

Here are some facts about the completion of my PhD degree at UOW:

1. When I completed this degree, Professor Heather Yeatman was the head of the School of Public Health (as she still is today) and I asked to continue my public health research with a PhD investigating the government's vaccination program in the School of Public Health.
2. Professor Heather Yeatman informed me that I would have to do this research in the School of Social Sciences because the control of infectious diseases is a political topic.
3. The control of infectious diseases is described as social medicine. Infectious diseases were controlled in the early 20th century by economic and political decisions regarding the installation of public health infrastructure to change environmental and lifestyle characteristics. These factors are determinants in the outbreaks of infectious diseases in communities. In 2014 the UOW moved the School of Public Health into the Faculty of Social Sciences where it is today.
4. Peter McIntyre has attempted to denigrate my research and teaching in the Environmental Science Department at Murdoch University (2008-2010) by associating my work with events that happened to Dr. Peter Dingle. These events were irrelevant to my PhD research that was carried out from 2011-2015 at the University of Wollongong. This was supervised by Emeritus Professor Brian Martin.
5. I am not made aware of any academics in my field of research who complained to Peter McIntyre about 'inadequate supervision' or 'poor practices around research evidence'. Please request that he provide you with any evidence for this claim.
6. In 2009 I sent a summary of my whooping cough vaccine research to the Public Health Association of Australia (PHAA) for publication in their newsletter. The PHAA drafted Peter McIntyre to write a response to my article and both were published (side-by-side) in the PHAA newsletter April 2009. My article was fully referenced. However, this PHAA newsletter does not require references and Peter McIntyre did not provide me with a fully referenced copy of the claims he made in his response article. To date I have not seen references that support his claims that were published in 2009. This is important because any references used to support his claims that are published *after* 2009 can be designed from an apriori position.
7. At this time (2009) Peter McIntyre asked me to attend the NCIRS to present my research. He said he would ask his secretary to make a time and date for this to occur.



However, I did not receive any notification of a date or time from his secretary. This was witnessed by academics at Murdoch University. Please ask him to provide evidence that I turned down this opportunity as I was grateful to receive such an invitation but he never provided me with a date or time for this to occur.

8. Please also ask him for the evidence that 'JW was not willing to take part in any objective scrutiny of the evidence.' My PhD thesis describing the evidence I have presented is published on the UOW repository with open access for this purpose. In contrast Professor Peter McIntyre did not give permission for his 1994 PhD on the HIB vaccine to be published in open access in the University of Sydney repository when I requested this in July 2016 (Appendix 1). Peter McIntyre's PhD thesis is only accessible to students who request the thesis via document delivery and not to the general community for open scrutiny of the science.
9. Further Peter McIntyre, along with ~45 other government and public health officials, declined to attend a public forum at the University of Technology, Sydney in October 2015 to debate the science in the government's vaccination policies. This evidence supports the conclusion that it is Peter McIntyre who is not willing to take part in objective scrutiny of the science.
10. Peter McIntyre admits in his affidavit to being the author of a letter presented by the lobby group, the Friends of Science in Medicine, to the University of Wollongong that requested the removal of my PhD in January 2016. This letter questioned the quality and validity of acceptance of my PhD by UOW. This was done in January 2016 - one week after my thesis was published on the UOW website and this did not allow time for these activists to have read or debated the scientific arguments in my PhD thesis. Please note that Peter McIntyre's request to remove the PhD failed because all the correct procedures were followed for the assessment of my PhD and because the scientific arguments I have presented are supported by academics at both national and international universities.
11. PM's claim in his affidavit that my expertise is confined to 'consideration ...of deficiencies about how policy is made' is false. Not only does Peter McIntyre agree that there are deficiencies in this area but he makes false assertions about the focus of my investigation into vaccination policies. My PhD investigates the undone science in government vaccination policies and not a 'presentation of pre-conceived notions with selective citation of references' as Peter McIntyre has inaccurately claimed.

12. As described in my affidavit presented in this case, it is the government that is using selective references to support the use of vaccines in mandatory and coercive vaccination policies. Peter McIntyre's claims about my research are made by ignoring the evidence and arguments that myself and many others are presenting.
13. The reference in PM's affidavit to Wikipedia and to the UOW website to claim that these official channels are disputing my scientific arguments is deceptive and inaccurate. This is because powerful industry lobby groups have influence in these official channels for disseminating knowledge. These channels are being misused to educate the public using false and misleading claims about vaccines. This practice is known as agnotology and it is the promotion of cultural ignorance due to the propagation of unsupported claims about vaccines. The evidence for this is provided in my PhD thesis in Chapters 8 and 6.
14. An example of the agnotology that is occurring in the promotion of vaccines is the way in which the University of Wollongong logo is being used to promote the Australian government's claims about vaccines. This promotion of the government's immunisation program was put up one week after my PhD thesis was published on the university website in January 2016. This promotion by UOW Professor Heather Yeatman, the head of the School of Public Health, is titled 'Experts unite behind evidence supporting immunisation' and she was permitted to promote the government's claims of the safety and efficacy of vaccines, even though neither she nor the ~ 60 UOW academics who have signed their names to this promotion, have ever researched vaccination science in-depth or read and debated my PhD thesis. This promotion of vaccination policies on the UOW website is deceiving the public about the safety and efficacy of vaccines because these UOW academics are not experts on vaccination science or policy and they have never investigated the government's claims about vaccines in any published research on this topic. Professor Heather Yeatman's area of expertise is nutrition and this does not entitle her to speak on the topic of vaccine safety and efficacy because this is outside her area of expertise.
15. In 2014 a leader of the Australian Skeptics/SAVN lobby group, Dr. John Cunningham, fabricated allegations of academic misconduct about my whooping cough research (completed in 2006) and submitted an anonymous complaint to the UOW about my research. This complaint was investigated by the University of Wollongong by breaching the university's own complaint procedures. The complaint was investigated even though Dr. John Cunningham did not provide any evidence of

academic misconduct. The UOW apologised to me for the misuse of their complaint procedures (Appendix 2) and provided me with financial compensation for the false information that was provided in the mainstream media by 'anonymous medical experts'. This was provided to the media before the confidential investigation by UOW was completed.

16. Peter McIntyre has conflicts of interest in government vaccination programs due to his role as the deputy/director of the government NCIRS for 20 years from 1998 – 2017. This role involves his participation in industry-funded safety and efficacy trials of vaccines with research grants provided by GlaxoSmithKline, Merck, and Pfizer. These financial conflicts of interest for Peter McIntyre are listed in the latest Australian Technical Advisory Group on Immunisation (ATAGI) conflict of interest statement (Appendix 3). During his 20 years at the NCIRS he has been influential in recommending vaccines for the national immunisation program (NIP). There is no independent body providing over-sight of the industry-funded science that is being used to recommend vaccines to the NIP and whilst he has retired as director of the NCIRS this year he is still listed as a member of the NCIRS advisory board and the scientific advisory committee in 2018.
17. The NCIRS works with the industry-funded Immunisation Coalition and there is no transparency or accountability in the science used for recommendations to the government vaccination program. Here is an example of the industry-funding of vaccination trials from 2012: Professor Peter McIntyre's National Centre for Immunisation Research and Surveillance (NCIRS) project for the study of pertussis vaccines for newborns was granted \$1.5 million of which more than \$750,000 in kind was provided by GSK for monovalent vaccine and laboratory testing.

The information above outlines the false and misleading information that Peter McIntyre has provided in his sworn affidavit about my university research and qualifications. His media comments are also associated with the violation of Section 121 of the Family Law Act which involved leaking my affidavit to the media. This has been done for the sole purpose of influencing public opinion on my scientific research with inaccurate information and framing of the issues. It is for these reasons that I recommend that his affidavit that has been submitted out of time is deemed ineligible for the [REDACTED] court proceedings.



# APPENDIX 1

You replied on 7/14/2016 9:07 AM.

From:

To:

Cc:

Subject:

FW: thesis questions - Professor Peter McIntyre government NCIRS

Sent: Thu 7/14/2016 4:38 AM

Dear Judy,

The University Library can only comment on the process for seeking permission to make a thesis available open access via our institutional repository.

We have contacted the author seeking permission to make the thesis open access via our institutional repository. We have not yet had a reply. Until we hear from the author, we will not make the digital copy of the thesis open access.

As mentioned, the thesis is accessible to the public. The hard copy of the thesis is still accessible to the public to read on site at the Fisher Library. A digital copy of the thesis is also available to any member of the public via our Document Delivery Service.

Kind regards,

## APPENDIX 2 :

UNIVERSITY OF  
WOLLONGONG  
AUSTRALIA



20 May 2015

Ms Judy Wilyman  
149 Calais Road  
WEMBLEY DOWNS WA 6019

Dear Ms Wilyman,

I have now received and read the report prepared by Associate Professor Samantha Hardy, Student Ombudsman, in relation to her review of the process involved in your academic misconduct investigation.

I agree with her finding that, in the specific circumstances of this case, a formal investigation was not warranted and did not serve anyone's interests.

We recognise and acknowledge that this has been a very stressful time for you, and I would like to personally say I am sincerely sorry for this to have happened.

While, usually, the outcome of a Student Conduct Committee hearing is confidential, given the fact that the stage 1 finding was disclosed and published in the media, I am prepared to waive the confidentiality for this final stage in case you wish to state publicly that the investigation by the Student Conduct Committee resulted in a finding that you did not engage in academic misconduct.

I have notified the complainant that you have been found not guilty of academic misconduct. I have also made it clear to the complainant that the appropriate forum for an academic debate about the quality and presentation of a researcher's data and the strengths of their arguments is one that takes place in the public eye. University academic misconduct processes are not a forum for academic debate.

I have also ensured that all those involved in the investigation have received a copy of the Student Ombudsman's report. Please be assured that we will be reviewing the policy and procedures in relation to academic conduct investigations in light of what we have learned from this experience.

Yours sincerely,

Professor Judy Raper  
Deputy Vice-Chancellor (Research and Innovation)

Professor Judy Raper  
Deputy Vice-Chancellor (Research and Innovation)

## Appendix 3

### Australian Technical Advisory Group on Immunisation

#### **Conflict of Interest**

The Australian Technical Advisory Group on Immunisation (ATAGI) has established processes to identify and manage conflicts of interest declared by its members, refer to the Conflict of Interest Procedures. A *Disclosure of Potential Conflicts of Interest (CoIs)* form is completed by each member of ATAGI or its Working Parties prior to their appointment on ATAGI / Working Parties. At all subsequent meetings, ATAGI / Working Party members are asked if there are further updates required to their disclosure form. Table 1 provides a summary of all disclosures for ATAGI members.

People with certain vaccine related interests at the time they apply for ATAGI membership are not considered for membership of ATAGI. For example, direct employment of a candidate or an immediate family member by a vaccine manufacturer holding a patent on a vaccine or related product, or serving on a Board of Directors of a vaccine manufacturer, excludes people from ATAGI membership.

However, because ATAGI members are experts in the vaccine field, they may be involved in vaccine studies. Therefore ATAGI members who lead vaccine studies at their respective institutions may become ATAGI members but they must abstain from voting on recommendations related to the vaccine they are studying. In addition, they cannot vote on any other vaccines manufactured by the company funding the research or on any vaccines that are similar to the one(s) they are studying.

A number of members have both academic and clinical interests in vaccine research including people who publish and lecture in the field. After review of all forms, no members of ATAGI were conflicted such that they were either precluded from being a member of ATAGI or were required to abstain from comment or leave the room when any specific clinical question/recommendation was being discussed. CoIs are only considered for the previous 5 years.

#### **Summary of disclosures from ATAGI members**

| <b>Member</b>                               | <b>Part a –<br/>Relevant<br/>financial<br/>activities</b> | <b>Part b -<br/>Relevant professional<br/>experience</b>                                                                                                                                            | <b>Part c -<br/>Other<br/>relationship or<br/>activities</b> |
|---------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| Professor Ross<br>Andrews (Chair)           | Nil                                                       | Nil                                                                                                                                                                                                 | Nil                                                          |
| Associate<br>Professor<br>Christopher Blyth | Nil                                                       | Investigator on a<br>pneumonia/meningitis study in<br>Papua New Guinea. Grant<br>received by employer (The<br>University of Western Australia)<br>from Pfizer.                                      | Nil                                                          |
| Professor Allen<br>Cheng                    | Nil                                                       | Site Investigator for a number of<br>infectious disease studies. Alfred<br>Health received payment from<br>Merck, GSK, Biocryst, George<br>Clinical and Gilead.<br>Chief Investigator for Influenza | Nil                                                          |

| Member                             | Part a –<br>Relevant<br>financial<br>activities | Part b -<br>Relevant professional<br>experience                                                                                                                                                                                                                            | Part c -<br>Other<br>relationship or<br>activities   |
|------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
|                                    |                                                 | surveillance (FluCAN surveillance system). Therapeutic Good Association Advisory Committee on Infectious disease and Biostatistics.                                                                                                                                        |                                                      |
| Dr Nigel Crawford                  | Nil                                             | Investigator on a number of epidemiological surveillance research and vaccine safety research. Funds received by employer (Murdoch Childrens Research Institute (MCRI).) (Pfizer)<br><br>Director of the Influenza Specialist Group (ISG). Resigned 23/2/2015. No payment. | Nil                                                  |
| Associate Professor Michelle Giles | Nil                                             | Travel, accommodation and registration paid by Pfizer to attend a vaccine conference.<br><br>Investigator on an antenatal pertussis study examining consumer and healthcare knowledge and attitudes. Grants received by employer Monash University.                        | Nil                                                  |
| Ms Madeline Hall                   | Nil                                             | Nil                                                                                                                                                                                                                                                                        | Nil                                                  |
| Associate Professor Noel Hayman    | Nil                                             | Chief Investigator into Hepatitis B and pneumococcal mediated otitis media in Australian Indigenous children. National Health and Medical Research Council grant provided to The University of Southern Queensland.                                                        | Nil                                                  |
| Professor David Isaacs             | Nil                                             | Nil                                                                                                                                                                                                                                                                        | Publication associated with Meningococcal B Vaccine. |
| Associate Professor Helen Marshall | Nil                                             | Investigator on a number of clinical trials including investigational vaccines. Research grants received by employer (The University of Adelaide) from GSK, Merck, Novartis, Pfizer, and Sanofi.<br><br>Member of Pertussis Advisory                                       | Nil                                                  |

| <b>Member</b>                      | <b>Part a –<br/>Relevant<br/>financial<br/>activities</b> | <b>Part b -<br/>Relevant professional<br/>experience</b>                                                                                                                                                                                                                                                                                                                                                                 | <b>Part c -<br/>Other<br/>relationship or<br/>activities</b> |
|------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
|                                    |                                                           | Board, GSK. No payment.<br><br>Travel support to attend symposia to present scientific data, sponsored by vaccine companies.                                                                                                                                                                                                                                                                                             |                                                              |
| Associate Professor Jodie McVernon | Nil                                                       | Investigator on a number of clinical trials. Grants received by employer (University of Melbourne) from bioCSL, GSK, Novartis, Pfizer.<br><br>Received funding from the Australian Research Council for vaccine clinical trial investigations.<br><br>Director of the Influenza Specialist Group (ISG). No payment.<br><br>Travel covered to attend a number of workshops and symposiums sponsored by vaccine companies. | Publication associated with Meningococcal B Vaccine.         |
| Ms Debra Petrys                    | Nil                                                       | Nil                                                                                                                                                                                                                                                                                                                                                                                                                      | Nil                                                          |
| Dr Nicholas Silberstein            | Nil                                                       | Nil                                                                                                                                                                                                                                                                                                                                                                                                                      | Nil                                                          |

| <b>Ex- Officio<br/>Member</b> | <b>Part a –<br/>Relevant<br/>financial<br/>activities</b> | <b>Part b -<br/>Relevant professional<br/>experience</b> | <b>Part c -<br/>Other<br/>relationship or<br/>activities</b> |
|-------------------------------|-----------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------|
| Dr Masha Somi                 | Nil                                                       | Nil                                                      | Nil                                                          |
| Dr Sonya Bennett              | Nil                                                       | Nil                                                      | Nil                                                          |
| Dr Ting Lu                    | Nil                                                       | Nil                                                      | Nil                                                          |

| <b>Ex- Officio Member</b> | <b>Part a – Relevant financial activities</b> | <b>Part b - Relevant professional experience</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Part c - Other relationship or activities</b> |
|---------------------------|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Professor Peter McIntyre  | Nil                                           | <p>Director of National Centre for Immunisation Research and Surveillance which receives core funding from the Department of Health, Health Protection NSW, the Sydney Children's Hospitals Network and the University of Sydney.</p> <p>Investigator on a number of publicly funded research grants. These include grants from National Health and Medical Research Council, Australian Research Council, the Foundation for Children, and the Public Health Research Network.</p> <p>Investigator on a number of clinical trials and observational studies related to vaccines. Untied grants and in kind support for laboratory assays provided via employer (Sydney Children's Hospitals Network) since 2010 from GSK, Pfizer and Merck.</p> | Nil                                              |
| Ms Karen Peterson         | Nil                                           | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Nil                                              |