (NPs) can cross the biological barriers
 1043 shielding various parts of the human body, such as the blood-testes barrier and enter the testes in
 1044 animal models.

1045
 1046 In [this review](#) of nanoparticles (i.e LNPs/exosomes) they state:

1047
 1048 “As far as the exposure of humans to NPs is concerned, they can enter the body through
 1049 inhalation, ingestion, skin uptake, injection, or implantation. It is also interesting to note that NP
 1050 uptake could be intentional or non-intentional.

1051
 1052 [In another review paper on nanoparticles they state:](#) “these ultrafine particles are capable of
 1053 entering the body through skin pores, debilitated tissues, injection, olfactory, respiratory and
 1054 intestinal tracts. These uptake routes of NPs may be intentional or unintentional. Their entry may
 1055 lead to various diversified adverse biological effects. Until a clearer picture emerges, the limited
 1056 data available suggest that **caution must be exercised when potential exposures to NPs are**
 1057 **encountered. These nanosized particles are likely to increase unnecessary infinite**
 1058 **toxicological effects on animals and environment; although their toxicological effects**
 1059 **associated with human exposure are still unknown.**

1060

1061 Further, there is a large and growing body of research in the development of a “LNP nanoparticle
1062 therapeutics” (i.e. using LNP’s to deliver drugs and/or corrective genes). Currently, therapeutic
1063 nanoparticles have been successfully administered: [transdermally](#), [transfollicularly](#), [intranasally](#),
1064 via inhalation and then excreted via [urine](#), [feces](#), [saliva](#), [breast milk](#), exhaled breath, [sweat](#), and
1065 transcutaneously ([here](#), [here](#), [here](#)).

1066
1067 I believe the inhalation route to present the highest risk of absorbing shed gene therapy-based
1068 vaccine products. The findings in [this paper](#) from 2005 are support that likelihood:
1069 *When inhaled, specific sizes of NSPs (nano-sized particles, i.e. LNP’s/exosomes) are efficiently*
1070 *deposited by diffusional mechanisms in all regions of the respiratory tract. The small size*
1071 *facilitates uptake into cells and transcytose across epithelial and endothelial cells into the blood*
1072 *and lymph circulation to reach potentially sensitive target sites such as bone marrow, lymph*
1073 *nodes, spleen, and heart.*

1074
1075 [This randomized, double-blind controlled trial](#) in *The Lancet* found that in humans, liposomal
1076 DNA gene therapy loaded nanoparticles administered locally by nebulization transfected airway
1077 cells. This was validated by the fact the cystic fibrosis patients treated in this manner experienced
1078 a stabilization of lung function, while the placebo group experienced a decline.

1079
1080 [Clinical trials](#) for influenza prevention have shown the efficacy and safety of inhaled mRNA
1081 vaccines. [This study reported 3 clinical trials](#) that used aerosol as the route of administration. In
1082 2022, [this study](#) showed that exosomes were effective via nebulization therapy in COVID-19
1083 patients. Finally, extracellular vesicles by inhalation (ongoing trial against Alzheimer's disease)
1084 is [being studied](#).

1085
1086 Lastly, [a 2023 peer-reviewed study](#) found that unvaccinated individuals who were around
1087 COVID-19 vaccinated individuals developed an immune response to the spike protein. Although
1088 the authors hypothesize that “antibodies” were transferred, I disagree based on the above, I
1089 maintain that the children were exposed to spike and then made antibodies. I am unaware of data
1090 showing that humoral (antibody) immunity can be transferred to children outside of the womb.

1091
1092 **Shedding Condition #4**
1093 *“Documentation of typical Covid mRNA vaccine adverse event symptoms in unvaccinated people*
1094 *after exposure to Covid mRNA vaccinated people.”*

1095 I will first begin with the evidence for placental shedding/transmission of LNP’s.

1096
1097 Animal studies clearly indicate that nanoparticles [can transit](#) through ordinary placental
1098 transcellular transport. In [this paper](#), they report that in animal models “nanoparticles can readily
1099 pass through the placental barrier” and, more disturbingly, “that NP’s less than 240 nm have
1100 transplacental activity in an ex vivo human placental perfusion model.” It is worth noting that the
1101 LNP’s in the Covid mRNA vaccines range from [100-400nm](#) in size. Further, in [one mouse study](#),
1102 they developed a PEG-ylated LNP similar to the COVID mRNA vaccines that could get to the
1103 uterus as a therapeutic delivery mechanism. Apparently, they succeeded given the study

1104 conclusion: *“These LNPs may provide a platform for in utero mRNA delivery for protein*
1105 *replacement and gene editing.”*

1106
1107 There are significant amounts of data showing risks of the Covid mRNA vaccines to fetuses in
1108 pregnancy. Let’s start, again, with this [document](#) obtained by FOIA from Pfizer and the FDA:

1109

3. RESULTS

Of the 673 case reports identified in the search, 458 involved BNT162b2 exposure during pregnancy (mother/fetus) and 215 involved exposure during breast-feeding.

- In 210 out of the 458 cases, maternal exposure (PTs Maternal exposure timing unspecified, Maternal exposure during pregnancy, Maternal exposure before pregnancy, Exposure during pregnancy) was reported either with no associated AEs or with AE off-label use/product use issue for either the mother or the baby.
- Among the remaining 248 cases, the most commonly reported AEs were product use issue (83), off-label use (81), pain (including but not limited to vaccination site pain/pain/pain in extremity)(101), headache (57), abortion spontaneous (51), fatigue (43), pyrexia (26), chills (24), myalgia (23), nausea (22), arthralgia (16), dizziness (15), malaise (12), lymphadenopathy (11) and asthenia (11).

1110
1111

1112 To summarize the above, Pfizer received 458 reports of mothers “exposed’ to the vaccine while
1113 pregnant. In 248 (54%) reports, an adverse event was reported. 53 of the 248 adverse events
1114 involved spontaneous abortion, which they then “excluded” 17 due to having comorbidities or
1115 history of spontaneous abortion, an exclusion which I disagree with.

1116

1117 For instance, there is an unacceptable amount of spontaneous abortion reports within 1-10 days
1118 of the vaccine, and then a large number where the temporal association is left quite vague, i.e.
1119 “received vaccination in first trimester and abortion occurred at 6 weeks.” This suggests
1120 vaccination occurred right before the spontaneous abortion (given that the average time that
1121 women realize they are pregnant is at [5.5 weeks](#) from conception). Take some time to peruse the
1122 below list of events:

1123

- There were 53 reports of spontaneous abortion (51)/ abortion (1)/ abortion missed (1) following BNT162b2 vaccination. Of these reports, 4 cases were COVID-19 positive (including suspected), and 13 cases had relevant medical history of endometriosis (1), abortion spontaneous (10), polycystic ovaries (1), menstruation irregular (1). These cases were therefore excluded from the review. One patient had a medical history of COVID-19 (unknown if ongoing) and was excluded from the review. The remaining 39 cases are summarized in Table 1.

Table 1. Summary of Patients with Outcome of Pregnancy – Abortion spontaneous

Age	Medical History	Outcome of Pregnancy
40 years	Not provided	The patient was unaware of her pregnancy at the time of vaccination. Suspected abortion occurred at 6 weeks of pregnancy.
37 years	Not provided	Patient received vaccine during first trimester (1-12 weeks) on 19 Jan 2021 and suffered spontaneous abortion on 3 Feb 2021.
33 years	Not provided	Patient received first dose of vaccine during first trimester (1-12 weeks). Abortion occurred at 3 weeks of pregnancy.
32 years	Not provided	Patient was vaccinated during first trimester (1-12 weeks) on 23 Dec 2020 and suffered a spontaneous abortion on 06 Jan 2021.
39 years	Asthma / Eosinophilic oesophagitis	Patient received vaccination at gestation of 6 weeks and spontaneous abortion occurred 11 days post vaccination.
31 years	Not provided	Patient experienced spontaneous abortion 5 days after receiving 2nd vaccine at 6 weeks pregnant.
35 years	Asthma / Gastroesophageal reflux disease	Patient experienced missed abortion in the 2nd week of pregnancy on an unspecified date with outcome of unknown.
33 years	Pregnancy	The patient was unaware of her pregnancy at the time of vaccination, which occurred at gestational age of approximately 3 weeks. Spontaneous abortion occurred at gestational age of 6 weeks.
34 years	Pregnancy	Patient was 3 weeks pregnant at the time of the first vaccination, without knowing she was pregnant. She found out she was pregnant one week after the vaccination. She then had a spontaneous abortion in week 6 of pregnancy.
Unknown	Not provided	Patient received vaccine at an unspecified time during pregnancy Spontaneous abortion, gestational age unknown.
34 years	Continuous positive airway pressure / Overweight / Sleep apnoea syndrome	Patient reported that she was unknowingly pregnant upon receiving COVID-19 vaccine dose 1. Spontaneous abortion occurred at 4 weeks of pregnancy.
Unknown	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 5 weeks of gestation.
37 years	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 6 weeks of pregnancy.
31 years	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 5 weeks of gestation.
32 years	Not provided	Patient received her first vaccine dose at 3 weeks of pregnancy and experienced spontaneous abortion about 5-6 days before her second dose.

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Table 1. Summary of Patients with Outcome of Pregnancy – Abortion spontaneous

Age	Medical History	Outcome of Pregnancy
23 years	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 1 month of pregnancy.
29 years	Pregnancy	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 4-5 weeks of gestation.
34 years	Not provided	The patient experienced spontaneous abortion at a routine OBGYN visit, gestational age unknown.
38 years	Not provided	Patient had spontaneous abortion at 12 weeks after receiving the second dose of vaccine.
29 years	Anxiety/Seasonal allergy	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 6 weeks of gestation.
41 years	Pregnancy	Patient was vaccinated during first trimester (6 weeks, also reported 1-12 weeks). Spontaneous abortion was diagnosed on 09 Jan 2021 (17 days after vaccination administration). The patient had spontaneous abortion at 5.5 weeks, which was conceived 3 days after receiving the vaccine.
32 years	Pregnancy	The patient was unaware of her pregnancy at the time of vaccination. Spontaneous abortion occurred during 5th week of pregnancy.
36 years	Allergy to animal/Food allergy/Seasonal allergy	Patient was vaccinated during first trimester (1-12 weeks). Spontaneous abortion occurred 1 week after first dose.
30 years	Clinical trial participant	Patient was vaccinated during first trimester (1-12 weeks). Spontaneous abortion occurred 1 day after vaccination.
26 years	Not provided	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion, gestational age unknown.
28 years	Not provided	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion, gestational age unknown.
Unknown	Not provided	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion, gestational age unknown.
25 years	Not provided	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion, gestational age unknown.
Unknown	Not provided	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion, gestational age unknown.
34 years	Not provided	Patient received vaccine at 4 weeks 5 days of pregnancy. Spontaneous abortion occurred during Week 8 of gestation.
29 years	Pregnancy	Patient experienced spontaneous abortion 10 days after first dose of vaccine during first trimester of pregnancy.
21 years	Not provided	Patient was vaccinated during first trimester (1-12 weeks) and experienced spontaneous abortion after 12 days.
30 years	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred at 11 weeks of pregnancy.
36 years	Coronavirus test negative/Deep vein thrombosis	Patient received vaccine at an unspecified time during pregnancy. Spontaneous abortion occurred at 4 weeks of pregnancy.
39 years	Drug hypersensitivity	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred during Week 8 of gestation.
26 years	Not provided	Patient received vaccine during first trimester of pregnancy. Spontaneous abortion occurred after 5 weeks of pregnancy.
Unknown	Not provided	Spontaneous abortion occurred 3 days post first dose of BNT162b2.
Unknown	Not provided	Miscarriage after receiving both doses of COVID-19 vaccine

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1124
1125

1126 Beyond the above, there is an enormous amount of data showing the toxicity in menstruation and
1127 pregnancy as follows:

1128
1129 One team of researchers performed a survey study of the impacts of vaccination on menstruation
1130 and were quickly deluged with 140,000 reports. [Published in Science](#), they found that 42% of
1131 women reported menstrual abnormalities related to the vaccine.

1132
1133 From this article by investigative reporter Sonia Elijah, she reports on data obtained from a
1134 Freedom of Information Act request for the EU's Periodic Safety Update Report #3 ([PSUR](#)
1135 [#3](#)), covering the 6-month period of 19 December 2021 through to 18 June 2022, which
1136 recently became available on the Austrian Politics and Science blog, [tkp](#). Here is an excerpt:

1137 [The pregnancy cases \(cumulative clinical trial data\)](#)

1138 The pregnancy cases arising from the cumulative clinical trial data in PSUR# 3, originated
1139 from Pfizer's phase 1/2/3 clinical trial through to June 2022. Even though pregnant women
1140 were excluded from Pfizer's pivotal trial, some of the female participants became pregnant.

1141 As part of the approval letter for the emergency use of COMIRNATY (marketing name for
1142 Pfizer-BioNTech mRNA vaccine), the World Health Organisation (WHO) requested that
1143 BioNTech, the marketing authorisation holder, monitor their outcomes.
1144 There were 697 pregnancy cumulative cases reported, which comprised of 597 mother cases
1145 and 100 baby/foetal cases. *‘431 cases reported exposure to vaccine in utero without the*
1146 *occurrence of any clinical event’* in the mother cases. The following is a breakdown of the
1147 166 mother cases which did report adverse clinical events. The numbers in brackets reflect
1148 the number of frequently reported events.

- 1149 • ~ 1/5 of all mother cases reported serious adverse events (139)
- 1150 • spontaneous abortions (46)
- 1151 • Pre-eclampsia (7)
- 1152 • Cephalo-pelvic disproportion (6)
- 1153 • Abortion missed, Foetal death, postpartum haemorrhage, premature separation of
1154 placenta (4 each)
- 1155 • Abortion threatened, ectopic pregnancy, gestational hypertension, premature
1156 delivery, premature labour (3 each)
- 1157 • Abortion incomplete, hyperemesis gravidarum, maternal exposure via partner during
1158 pregnancy, miscarriage of partner, uterine disorder (2 each)
- 1159 • COVID-19 (9)
- 1160 • Anaemia (2)

1161 From the list above, it’s note-worthy to point out that “maternal exposure via partner during
1162 pregnancy” and “miscarriage of partner” refers to cases of women being **indirectly exposed**
1163 **to BNT162b2 by their vaccinated partners**. This importantly relates to vaccine shedding,
1164 which we know from their clinical trial protocol that Pfizer’s was aware could happen.
1165 According to Pfizer’s own clinical trial protocol, cases of pregnant women who
1166 were **indirectly exposed** to the vaccine by their partners (who participated in the trial) were
1167 classified as ‘Exposure During Pregnancy’ and immediately reported to Pfizer Safety on the
1168 Vaccine Serious Adverse Event Form within 24 hours of the investigator’s awareness. The
1169 pregnancy was to be followed up by the investigator with Pfizer Safety being notified of the
1170 outcome.

1171 [The baby/foetal cases \(cumulative clinical trial data\)](#)

1172 What’s disturbing is that a staggering 98 out of the 100 baby/foetal cases were reported as
1173 serious. The screenshots below reflect their appalling outcomes.

- Hundred (100) baby/foetal cases, 98 serious and 2 non-serious. Cases are classified according to pregnancy outcome.
 - Pregnancy outcome: Live birth with congenital anomaly: Thirty-one (31) of these cases reported 39 congenital anomalies that were coded to the PTs Atrial septal defect (4), Ankyloglossia congenital, Hypoxic-ischaemic encephalopathy, Neonatal hypotension, Trisomy 21 (2 each), Cleft lip, Coma neonatal, Congenital rubella syndrome, Congenital skin dimples, Congenital skin disorder, Craniosynostosis, DiGeorge's syndrome, Gnathoschisis, Microcephaly, Neonatal pneumothorax, Neonatal intestinal perforation, Neonatal seizure, Nervous system disorder, Newborn persistent pulmonary hypertension, Osteochondrodysplasia, Patent ductus arteriosus,

Polydactyly, Pyelonephritis acute, Renal failure neonatal, Renal tubular necrosis, Sepsis neonatal, Sex chromosome abnormality, Syndactyly, Thanatophoric dwarfism, Thrombocytopenia neonatal, Ventricular septal defect, Vesicoureteric reflux (1 each).

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1175
1176

For the 68 baby/foetal cases showing 'live birth without congenital anomaly,' the serious adverse event outcomes can be read in the screenshot below.

- Pregnancy outcome: Live birth without congenital anomaly: **Sixty-eight (68) cases** reported live birth babies without congenital anomaly. Of these 68 cases, information regarding trimester of exposure was available in 40 cases. Of these 40 cases, in 23 cases, foetus was exposed during the 3rd trimester, in 14 cases foetus was exposed during the 2nd trimester, and in 3 cases exposure occurred during the 1st trimester. The frequently reported events (>1 occurrence) in these 68 cases were coded to PTs Jaundice neonatal (11), Foetal distress syndrome (8), Premature baby (6), Neonatal pneumonia, Neonatal respiratory distress, Bronchiolitis, Neonatal respiratory distress syndrome, Hyperbilirubinaemia neonatal (3 each), Foetal hypokinesia, Neonatal tachypnoea, Dehydration, Gastroenteritis, Patent ductus arteriosus, Anaemia neonatal, Sepsis neonatal, Hypoglycaemia neonatal, Meconium aspiration syndrome (2 each). In all these 68 cases, there was limited information regarding the mother's obstetric history, which precluded meaningful causality assessment.

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Table 69. Post-Authorisation Data: Pregnancy Outcome during the Reporting Interval^a

Pregnancy outcome	Prospective cases 1032 (28.3% of pregnancy cases)					Retrospective cases 866 (23.8% of pregnancy cases)				
	Timing of exposure in pregnancy					Timing of exposure in pregnancy				
	Before conception	1 st trimester	After 1 st trimester	During all pregnancy	Unknown	Before conception	1 st trimester	After 1 st trimester	During all pregnancy	Unknown
Ectopic pregnancy	0	1	0	0	0	0	1	0	0	1
Spontaneous abortion	0	14	1	0	25	0	149	13	0	281
Elective termination (foetal defects)	0	0	0	0	2	0	10	3	0	24
Elective termination (no foetal defects or unknown)	0	0	0	0	1	0	4	2	0	2
Stillbirth with foetal defects	0	0	0	0	0	0	4	7	0	15
Stillbirth without foetal defects	0	1	2	0	2	0	3	10	0	13
Live birth with congenital anomaly	0	14	2	0	10	0	5	10	0	11
Live birth without congenital anomaly	0	100	240	0	617	0	29	89	0	180
Total	0	130	245	0	657	0	205	134	0	527

a. 19 December 2021 through 18 June 2022.

1182
 1183 Significantly, a third of the pregnancy outcomes provided during the reporting period were
 1184 negative.
 1185 Spontaneous abortion: 483
 1186 Live birth with congenital abnormalities: 52
 1187 Still birth with foetal defects: 26
 1188 Elective termination (because of foetal defects): 39
 1189 Out of the 3642 pregnancy cases, 322 were classified as baby/foetal cases and 3320 were mother
 1190 cases.

1191 [The baby/fetal cases \(post-authorization data\)](#)

1192 90% of the 322 baby/fetal cases were classified as serious. There were 39 cases of ‘live birth
 1193 with congenital anomaly.’ The screenshots below, show the frightening range of those defects.

1194

- Three hundred twenty-two (322) baby/foetal cases, 283 serious and 39 non-serious. Cases are classified according to pregnancy outcome.
 - Pregnancy outcome: **Live birth with congenital anomaly:** Thirty-nine (39) of these cases reported 72 congenital anomalies that were coded to the PTs Foetal malformation (4), Atrial septal defect, Congenital anomaly, Ventricular septal defect (3 each), Congenital cystic lung, Congenital hydronephrosis, Congenital skin dimples, Exomphalos, Foetal cardiac disorder, Foetal chromosome abnormality, Foetal growth restriction, Kidney malformation, Pulmonary valve stenosis congenital (2 each), Anal atresia, Ankyloglossia congenital, Arnold-Chiari malformation, Cleft lip, Cleft palate, Cloacal exstrophy, Congenital amputation, Congenital foot malformation, Congenital haematological disorder, Congenital hand malformation, Congenital heart valve disorder, Congenital musculoskeletal disorder, Congenital musculoskeletal disorder of limbs, Congenital musculoskeletal disorder of spine, Congenital oral malformation, Cryptorchism, Double outlet right ventricle, Dysmorphism, Enlarged foetal cisterna magna, Fallot's tetralogy, Foetal arrhythmia, Foetal growth abnormality, Growth retardation, Heart disease congenital, Heart valve incompetence, Hepatic cytolysis,

Hypospadias, Meningomyelocele, Neonatal deafness, Neonatal infection, Polydactyly, Pulmonary artery stenosis congenital, Pulmonary sequestration, Renal aplasia, Renal disorder, Renal dysplasia, Renal failure, Renal fusion anomaly, Renal hypertrophy, Spina bifida, VACTERL syndrome (1 each). Of these 39 cases,

1195

1196 There were 37 cases of spontaneous abortion in the baby cases with reported events of 'Foetal
1197 growth restriction (18) congenital anomaly (8), Foetal heart rate abnormal (3), Cytogenetic
1198 abnormality Foetal vascular malperfusion (2 each).'

1199 In 4 cases the mother had an underlying medical history but for the remaining 33 cases, the
1200 report states, 'there was limited information regarding obstetric history or co-suspect medications
1201 of the mother, which precluded meaningful causality assessment.'

1202 There were 23 cases of reported elective termination of pregnancy. **22 out of the 23**
1203 **cases 'reported elective termination due to foetal defects.'** There were a further 21 cases of
1204 still births, with just over 70% of those cases reporting foetal defects.

1205 In stark contrast to the damning data, the report concludes: '**There were no safety signals**
1206 **regarding use in pregnant/lactation women that emerged from the review of these cases..'**

1207 Furthermore, throughout the 'Use in Pregnant/Lactating Women' section in PSUR #3, the
1208 following dismissive and recurring statement is made, ""There was limited information
1209 regarding mother's obstetric history, which precluded meaningful assessment."

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Beyond the European data, Thorpe et al recently published [a study](#) finding unprecedented signals of harm of the Covid-19 mRNA vaccines from the VAERS database using a CDC established method for detecting vaccine danger signals called “the proportional reporting ratio” (PRR). The CDC states that a **PRR of two or greater** is a safety signal “that requires further study.”

The two figures below show the PRR’s for eleven menstrual and pregnancy related outcomes. The first on the left calculates it by number of doses given and the second to the right by number of persons vaccinated. The magnitude of the PRR’s are unprecedented. Depending on comparator method, having “abnormal menses” ranges from an **RR of 298 to 4927 (i.e. well over the threshold of 2)**. With miscarriages, the PRR ranges from 15-57.

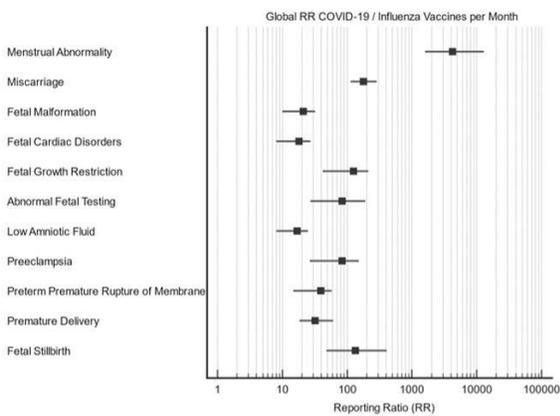


Figure 2. Global Reporting Ratios (RRs) for COVID-19 vs. Influenza Vaccination by Month.

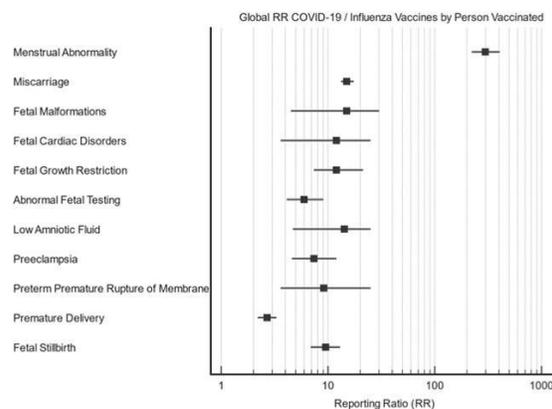


Figure 3. Global Reporting Ratios (RRs) for COVID-19 vs. Influenza Vaccination by Persons Vaccinated

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1223

Note the conclusion by this team of authors: “These results necessitate a worldwide moratorium on the use of COVID-19 vaccines in pregnancy.”

1226

1227

Evidence of Shedding via Breast Milk

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[This study](#) found that the vaccine mRNA was found in the milk of 1/10 women studied (4/40) in the first week after vaccination with mRNA vaccine (either after dose 1 or dose 2). Amounts can reach 2 ng/mL of milk.

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1232

1233

Although the authors did not think this represented a “significant” amount, in

1234

Banoun’s [masterful review paper](#) on shedding, she explains:

1235

1236

This amount may seem small compared to the 30 micrograms of mRNA injected with the vaccine, but it can be enough to produce a significant amount of spike. Indeed, an infant makes several feedings per day, for approximately 240 to 360 mL per day and a total over a week of 1680 to 2,520 mL in the first week. The newborn, weighing between 2 and 5 kg, could therefore be exposed to a dose of 5 µg of mRNA in its first week. This seems disproportionate compared to the 10 µg injected into children aged 5 to 11 years who weigh approximately 18 to 35 kg

1241

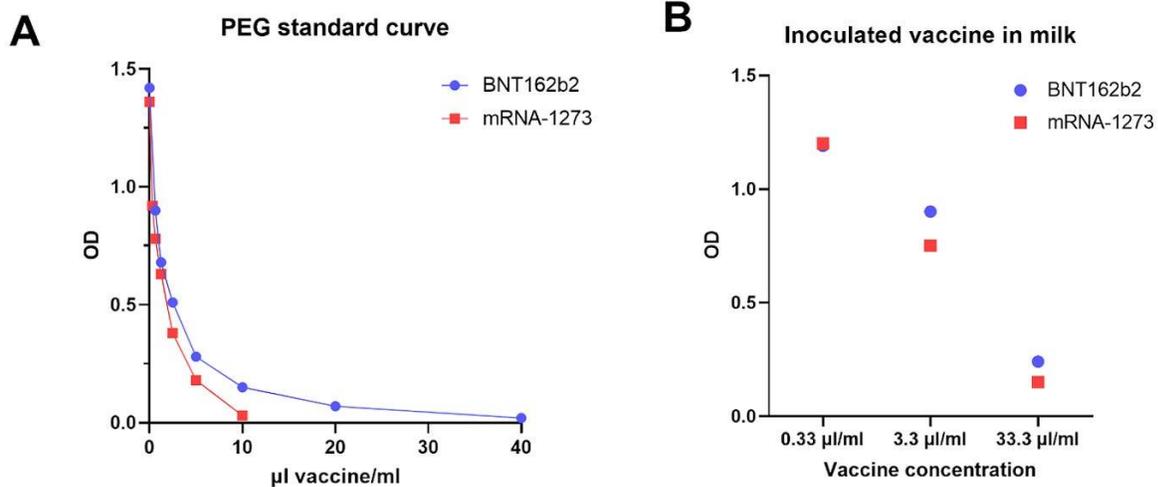
1242 respectively [39]. The method used in the latter study is more sensitive than that of Golan et al.
1243 who did not find mRNA in milk [40].

1244
1245 This [study in the Lancet](#) reported on the breast milk of 11 women who were vaccinated with
1246 mRNA within 6 months of delivery. They found trace amounts of mRNA in 7 samples from 5
1247 different participants at various times up to 48 hours post vaccination. The vaccine mRNA
1248 appeared in higher concentrations in the extracellular vesicles (i.e. exosomes/nanoparticles) than
1249 in whole milk. Their conclusion:
1250 “Our findings demonstrate that the COVID-19 vaccine mRNA is not confined to the injection
1251 site but spreads systemically and is packaged into breast milk extracellular vesicles.”

1252
1253 Another [study](#) found PEG (a component of the mRNA vaccine) as well as Covid vaccine mRNA
1254 in breast milk as shown below.

1255

Supplementary data:



1256
1257

1258 The authors write “Of note, PEGylated proteins concentration is higher in mRNA-1273
1259 compared to BNT-162b2 **which also stand in line with mRNA concentration** in each vaccine
1260 (ready for administration vaccines were used).” So, a dose-response relationship was found
1261 which is particularly damning - the more you give, the more you find in breast milk).

1262
1263 So, we know mRNA can be transmitted (shed) to breastfed babies in breast milk. I used to
1264 dismiss the importance of this finding by reasoning that the stomach acid of the baby would
1265 destroy the mRNA it and render it inert. But then I found these papers ([here](#), [here](#), and [here](#)),
1266 which stated:

1267
1268 *It has been known for some years that mRNA encapsulated in extracellular vesicles is protected*
1269 *from gastric juices and can transfect intestinal cells. A recent review by Melnik and Schmitz*
1270 *confirms that milk EVs survive the extreme conditions of the gastrointestinal tract, are*

1271 *internalized by endocytosis, are bioavailable, reach the bloodstream, and penetrate peripheral*
1272 *tissue cells. Beyond integration into the genome, other concerns should arise such as provoking*
1273 *an “immunogenic” reaction to mRNA.*

1274

1275 Clinical evidence suggesting that the mRNA and/or spike in breast milk can survive in the
1276 stomach and cause illness in the baby lies in the below list from an [eight-page confidential](#)
1277 [document](#) of reports made to Pfizer by lactating women who were vaccinated. Pfizer was aware
1278 of and tracking adverse events in babies “exposed” to the mother’s vaccination via breast milk.
1279 Pfizer observed what was graded as non-severe adverse events (AEs) in a whopping 20% of the
1280 215 lactating women reporting “exposure” to the vaccine.

1281

1282 The report also documents 10 *serious* AEs, including facial paralysis (not listed under “serious”
1283 interestingly), lymphadenopathy (swelling of lymph nodes that could be associated with cancer),
1284 and blurred vision. Note these are all side effects of the vaccines reported by adults. Among
1285 infants, reports included skin exfoliation, rashes, swollen skin, and unspecified sickness. That is
1286 a very high percentage of serious AEs in babies for any therapy.

1287

Table 2. Number of Adverse Events Reported in Infants with ‘Exposure via Lactation’

Preferred Term	Number of Events
Rhinorrhoea	1
Roseola	1
Skin exfoliation	1
Vision blurred	1

There were 10 SAEs reporting with the PT Exposure via lactation. Six of these SAEs were reported in infants.

- A 15-month old infant with medical history of vomiting experienced skin exfoliation and infant irritability while being breastfed (latency <7 days). The outcome of the event ‘skin exfoliation’ was not recovered and outcome of event ‘infant irritability’ was unknown. No causality was reported by the physician.
- A 9-month old infant with a medical history of meningococcal vaccine and no history of allergies, asthma, eczema or anaphylaxis experienced rash and urticaria a day after exposure via lactation. The outcome of the events was ‘resolved’ and event did not happen after the second day. No causality assessment was provided.
- A day after the mother received vaccination, a baby developed a rash after breastfeeding. At the time of the report, the event was ‘not recovered’. A causality assessment was not provided.
- An 8-month old infant experienced angioedema one day after his mother received vaccination. The event was considered non-serious by health authority and the outcome at the time of the report was unknown. No causality was provided.
- There were 2 cases reporting ‘illness’ after exposure via breast milk’. In the first case, a 6-month old infant developed an unspecified sickness 2 days post mother’s vaccination. The outcome of the event sickness was recovered, and no causality assessment was provided. The second case, a 3-month old infant developed an unspecified illness and required hospitalization for 6 days post exposure via breast milk (>7 days latency). The event outcome was reported as ‘recovering’ and no causality assessment was provided.

1288

1289 Again from the article by investigative reporter Sonia Elijah, she reports on data obtained from a
1290 Freedom of Information Act request for the EU’s Periodic Safety Update Report #3 ([PSUR #3](#)),
1291 covering the 6-month period of 19 December 2021 through to 18 June 2022, which recently
1292 became available on the Austrian Politics and Science blog, [tkp](#). She discovered that
1293 Pfizer **documented numerous cases of strokes, convulsions, and respiratory failure among**
1294 **nursing babies.**

1295

16.3.3.1.16. Respiratory AESIs

Search criteria - HLTs (All Path) Lower respiratory tract infections NEC; Respiratory failures (excl neonatal); Viral lower respiratory tract infections OR PTs Acute respiratory distress syndrome; Endotracheal intubation; Hypoxia; Respiratory disorder.

Upon review, 4 cases were determined to be non-contributory and were not included in the discussion since these cases involved exposures to the vaccine during the mother's pregnancy or through breastfeeding.⁹⁹

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1301

It is important to note that upon further review of PSUR #1, something extremely disturbing surfaced – adverse events were reported for breast-fed babies, indirectly exposed to the Pfizer-BioNTech mRNA shot, by their vaccinated mothers. The screenshot below is taken from page 165 of PSUR #1.

16.3.3.1.16. Stroke

- Search Criteria: HLT Central nervous system haemorrhages and cerebrovascular accidents; Cerebrovascular venous and sinus thrombosis (Primary Path).
 - Upon review, 2 PM cases were determined to be non-contributory and are not included in the discussion since these 2 cases involved babies who were indirectly exposed to BNT162b2 (trans-mammary route).

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The fact that 2 cases from the post-marketing (PM) data involved babies who were indirectly exposed to the Pfizer-BioNTech mRNA vaccine (BNT162b2) **via the trans-mammary route** (through the breast milk) and consequently suffered a **stroke** (central nervous system haemorrhages and cerebrovascular accidents), is shocking.

1307

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1309

Then, on page 149 (screenshot below), 3 more cases of babies suffering from neurological adverse events, for example, convulsions, from being indirectly exposed to the vaccine via their vaccinated mothers' breast milk, were recorded.

16.3.3.1.10. Neurological AESIs (including demyelination)

- Search Criteria: SMQ Convulsions (Narrow and Broad) OR SMQ Demyelination (Narrow and Broad) OR PTs Ataxia; Cataplexy; Encephalopathy; Fibromyalgia; Intracranial pressure increased; Meningitis; Meningitis aseptic; Neuropathy peripheral; Polyneuropathy.

- Upon review, 3 PM cases were determined to be non-contributory and are not included in the discussion since these 3 cases involved babies who were indirectly exposed to BNT162b2 (trans-mammary route).

1310

1311 From the analysis of booster doses (> 2 dose primary series), a staggering 455 cases were
1312 recorded during the 6-month reporting interval (1 from the clinical trial data and 454 recorded
1313 from the post-marketing data) involved babies whose cases “**were excluded due to**
1314 **indirect exposure (transplacental/transmammary) to BNT162b2**” as below:

Analysis of Booster Doses

Search criteria: Dose number equal to 3 or Dose number equal to 4 OR Dose Description containing the word "BOOSTER" OR LLT equal to BOOSTER.

The search yielded 119,601 cases (491 CT cases and 119,110 PM cases).

Upon review,

- 455 cases (1 CT and 454 PM) involving babies were excluded due to indirect exposure (transplacental/transmammary) to BNT162b2.

1315

1316 A further example, shown in the screenshot below taken from page 239, reports 4 cases (babies)
1317 suffering from respiratory adverse events of special interest (AESI), which were “determined to
1318 be non-contributory and were not included in the discussion since these cases
1319 involved **exposures to the vaccine during the mother’s pregnancy or through**
1320 **breastfeeding.**”

16.3.3.1.16. Respiratory AESIs

Search criteria - HLTs (All Path) Lower respiratory tract infections NEC; Respiratory failures (excl neonatal); Viral lower respiratory tract infections OR PTs Acute respiratory distress syndrome; Endotracheal intubation; Hypoxia; Respiratory disorder.

Upon review, 4 cases were determined to be non-contributory and were not included in the discussion since these cases involved exposures to the vaccine during the mother’s pregnancy or through breastfeeding.⁹⁹

1321

1322 In both PSUR reports the same reason is given by Pfizer/BioNTech for why these cases “are not
1323 included in the discussion” because they “**were determined to be non-contributory**” since they
1324 involved babies “**who were indirectly exposed to BNT162b2.**”

1325 This is clearly an admission that babies can be “indirectly exposed”, i.e evidence that shedding
1326 between mother and baby occurs.

1327 Given the gravity of this important safety signal affecting nursing babies, to brush over the fact
1328 that these infants’ adverse event cases were non-contributory because they were indirectly
1329 exposed to the vaccine via breast milk is unconscionable.

1330
1331 More evidence: A [study](#) published a year ago in JAMA revealed that 3.5% of women reported a
1332 decrease in breast milk supply and **1.2% reported “issues with their breastmilk-fed infant**
1333 **after vaccination.”** Here is one vivid [VAERS entry](#) which could represent spike or the LNP in
1334 breast milk:

1335

VAERS ID: 1124474

AGE: 1 | SEX: M | STATE: (United States)

Description

MOTHER OF 12 MONTH OLD BOY RECEIVED
FIRST DOSE OF COVID 19 VACCINE AT 9:15 AM
SHE BREASTFED HER 12 MONTH OLD SON 3
HOURS LATER AND WHILE BREASTFEEDING
THE CHILD DEVELOPED ACUTE
ANAPHYLAXIS. TO BE CLEAR: MOTHER HAD
THE VACCINE AND THE CHILD HAD THE
REACTION

1336
1337

1338 Elijah did a more recent [investigative report](#) on Pfizer’s Pregnancy and Lactation [Review](#) which
1339 had just been released in April per court-order by the FDA, 2 years after it was signed off, and
1340 she again found reports of similar damning adverse events, such as spontaneous abortions and
1341 preterm delivery of foetuses after **exposure to the vaccine trans-placentally or trans-**
1342 **mammary** (through the breast milk) after their mothers were vaccinated. Adverse events such as
1343 facial paralysis and lymphadenopathy were also reported in infants, indirectly exposed through
1344 the breast milk of their vaccinated mothers.

1345 Again from the [paper](#) published in the *Journal of American Physicians and Surgeons* by Thorp et
1346 al., they discovered an astonishing volume of global adverse event counts for COVID-19
1347 vaccines reported over 18 months, *compared to 282 months for influenza vaccines*, (see
1348 screenshot of Table 1 below).

1349

Table 1. Global Adverse Events (AEs): COVID Vaccines; Influenza Vaccines

Adverse Event (AE)	AE Count (COVID; influenza)	AE/month (COVID; influenza)	AE/billion doses (COVID; influenza)	AE/billion persons (COVID; influenza)
Menstrual abnormality	12,843; 65	714; 0.221	1,060; 0.985	2460; 8.43
Miscarriage	3,338; 325	185; 1.11	277; 4.92	638; 42.2
Chromosomal Abnormalities	10; 0	0.556; 0.00	0.829; 0.00	1.91; 0.00
Malformation	22; 2	1.22; 0.0068	1.82; 0.0303	4.21; 0.259
Cystic Hygroma	8; 0	0.444; 0.00	0.663; 0.00	1.53; 0.00
Fetal Cardiac Disorders	18; 2	1.00; 0.0068	1.49; 0.0303	3.44; 0.259
Fetal Arrhythmia	5; 0	0.278; 0.00	0.414; 0.00	0.956; 0.00
Fetal Cardiac Arrest	20; 0	1.11; 0.00	1.66; 0.00	3.82; 0.00
Malperfusion	12; 0	0.667; 0.00	0.994; 0.00	2.29; 0.00
Growth Anomaly	188; 24	10.4; 0.0816	15.6; 0.364	35.9; 3.11
Abnormal Fetal Surveillance	178; 45	9.89; 0.153	14.7; 0.682	34.0; 5.84
Placental Thrombosis	6; 0	0.333; 0.00	0.497; 0.00	1.15; 0.00
Stillbirth	402; 62	22.3; 0.218	33.3; 0.970	76.9; 8.3
Low amniotic fluid	17; 1	0.944; 0.00340	1.41; 0.0152	3.25; 0.130
Preeclampsia	133; 28	7.39; 0.0952	11.0; 0.424	25.4; 3.63
Preterm Delivery	384; 212	21.3; 0.721	31.8; 3.21	73.4; 27.5
PPROM	45; 9	2.50; 0.0306	3.73; 0.136	8.60; 1.17
Premature Baby Death	10; 0	0.556; 0.00	0.829; 0.00	1.91; 0.00

1351 Lastly, via personal communication with the Principal Investigator Dr. Sue Peters, a study was
1352 performed where a group of unvaccinated women were exposed to recently vaccinated women
1353 and the authors have disclosed to me that 70% of women developed menstrual irregularities
1354 subsequent to the exposure. For more details on the study, I refer you to Dr. Peters at
1355 sp@suepeters.com. I believe her study, along with all the above data, would most definitively
1356 support the scientific and clinical accuracy of the comments on shedding made by Dr. Hoffe.

1357 1358 **Conclusion**

1359
1360 In light of all the evidence I have presented on the science and impacts of shedding, I believe that
1361 much of Dr. Corneil's professed expert opinion should be called into question when he makes such
1362 easily disprovable assertions so emphatically. For instance, he wrote:

1363
1364 *" there is no biological mechanism for viral shedding or release of any vaccine component to*
1365 *occur with these vaccines. "*

1366
1367 From the above highly referenced series of papers, this statement is 100% false. Further, his
1368 characterization of Dr. Hoffe's statement on shedding risks as being inaccurate and in violation
1369 of both the Prudence and Harm Prevention standards is driven by demonstrable and
1370 unconscionable ignorance of the topic.

1371
1372 Another statement of Dr. Corneil's regarded Pfizer's clinical trial protocol as follows:

1373
1374 *"There was significant media interest in, mischaracterization and misrepresentation of the Pfizer*
1375 *Comirnaty clinical trial protocol which included on pages 67 and 68, a standard exclusion*
1376 *criterion involving female study participants found to be pregnant while being exposed to or*
1377 *having been exposed to virus or an attenuated virus following inhalation or skin exposure*¹⁸².
1378 ***This criterion is not relevant to non-viral based vaccines including mRNA COVID-19 vaccines***
1379 ***and does not speak to or corroborate COVID-19 viral shedding or shedding of any other***
1380 ***component of the Pfizer Comirnaty COVID-19 mRNA vaccine.***

1381
1382 I instead will argue that the exclusion criteria was appropriate and consistent with those of a gene
1383 based therapy.

1384
1385 From the evidence I have presented, it is clear that shedding phenomenon is real and has adverse
1386 impacts in not only breastfed babies but most convincingly on menstruation as accurately
1387 discussed by Dr. Hoffe. Shedding is real. Pfizer knew shedding was real, and the section of the
1388 protocol with such "shedding exposures" as exclusions is perfectly in line with precautions taken
1389 around gene-based nanoparticle technology.

1390
1391 Again, [Pfizer knew that shedding was a possibility](#) given that they specifically excluded people
1392 "exposed" to the vaccine via inhalation (not subtle) or skin contact. Starting on p. 67 of the
1393 protocol the investigator is **instructed to report** various "environmental exposures."

1394
1395 1)A male participant who is receiving or has discontinued study intervention exposes a female
partner prior to or around the time of conception."

1396 2) "A female family member or healthcare provider reports that she is pregnant after having been
1397 exposed to the study intervention by inhalation or skin contact."

1398 3) "A male family member or healthcare provider who has been exposed to the study
1399 intervention by inhalation or skin contact then exposes his female partner prior to or around the
1400 time of conception."

1401 4) "A female is found to be breastfeeding while being exposed or having been exposed to study
1402 intervention (ie, environmental exposure). An example of environmental exposure during
1403 breastfeeding is a female family member or healthcare provider who reports that she is
1404 breastfeeding after having been exposed to the study intervention by inhalation or skin contact."
1405

1406 From this expert review of shedding of mRNA vaccines which has been peer-reviewed and
1407 published, the author's interpretation of these exclusion criteria directly contradicts Dr. Corneil
1408 as follows:

1409

1410 *The protocol for the Pfizer Phase I/II/III trial of COVID-19 mRNA vaccines (which began in*
1411 *May 2020) mentions the possibility of passage of the study product through inhalation or skin*
1412 *contact and passage through semen from a man exposed through inhalation or skin contact and*
1413 *passage through breast milk; the possibility of an adverse vaccine reaction from these exposures*
1414 *is also mentioned [15]. Pfizer's data clearly indicate that a pregnant woman may be exposed to*
1415 *"the intervention studied due to environmental exposure."*

1416

1417 *Environmental exposure can occur through "inhalation or skin contact." Examples of*
1418 *environmental exposure during pregnancy include: A female family member or health care*
1419 *provider reports that she is pregnant after being exposed to the study intervention through*
1420 *inhalation or skin contact. A male family member or health care provider who was exposed to*
1421 *the study intervention by inhalation or skin contact subsequently exposes his female partner*
1422 *before or around the time of conception.*

1423

1424 The author further interprets the section as follows:

1425 *This clearly means that any contact, including sexual contact with someone who has received the*
1426 *vaccines, exposes those who have not received the vaccines to the "intervention", i.e. mRNA.*

1427 *Exposure during breastfeeding had also to be immediately notified during the trial: it is assumed*
1428 *that the investigator is concerned that a breastfeeding mother could transmit the experimental*
1429 *mRNA to her baby if she received the vaccines directly or if she is "exposed to the study*
1430 *intervention by inhalation or skin contact."*

1431 I understand in some small way as to how Dr. Corneil's misinterpretation occurred. I believe it is
1432 partly due to the fact that the protocol was written in what I maintain was a deliberately obfuscating
1433 way (i.e. they purposely use the word "exposed" in two different connotations, such as in exclusion
1434 #4 where they describe receiving the intervention (i.e. the vaccine) as having been "exposed" to it,
1435 but then they also use exposed in the context of "environmental exposure."

1436

1437 Finally, I am seriously troubled by the fact that Dr. Corneil, either willfully or through ignorance
1438 would so erroneously accuse Dr. Hoffe of violating both Prudence and Harm Prevention standards
1439 with such easily disprovable data and arguments. I have provided extensive evidence which
1440 directly contradicts Dr. Corneil's opinion on Dr. Hoffe's statements on ivermectin's efficacy in

1441 prevention and treatment of Covid as well as Dr. Corneil's opinion on Dr. Hoffe's statements on
1442 shedding. It is my opinion that Dr. Corneil's numerous false accusations that Dr. Hoffe violated
1443 practice standards threatens the livelihood of Dr. Hoffe by restricting or revoking his license to
1444 practice medicine. It is my belief that such behavior violates the *CMA Code of Ethics and*
1445 *Professionalism* and thus I encourage the College to investigate Dr. Corneil for his damaging
1446 behavior to a colleague.

1447
1448 Name: Pierre Kory, MD, MPA

1449
1450 Signature 

1451
1452 January 10, 2024

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