

MATHESON VS. SCHMITT: DEPOSITION OF STANLEY A. PLOTKIN, M.D. – DEPOSITION BY AARON SIRI FOR THE PLAINTIFF

CASE # 2015-831539-DM, JANUARY 11, 2018, COUNTY OF OAKLAND CIRCUIT COURT, FAMILY DIVISION, MICHIGAN

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STANLEY A. PLOTKIN CREDENTIALS: WIKIPEDIA EXCERPTS

Biography: Born May 12, 1932. American physician who works as a consultant to vaccine manufacturers, such as Sanofi Pasteur, as well as biotechnology firms, non-profits and governments. In the 1960s, he played a pivotal role in discovery of a vaccine against rubella virus while working at Wistar Institute in Philadelphia. Today, in addition to his emeritus appointment at Wistar, he is emeritus professor of Pediatrics at the University of Pennsylvania. His book, "Vaccines", is the standard reference on the subject. He is an editor with Clinical and Vaccine Immunology, which is published by the American Society for Microbiology in Washington, D.C.

Vaccine Research Background: During his time at Wistar, Plotkin worked on several vaccines; chief among them are vaccines for rubella, rabies, rotavirus, and cytomegalovirus (CMV). He developed a vaccine for rubella, based upon the RA 27/3 strain of the virus (also developed by Plotkin using WI-38 human fetal stem cells), which was released to the public in 1969. Plotkin, working with Tadeusz Wiktor and Hilary Koprowski, produced a human vaccine for rabies during the 1960s and 1970s. Another vaccine that **Plotkin** co-developed, working with **H. Fred Clark and Paul Offit**, is for rotavirus. In 2006, **the team's vaccine became part of the U.S. recommended vaccine schedule for babies**. In the 1970s, Plotkin lead the development of an experimental vaccine against cytomegalovirus.



“Dr. Plotkin has been a tireless advocate for the protection of humans, and children in particular, from preventable infectious diseases. His lifetime of work on vaccines has led to profound reductions in both morbidity and mortality not only in the United States, but throughout the world (sic). His unbending adherence to the principle of being guided by outstanding science has led him to be admired by his peers. He demonstrates the combination of scholar, scientist and public servant.” --- Vijay B. Samant, President and CEO of **Vical, Inc.**

From Vical, Inc. website: “**Vical develops biopharmaceutical products** for the prevention and treatment of chronic or life-threatening infectious diseases based on our **patented DNA delivery technologies** and other therapeutic approaches.”

Positions Held: 2006: Professor Emeritus of Virology, University of Pennsylvania; 2006: Executive Advisor, Sanofi Pasteur; 2014: Senior Advisor, Global Virus Network; Associate Chairman, Department of Pediatrics, University of Pennsylvania; Member, Center for HIV/AIDS Vaccine Immunology; Adjunct professor, Johns Hopkins Bloomberg School of Public Health; Scientific advisor, Mymetics.

Awards: 1993: Distinguished Physician Award, Pediatric Infectious Disease Society; 1995: Ed Nowakowski Senior Memorial Clinical Virology Award, Pan American Society for Clinical Virology; 2007: Distinguished Graduate Award, Perelman School of Medicine at the University of Pennsylvania; 2009: Maxwell Finland Award for Scientific Achievement; 2013-2014: Hamdan Award for Medical Research Excellence; 2014: Dr. Charles Mérieux Award for Achievement in Vaccinology and Immunology.

Participation in Matheson Case: Plotkin was invited by Paul Offit and (XXX) to participate in this child custody case on behalf and in favor of the father defendant who wants to vaccinate his daughter against the mother’s wishes, in violation of her religious and other God-given and constitutional rights.

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<p>VIDEO -- PART 1</p>	<p>INTRODUCTION – WHOW PLOTKIN GOT INVOLVED IN CASE – KAREN ERNST ASKED HIM TO GET INVOLVED – PAUL OFFIT, HOW TO DISCREDIT ANTI-VAXXERS -- Knowledge of Child History in Case – Trips for Vaccine Industry Promotion – Gates Foundation -- Child Vaccination History and Particulars -- Number of Vaccines and Doses Recommended – Plotkin Developed Rotavirus Vaccine -- Major Vaccine Manufacturers Payments to Plotkin -- Voices for Vaccines Funding & Plotkin Participation – Task Force for Global Health --</p>	
<p>PERSONS WITH WHOM PLOTKIN DISCUSSED THIS CASE. HOW HE GOT INVOLVED. KAREN ERNST 8:38:12</p> <p>PAUL OFFIT INVOLVEMENT. DISCREDITING ANTI-VAXXERS 8:40: 54</p>	<p>SIRI: Did you discuss this deposition with anyone? PLOTKIN: Laura Nieuwma.</p> <p>SIRI: How did you first learn about this lawsuit? PLOTKIN: It was from a lady by the name of Karen Ernst, who was the head of an organization called Voices for Vaccines, which is a group of laypeople who are favorable to vaccination. And she had heard from the father, I believe, who was looking for experts to testify on his behalf.</p> <p>SIRI: So you discussed this lawsuit with her? PLOTKIN: Not really discussed the lawsuit. She referred me to the father, and I sent an email saying that I would be willing to testify. I have not talked to the father. I've never met the father. So I, everything has happened secondhand, so to speak.</p> <p>SIRI: And it was Karen Ernst who asked you to be an expert in this case? PLOTKIN: She asked me if I would be willing, yes.</p> <p>SIRI: So before today, other than speaking with opposing counsel and an email communication with Karen Ernst, you have not discussed this lawsuit, this deposition, or the role that you'd be playing here today with anybody else; is that right? PLOTKIN: I've had an email exchange with Paul Offit, Dr. Paul Offit, who is actually a former student of mine.</p> <p>SIRI: What did you discuss with Dr. Offit? PLOTKIN: I discussed with him the issues or the possible issues about refusal to vaccinate.</p> <p>SIRI: What was the substance of those discussions? PLOTKIN: The substance basically concerned what arguments are often used to oppose vaccination.</p> <p>SIRI: What are those arguments? PLOTKIN: The arguments generally are that vaccines can cause reactions and that the reactions are worse than the disease.</p>	

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<p>VaxTruth Website 8:43:20</p>	<p>SIRI: And what did Dr. Offit have to say about that? PLOTKIN: Well, he pointed out, of course -- and he's the author of a chapter in my Vaccines book -- that the opposite is true, that the disease is worse than the reactions to the vaccines.</p> <p>SIRI: Have you reviewed any documents to prepare for this deposition? PLOTKIN: You know, I've looked at the web. I don't usually do that, but I've looked at the web, some of the anti-vaccination websites ... Well, here's one called VaxTruth ... There are a couple of others that I looked at, many of which were appalling.</p> <p>SIRI: Why do you believe they're appalling? PLOTKIN: Because they're ignorant of the facts, exaggerations, half-truths, or even misconceptions.</p> <p>SIRI: VaxTruth, does that website, is that a website that catalogs personal stories of families who believe their child was injured by vaccines? PLOTKIN: You know, I did not -- what shall I say? -- read these word for word. I imagine that that's the case, but I couldn't tell you specifically about which website says what.</p>	
<p>Knowledge of Basic Child History in Case 8:47:20</p>	<p>SIRI: Have you discussed the child at issue in this case? PLOTKIN: No.</p> <p>SIRI: So you don't know anything specific about the child at issue in this case, correct? PLOTKIN: I do not.</p> <p>SIRI: You don't know anything about her medical history, correct? PLOTKIN: Correct.</p> <p>SIRI: And you don't know anything about her family's medical history, correct? PLOTKIN: Correct.</p>	
<p>Plotkin Travel Related to Developing Vaccines 8:47:48</p>	<p>SIRI: Have you been on any trips in the last year? PLOTKIN: France ... Asia ... Europe ... Japan ... Germany ... England ... California ... Washington ... San Francisco ... San Diego ...</p> <p>SIRI: What were the purpose of most of these trips? PLOTKIN: Attend meetings, scientific meetings.</p> <p>SIRI: Were any of them related to companies developing vaccines?</p>	

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<p>Rotavirus Manufacturer – Plotkin</p> <p>Major Vaccine Manufacturers Payments to Plotkin 9:10:02</p>	<p>SIRI: Sitting here today, do you know whether Faith has any contraindications? PLOTKIN: I do not know.</p> <p>SIRI: So sitting here today, you don't know whether Faith should or should not actually get these vaccines? PLOTKIN: In the absence of a contraindication, Faith should receive the vaccines.</p> <p>SIRI: But you don't know whether she has a contraindication? PLOTKIN: I do not know the medical history of the child.</p> <p>SIRI: Rotavirus, what are the brand names and companies that manufacture those? PLOTKIN: Well, actually, one of the rotavirus vaccines I developed, so I do know that the trade name is called RotaTeq. And the other one is called Rotarix.</p> <p>SIRI: Who sells those, manufactures those? PLOTKIN: Merck manufactures RotaTeq, and GSK manufactures Rotarix.</p> <p>SIRI: So every vaccine that you believe Faith should receive is produced by either Merck, Sanofi, GSK, or Pfizer, correct? PLOTKIN: Yeah. That's pretty much the case. In this country, at the present time, there are a limited number of vaccine manufacturers because vaccine manufacture is difficult and costly.</p> <p>SIRI: Would it be correct to call these four companies the big four vaccine manufacturers? PLOTKIN: Yes, that's correct.</p> <p>SIRI: Have you received any payments from Sanofi or any of its related or predecessor entities? PLOTKIN: Yes. Certainly.</p> <p>SIRI: In what years did you receive payments? PLOTKIN: Oh, geez. Well, first of all, as you should know, in the 1990s I was medical and scientific director of Sanofi Pasteur, and so obviously I was paid by them. And since then I've been consulting for manufacturers, for biotechs, for governments, for nonprofits, and essentially for anyone interested in vaccine development. And so I have been remunerated by companies, not by nonprofits, obviously, and that is essentially what I do.</p> <p>SIRI: Is there a year since 1990 that you've not received any kind of payment or remuneration from Sanofi? PLOTKIN: Probably not, no.</p>	
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<p>Voices for Vaccines Funding & Plotkin Participation 9:23:57</p>	<p>SIRI: How much did you receive -- what would you say is approximate total amount of payments and remunerations you've received from Sanofi during your lifetime?</p> <p>PLOTKIN: Oh, my God. I have no idea. I'm sure it's a sizable amount of money ... Well, again, I'm not prepared to answer this question, but I'm sure it's a considerable amount of money. And over the years, it could well be more than a million.</p> <p>SIRI: So what I'm asking, has any entity, so any business company, that you've had directly or indirectly more than 1 percent ownership interest, okay, has any company like that received money from Sanofi?</p> <p>PLOTKIN: Well, again, I'm not sure I understand the question. But I am the principal (100% ownership) of a company called Vaxconsult ... which essentially was organized to make things easier from the tax point of view. And that entity, if that's what you mean, has received payments from companies for whom I consult.</p> <p>SIRI: You anticipate to continue to receive payments or any kind of other remuneration from Sanofi in the future?</p> <p>PLOTKIN: As long as my health holds out, yes.</p> <p>SIRI: What are those payments for?</p> <p>PLOTKIN: For advice.</p> <p>SIRI: Have you received any payments from Merck or any of its related or predecessor entities?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: What year did you receive payments?</p> <p>PLOTKIN: All I can say is since I stopped working for Sanofi, which was in early 2000s, I've consulted for essentially all of the major manufacturers. I do not know how much I received. But I have certainly received payments from Merck, from Glaxo, from Pfizer, and many other entities.</p> <p>PLOTKIN: Voices for Vaccines, for example, receives no funding from any of the pharmaceutical companies, and that is in order to avoid any suggestion of a conflict of interest. I think that's probably true for a number of the nonprofits I advise. But obviously it may not be true for companies.</p> <p>SIRI: So you're saying Voices for Vaccines doesn't receive any funding from pharmaceutical companies?</p> <p>PLOTKIN: None.</p>	
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<p>Task Force for Global Health</p>	<p>SIRI: What's your affiliation with that group? PLOTKIN: Well, I was one of those who suggested that an organization of laypeople, as opposed to scientists, would be a good idea to oppose all of the nonsense that one sees on the web from anti-vaccination organizations.</p> <p>SIRI: So it was your idea to create Voices for Vaccines? PLOTKIN: It wasn't my sole idea. It was a suggestion that I made at a certain point. And it turned out that there were laypeople who were interested in promoting vaccines. Since then I've been on their advisory Board. But other than that, I have no role in the organization.</p> <p>SIRI: But you were, from what I'm understanding, tell me if I'm correct, it sounds like you were a driving force in suggesting its creation and at least initially -- getting it set up; is that correct? PLOTKIN: Yes.</p> <p>SIRI: I'm going to hand you what has been marked as Plaintiff's Exhibit 1 ... Dr. Plotkin, do you recognize this as a printout from the Voices for Vaccines website? PLOTKIN: Well, that's what it says. I don't read the website that often, but yes.</p> <p>SIRI: Now, you see at the very end on the last page, Dr. Plotkin, see at the very bottom it says: Voices for Vaccines is an administrative product of the Task Force for Global Health? PLOTKIN: Yes.</p> <p>SIRI: And it receives funding from that organization, correct? PLOTKIN: No. It does not receive funding. The task force was asked to do the -- what shall I say? -- the financial stuff required for an organization like Voices for Vaccines. But it does not contribute financially to Voices for Vaccines.</p> <p>SIRI: Dr. Plotkin, I'm going to hand you what's been marked as Exhibit 2. This is a form 990 tax return for the Task Force for Global Health ... do you see Section 4C? PLOTKIN: Yes.</p> <p>SIRI: Where there's expenses of \$3,757,924? PLOTKIN: Yes.</p>	<p>Exhibit 1¹</p> <p>Exhibit 2²</p>
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¹ See Exhibit 1: Voices for Vaccines – Mission.

² See Exhibit 2: Task Force for Global Health, Form 990 - Tax Form

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	<p>SIRI: Do you see that one of the groups receiving part of that funding was, in the last line, Voices for Vaccines? ... I'll read to it you, number four. It says, number four says: Describe the organization's programs, service, accomplishments for each of its three largest program services as measured by expenses.</p> <p>PLOTKIN: Yeah.</p> <p>SIRI: Are you claiming that this document does not represent that Voices for Vaccines received funding from the Task Force for Global Health?</p> <p>PLOTKIN: As far as I am aware, that the Voices for Vaccines receives no funding from the task force. The task force under Dr. Alan Hinman has agreed to do the financial, whatever is required by the government to do the financial work, for Voices for Vaccines. But as far as I'm aware, it receives no funding from the task force or any other governmental or semi-governmental entity.</p> <p>SIRI: So the task force does provide some support for Voices for Vaccines, correct?</p> <p>PLOTKIN: It does.</p> <p>SIRI: Does the Task Force for Global Health receive funding from any of the big four pharmaceutical companies?</p> <p>PLOTKIN: I do not know ...</p>	
VIDEO -- PART 2	TASK FORCE FOR GLOBAL HEALTH FUNDED BY VAXX MANUFACTURERS -- Plotkin Vaccines -- Immunization Action Coalition -	
Task Force for Global Health	<p>PLOTKIN: (I do not know ...) for a fact, but I doubt it. The task force, I know, secondhand. But I, I believe that they receive funding from CDC, but as far as I know, not from companies.</p> <p>SIRI: Dr. Plotkin, I'm going hand you what's 5 been marked as Plaintiff's Exhibit 3.</p> <p>PLOTKIN: Yeah. So? ... I see, yes, where it says: Funders. Well, I stand corrected. So the task force, then, does receive funding from companies. However, I don't see that has any bearing on its work for Voices for Vaccines.</p> <p>SIRI: So does this show that the Task Force for Global Health received funding from GSK?</p> <p>PLOTKIN: Yes, it does. But I want to repeat that the Voices for Vaccines has studiously avoided receiving funding from any company. And the fact that the task force is doing its finances was only a matter of convenience and an offer from Dr. Hinman that they would do that because they have experience with filing tax returns, et cetera.</p>	TP# 52 Exhibit 3 ³

³ See Exhibit 3: The Task Force for Global Health – Fact Sheet

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<p>Plotkin Vaccines 9:42:05</p>	<p>And I do not believe, and I strongly do not believe that any of the funding to the task force passes to Voices for Vaccines.</p> <p>SIRI: Does the Task Force for Global Health receive funding from Merck? PLOTKIN: Yes.</p> <p>SIRI: And from Pfizer? PLOTKIN: Apparently, yes.</p> <p>SIRI: So the Task Force of Global Health receives funding from pharmaceutical companies. And at the least, I'm understanding from you, provides some kind of administrative support services to the Voices for Vaccines, correct? PLOTKIN: Correct.</p> <p>SIRI: And one of the founding voices to create that organization was yourself, correct? PLOTKIN: I was one of those who suggested it, yes.</p> <p>SIRI: And you received remuneration from pharmaceutical companies, correct? PLOTKIN: I do, yes.</p> <p>SIRI: Is there any other education or nonprofit institution in which you've been affiliated that you're aware of that does not and has not received funding from any of the, any vaccine company? PLOTKIN: Well, I certainly advise the Gates Foundation. I advise the National Institutes of Health. I think those are the major institutions that are not in the business of, in the business of developing vaccines. And they do not receive funding from companies.</p> <p>SIRI: Does the NIH hold any patents on any vaccine-related technology? PLOTKIN: I believe they do, yes.</p> <p>SIRI: Do they receive royalties from those patents? PLOTKIN: I imagine they do, yes.</p> <p>SIRI: Have you ever worked on developing a vaccine that was eventually used by the public? PLOTKIN: Yes.</p>	
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<p>Varicella Vaccine 9:42:51</p>	<p>SIRI: Which ones? PLOTKIN: Let's see. Well, rubella, rotavirus, rabies, and I made contributions here and there to anthrax, cytomegalovirus, varicella. That's all I can remember at the moment.</p> <p>SIRI: When you say you contributed to it, how did you contribute to development of varicella? PLOTKIN: Essentially by showing how it could be used and demonstrating that it was safe and effective.</p> <p>SIRI: Did you work directly with Merck on that? PLOTKIN: I don't recall whether it was directly with Merck or not. Certainly it was the vaccine produced by Merck. But whether -- I don't recall that they actually funded my studies of varicella vaccine. But they were, they were the producers of the vaccine, certainly.</p> <p>SIRI: Where were you working when you did this work? PLOTKIN: At Children's Hospital of Philadelphia.</p> <p>SIRI: Have you developed or been part in any way in the development of any vaccine from which you have received any payment, revenue, or income related to the sale of that vaccine? PLOTKIN: Yes. Although I should stipulate that all of the patents on vaccines that I've developed have been taken out by the institutions for which I was working and that they gave me -- and I stress that it was not a requirement, but they gave me part of the profits deriving from the patents.</p> <p>SIRI: Which vaccines are those? PLOTKIN: Mainly rubella, rotavirus, and rabies.</p> <p>SIRI: And the rubella vaccine that you developed is currently used as part of the MMR vaccine? PLOTKIN: Correct.</p> <p>SIRI: And this is one of the vaccines you believe Faith's pediatrician should purchase and administer to her? PLOTKIN: Absolutely.</p> <p>SIRI: What is the total amount of payments in any form you have directly or indirectly received from the sale of the rubella vaccine? PLOTKIN: I cannot give you a figure. I would say that I do not doubt. But, again, I'd have to ask my wife. I do not doubt that they were substantial amounts of money, and similarly for rotavirus and rabies.</p>	<p>TP# 57</p>
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<p>Windstar Institute – Vaccine Patent Holder 9:48:25</p>	<p>SIRI: Was it in the millions of dollars for rubella? Just rubella. PLOTKIN: I don't think so. That's all I can say. I don't think so ... And certainly what I've done has not been based on what remuneration I could receive from the work that I've done.</p> <p>SIRI: Now, do you have -- you said that you're not sure whether it was in the millions of dollars that you've received from the sale of rubella, correct? PLOTKIN: Correct.</p> <p>SIRI: But it could have been? PLOTKIN: I doubt it, but it could have been. I don't think so.</p> <p>SIRI: Who provided you those payments? PLOTKIN: The Wistar Institute.</p> <p>SIRI: Did it come from any other source other than Wistar? PLOTKIN: I don't think so because the Wistar holds the patent.</p> <p>SIRI: Were you listed as one of the patent – one of the inventors? PLOTKIN: I believe so, yes.</p> <p>SIRI: But the Wistar was the assignee; is that right? PLOTKIN: Yes.</p> <p>SIRI: And so they received the -- they're the ones who had the, gave the license to Merck? PLOTKIN: Yes. Yes.</p> <p>SIRI: So Merck would pay Wistar, and then Wistar would remit some of that to you; is that correct? PLOTKIN: That's correct.</p>	<p>TP# 60</p>
<p>Plotkin Inventor of RotaTeq 9:49:42</p>	<p>SIRI: And you obtained a patent for RotaTeq? PLOTKIN: Wistar and Children's Hospital developed patents.</p> <p>SIRI: Who is listed as the inventor or co-inventors? PLOTKIN: Myself, Paul Offit and Fred Clark.</p>	<p>TP# 62</p>

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	<p>SIRI: How much remuneration to date have you received from sales of RotaTeq? PLOTKIN: I couldn't tell you exactly, but it's been a considerable amount.</p> <p>SIRI: Has it been in the millions? PLOTKIN: I hesitate to say exactly. It could be, but I really do not know.</p> <p>SIRI: What portion from the sale of RotaTeq was CHOP entitled to? PLOTKIN: Well, as I understand it, 50 percent.</p> <p>SIRI: And what percent of that 50 were you entitled to? PLOTKIN: I don't know.</p> <p>SIRI: Did there ever come a time where CHOP sold its interest in the RotaTeq virus vaccine? PLOTKIN: I believe so, yes.</p> <p>SIRI: Do you remember how much approximately it was sold for? PLOTKIN: No.</p> <p>SIRI: I'm going to hand you what is being marked as Plaintiff's Exhibit 4. This is a press release from Royalty Pharma. And the title of the press release is: Royalty Pharma acquires royalty interest in RotaTeq from the Children's Hospital Foundation for 182 million ... Looking at Exhibit No. 4, does that refresh your recollection of how much CHOP sold its interest in RotaTeq for in 2008? PLOTKIN: Assuming it's correct, yes.</p> <p>SIRI: Do you have any reason to doubt that CHOP sold its RotaTeq interest in 2008 for \$182 million? PLOTKIN: I have no reason to doubt it.</p> <p>SIRI: Did you receive a portion of those proceeds? PLOTKIN: I believe so, yes.</p> <p>SIRI: What was that amount? PLOTKIN: I could not tell you precisely. I really can't. I don't do these things for the money. And although it's gratifying to receive monetary awards, I don't personally keep track of it.</p>	<p>Exhibit 4⁴</p>
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⁴ See Exhibit 4: Royalty Pharma Press Release.

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	<p>SIRI: You're here today opining that Faith should receive vaccines that are made by the big four pharmaceutical companies, correct?</p> <p>PLOTKIN: I am, yes.</p> <p>SIRI: Okay. And you didn't anticipate that your financial dealings with those companies would be relevant in that issue?</p> <p>PLOTKIN: I guess, no, I did not perceive that that was relevant to my opinion as to whether a child should receive vaccines. Vaccines have to be made by somebody. And, of course, in this world they're made by pharmaceutical companies who make profits on vaccines. And the fact that they make profits on vaccines has no bearing on whether those vaccines are good for a child or not.</p> <p>SIRI: So you think the fact that pharmaceutical companies make money on vaccines doesn't bias how they approach the promotion of their own products?</p> <p>PLOTKIN: I imagine it biases them in favor of vaccines, but so does most of the scientific world.</p> <p>SIRI: Are you saying most of scientific world is biased because of financial – conflicts of interest?</p> <p>PLOTKIN: No. I'm saying most of the scientific world believes that vaccines protect children against serious diseases.</p> <p>SIRI: You stated earlier your co-inventor on this was Paul Offit?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: If I told you he said that he received approximately \$6 million, would that -- would that help you recall how much you received?</p> <p>PLOTKIN: Not really, but I believe whatever Paul has said I'm sure is correct.</p> <p>SIRI: So is \$6 million a lot of money, in your opinion?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: If you received \$6 million, do you think you'd remember?</p> <p>PLOTKIN: Actually, Counselor, no. I hesitate to say this because it sounds as if I'm some sort of idiot. But I really do not follow what income I get. I have no doubt that it was a lot of money, but I cannot give you an exact figure. I actually do not read my own tax returns. I say that in complete honesty.</p>	
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<p>Immunization Action Coalition 10:02:24</p>	<p>SIRI: Did there ever come a time -- and you receive a portion of the proceeds that Wistar receives, correct? PLOTKIN: Yes.</p> <p>SIRI: How much approximately have you received 5 in the past? PLOTKIN: I don't remember.</p> <p>SIRI: Do you recall Wistar selling a portion of its royalty interest to RotaTeq? PLOTKIN: I believe they have.</p> <p>SIRI: Do you remember approximately how much? PLOTKIN: No.</p> <p>SIRI: I'm going hand you what's been marked as Plaintiff's Exhibit 5. It's a PR Newswire article. Can you read the title, please? PLOTKIN: "The Wistar Institute Sells Partial Royalty Interest in Merck's RotaTeq to the Paul Royalty Fund."</p> <p>SIRI: Can you please read the first sentence of the article, Dr. Plotkin. PLOTKIN: The Wistar Institute today announced that it sold a portion of its anticipated worldwide royalty revenues from RotaTeq to an affiliate of the Paul Royalty Fund for \$45 million.</p> <p>SIRI: From this \$45 million sale, any recollection at all of how much you received? PLOTKIN: No recollection. I'm sure I received some.</p> <p>SIRI: Do you think it was sizable? PLOTKIN: I think it was probably sizable, yes.</p> <p>SIRI: More than a few hundred thousand? PLOTKIN: I think so. I don't have a figure in my head.</p> <p>SIRI: Are you familiar with the Immunization Action Coalition? PLOTKIN: Yes.</p> <p>SIRI: What is your understanding of what this group does?</p>	<p>TP# 69 Exhibit 5⁵</p>
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⁵ See Exhibit 5: PR Newswire 12/15/15 Press Release

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	<p>PLOTKIN: They promote vaccination through education and emails and meetings.</p> <p>SIRI: Would you say it's one of the main advocacy groups for vaccines in this country? PLOTKIN: I think it's an important one, yes.</p> <p>SIRI: Does it receive funding from pharmaceutical companies? PLOTKIN: I believe -- I think so. I'm not certain.</p> <p>SIRI: I'm going to hand you what's been marked as Plaintiff's Exhibit 6. It's a printout from the Immunization Action Coalition web page showing their funding for 2017. If you could kindly take a look at that and the section that says, that lists the pharma company donors. PLOTKIN: Mm-hmm.</p> <p>SIRI: Are any of the companies listed there vaccine manufacturers trying to develop vaccines? PLOTKIN: Yes.</p> <p>SIRI: Which ones? PLOTKIN: AstraZeneca, Glaxo, Merck, Pfizer, Sanofi, Seqirus.</p> <p>SIRI: So all of them? PLOTKIN: Yes.</p> <p>SIRI: Do you know approximately what percent of Immunization Action Coalition's funding comes from those pharmaceutical companies? PLOTKIN: No idea.</p> <p>SIRI: So just to recap, I think it would be correct to say that you've received in total from the companies that develop or manufacture vaccines payments or remuneration at least in the amount of a few million dollars, correct? PLOTKIN: I think it's correct to say that since I left Children's Hospital in the 1990s, I have received considerable funding for my work in developing vaccines and in advising companies how to develop vaccines, and I have also given advice freely to organizations that could not pay me because I believe that vaccines are important to the health of children and adults.</p>	<p>TP# 72 Exhibit 6⁶</p>
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⁶ See Exhibit 6: Immunization Action Coalition - IAC Funding 2017

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	<p>SIRI: So the answer is yes?</p> <p>PLOTKIN: The answer is yes, but I wish to say very clearly that none of the things that I have done have been done with the objective of gaining money. It has been my fortune that I have been rewarded financially for the work that I've done. But none of the things that I've done have been done for financial gain. And I resent very much the line of questioning that suggests that what I believe and what I've done have been done for financial reasons.</p> <p>SIRI: Nobody is suggesting that, Dr. Plotkin. I'm just asking you --</p> <p>PLOTKIN: Baloney, you are suggesting that.</p> <p>SIRI: You're suggesting that. Dr. Plotkin, you indicated that a lot of the remuneration you received is from the 1990s. Have you received any funding from the big four pharma companies or their predecessors before 1990?</p> <p>PLOTKIN: I would say probably not. You know, it's very hard to remember that far back. But certainly not any substantial funding. I may have received honoraria for attending meetings in those days, but certainly nothing, nothing considerable. At that point I was working at the University of Pennsylvania and the Children's Hospital and the Wistar Institute and was, of course, paid by those entities.</p> <p>SIRI: Did you receive any funding from any pharmaceutical company related to the development of vaccines before 1990?</p> <p>PLOTKIN: I don't recall receiving any funding for the development of rubella vaccine before it was licensed and then funding passed through Wistar. As far as rotavirus is concerned, I did have grants, not personal money, but grants for rotavirus development from Sanofi. And I had no funding for rabies. That's as much as I can recall.</p> <p>SIRI: I'm going hand you, Dr. Plotkin, what's been marked as Plaintiff's Exhibit 7. Can you read the title of the article, please.</p> <p>PLOTKIN: Attenuation of RA 27/3 Rubella Virus in WI-38 Human Diploid Cells.</p> <p>SIRI: Who is the first listed author?</p> <p>PLOTKIN: I am.</p> <p>SIRI: What is the year of this publication?</p> <p>PLOTKIN: 1969.</p> <p>SIRI: Does it say there that Mr. Plotkin is a recipient of an award from Smith, Kline -- is that a predecessor to GSK?</p> <p>PLOTKIN: Yes, it is.</p>	<p>TP# 77 Exhibit 7⁷</p>
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⁷ See Exhibit 7: Attenuation of RA 27/3 Rubella Virus in WI-38 Human Diploid Cells.

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	<p>SIRI: Does that refresh your recollection now of maybe what was an earlier time that you received funding from pharmaceutical companies towards development related to a vaccine?</p> <p>PLOTKIN: Yes ... I did have some funding from GSK, but they had their own candidate rubella vaccine.</p> <p>SIRI: Dr. Plotkin, I'm going to hand you what has been marked as Plaintiff's Exhibit 8. This is your CV (résumé), correct, Dr. Plotkin?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: It's quite a hefty CV, Dr. Plotkin. It's over 200 pages. I see there's 794 articles in it which you were the author, correct?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: That's a lot of articles. I see a lot of honors, including Who's Who in America since 1978.</p> <p>PLOTKIN: Mm-hmm.</p> <p>SIRI: I see you have positions in industry listed, correct?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: I see two of them. I see one is from 1991 to 1997, the medical and scientific director at the Sanofi.</p> <p>PLOTKIN: Yes.</p> <p>SIRI: And 1997-2009, executive advisor to the CO of Sanofi, correct?</p> <p>PLOTKIN: Correct.</p> <p>SIRI: But as discussed earlier, since 2009 you've also worked for Sanofi, correct?</p> <p>PLOTKIN: I have, yes.</p> <p>SIRI: And you worked for Merck?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: And Glaxo?</p> <p>PLOTKIN: Yes.</p>	<p>Exhibit 8⁸</p>
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⁸ See Exhibit 8: CV (Curriculum Vitae) of Dr. Plotkin

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	<p>SIRI: And Pfizer? PLOTKIN: Yes.</p> <p>SIRI: How come those aren't listed here, Dr. Plotkin? PLOTKIN: Well, they are consultancies. They're not official appointments. I don't have a, let's say, a title at Merck. I'm simply a consultant to them. So it's not in my CV.</p> <p>SIRI: What is Dynavax Technologies? PLOTKIN: Dynavax is a company that is working on adjuvantation of vaccines and has recently licensed a hepatitis B vaccine that is more immunogenic than the current vaccines.</p> <p>SIRI: This is a for-profit company? PLOTKIN: Yes.</p> <p>SIRI: Right. And it's involved in the development of vaccines, right? PLOTKIN: Yes.</p> <p>SIRI: You're on the Board of directors of this company, correct? PLOTKIN: Correct.</p> <p>SIRI: That affiliation is not disclosed on the CV, correct? PLOTKIN: It's not on the CV, no.</p> <p>SIRI: What is VBI Vaccines? PLOTKIN: Variation Bio.</p> <p>SIRI: Okay. And what is that? PLOTKIN: That's a biotech developing vaccines.</p> <p>SIRI: And this is a for-profit company as well, correct? PLOTKIN: Yes.</p> <p>SIRI: And you are also on the Board of Directors of this company, right? PLOTKIN: Yes.</p>	
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	<p>SIRI: And that affiliation is not disclosed in your CV, correct? PLOTKIN: It is not in my CV, no.</p> <p>SIRI: What is MyMetics? PLOTKIN: MyMetics is a biotech in Europe. Actually, I haven't done anything for them in at least a year now. But I think I'm still officially on their Board.</p> <p>SIRI: But that affiliation is not on your CV, correct? PLOTKIN: No.</p> <p>SIRI: Dynavax Technologies, what have you done for them? PLOTKIN: Dynavax, I've been on their Board.</p> <p>SIRI: Have you advocated on their behalf? PLOTKIN: Yes.</p> <p>SIRI: Have you done that in any government meetings, for example? PLOTKIN: Yes. Yes.</p> <p>SIRI: To seek licensure of the vaccine? PLOTKIN: Yes. It was just licensed.</p> <p>SIRI: And so you were advocating as a Board member of a technology company to get licensure of a new vaccine, correct? PLOTKIN: Yes. 10:21:52</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI:</p>	
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	<p>PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p>	
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	<p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p>	
VIDEO -- PART 3	TEXT FOR THIS SECTION --	
VIDEO -- PART 4	TEXT FOR THIS SECTION --	
VIDEO -- PART 5	TEXT FOR THIS SECTION --	

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VIDEO -- PART 6	TEXT FOR THIS SECTION --	
VIDEO -- PART 7	TEXT FOR THIS SECTION --	
VIDEO -- PART 8	<p>ALUMINUM ADJUVANTS IN BRAIN IMMUNE CELLS – ENCEPHALITIS AS A RESULT OF VACCINATION -- ANTIGENS IN VACCINES AND RELATED HARM -- MONKEY KIDNEY CELLS -- BLOOD SERUM FROM CALVES AND OTHER BOVINES IN VACCINES -- Embryonic Guinea Pig Cell Cultures in Vaccines -- Cow’s Milk Components in Vaccines -- Egg Protein in Vaccines -- Gelatin from Pigs in Vaccines -- Gelatin from Cows in Vaccines -- Recombinant GMO Yeast in Vaccines -- MRC-5 Human Diploid Cells and Tissues in Vaccines -- WI-38 Human Diploid Lung Fibroblast in Vaccines -- Human Albumin in Vaccines -- Recombinant Human Albumin in Vaccines -- Human DNA and Protein in Vaccines -- Insertional Mutagenesis -- Polio Vaccine Contamination with Simian Viruses -- Polysorbate 80 in Vaccines -- Adjuvants Bind to Impurities and Byproducts and the Body Develops Antibodies to Them -- Fetuses Used in Plotkin’s Work Related to Vaccines --Used Fetuses from Psychiatric Institutions -- Used Orphans to Study Experimental Vaccines -- Used the Mentally Handicapped to Study Experimental Vaccines -- Experiments Performed on Fully Functioning Adults and on Children -- Used Babies of Mothers in Prison -- Use of Over One Million Individuals Under Colonial Rule --</p>	TP# 309 to XXX
<p>ALUMINUM ADJUVANTS IN BRAIN IMMUNE CELLS 16:43:21</p>	<p>SIRI: Are these letters (Exhibits 37 and 38) written by individuals that are very experience in studying aluminum adjuvants? PLOTKIN: Yes.</p> <p>SIRI: Is the content of the letters similar to the letter from Chris Shaw (XXX)? PLOTKIN: Yes.</p> <p>SIRI: (Presents Exhibit 39). According to the author, he found some of the highest volume of aluminum in human tissue yet recorded in the brain of autistic children who died prematurely. PLOTKIN: Apparently that is the case.</p> <p>SIRI: Did you know that the standout observation of study is that aluminum was in the immune cells of the brain, including within immune cells traveling into the brain? PLOTKIN: Yes, but not associated with neurons.</p> <p>SIRI: They also found aluminum in the neurons as well, correct?</p>	<p>TP# 309 Exhibit 37⁹ Exhibit 38¹⁰</p> <p>Exhibit 39¹¹</p>

⁹ See Exhibit 37: 6/15/17 Letter to Institut Mondor

¹⁰ See Exhibit 38: 6/15/17 Letter to The Birchall Centre

¹¹ See Exhibit 39: Aluminium in Brain Tissue in Autism

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<p>ENCEPHALITIS AND ENCEPHALOPATHY AS A RESULT OF VACCINATION 16:45:36</p>	<p>PLOTKIN: But mostly in other cells. SIRI: In immune system related cells, right? PLOTKIN: Cells that travel, yes.</p> <p>SIRI: What is encephalopathy? PLOTKIN: It means something is wrong with the brain.</p> <p>SIRI: What is encephalitis and encephalomyelitis? PLOTKIN: Inflammation of the brain.</p> <p>SIRI: Do all of the 5 DTap containing vaccines sold in this country list encephalopathy within 7 days of a prior pertussis-containing vaccination as a contraindication to giving more pertussis vaccination PLOTKIN: Yes.</p> <p>SIRI: Do all Hepatitis A vaccines list encephalitis or encephalopathy as a reported adverse reaction in their inserts? PLOTKIN: Don't know for sure, but I imagine that it is a contraindication.</p> <p>SIRI: Do all of the Hepatitis B vaccines list the same contraindication? PLOTKIN: Yes.</p> <p>SIRI: Do almost all of the flu vaccines list the same contraindication? PLOTKIN: Yes.</p> <p>SIRI: Does the chickenpox vaccine list the same adverse reaction? PLOTKIN: Yes</p> <p>SIRI: Why do you think brain swelling is being reported after vaccination in all these vaccines? PLOTKIN: Anything that happens after vaccination is included in contraindications.</p>	<p>TP# 311</p>
<p>Amount of Antigens in Pediatric Vaccines and Related Harm 16:47:46</p>	<p>SIRI: What is the total quantity of antigen in most pediatric vaccines? PLOTKIN: Variable, perhaps up to 50 mg.</p> <p>SIRI: Are there any ingredients in vaccines that can damage neurons? PLOTKIN: Not that I am aware of.</p> <p>SIRI: Any ingredients that can damage human cells? PLOTKIN: Depends on the concentrations and so forth.</p>	<p>TP# 312</p>

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<p>Monkey Kidney Cells in Vaccines 16:48:59</p>	<p>SIRI: Do any of the vaccines on the childhood schedule contain monkey kidney cells? PLOTKIN: Well, the polio vaccine does.</p> <p>SIRI: Are the kidney cells removed from the monkey while the animal is still alive? PLOTKIN: Don't think so any more. These are from a cell line that will continue to multiple to make vaccines in; contrary to a regular kidney cells that will not continuously multiply.</p> <p>SIRI: Cells that continue to multiply unabated are typically are typically considered cancerous, right? PLOTKIN: Depends on the circumstances on the cell, but it is true, cancer cells do continue to replicate indefinitely.</p>	<p>TP# 314</p>
<p>Blood Serum from Calves and Other Bovines in Vaccines 16:51:58</p>	<p>SIRI: Do any vaccines in the childhood vaccine schedule contain blood serum from calves or other bovines? PLOTKIN: It is used to make the vaccines, but removed before the vaccine is used because you don't want to sensitize the vaccinee to cows.</p> <p>SIRI: Meaning if there was cow serum remaining in the vaccines the child can develop antibodies to cow products and can develop and allergy to it. PLOTKIN: Yes.</p> <p>SIRI: But you say there isn't any, right? PLOTKIN: It is removed, yes.</p> <p>SIRI: (Presented with Exhibit 40). Who produces this document, the CDC or FDA? PLOTKIN: I think the FDA.</p> <p>SIRI: And lists ingredients in vaccines, correct? PLOTKIN: Yes.</p> <p>SIRI: Do you see Calf's serum there? PLOTKIN: Yes, used to grow the polio virus.</p> <p>SIRI: And this is one of the ingredients that remains in the vaccine? PLOTKIN: I do not believe so.</p>	<p>TP# 316</p>
<p>Embryonic Guinea Pig Cell Cultures in Vaccines</p>	<p>SIRI: Do any vaccines on the childhood schedule contain embryonic guinea pig cultures? PLOTKIN: I don't think any current vaccine is made in guinea pig cells.</p>	<p>TP# 318</p>

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<p>16:54:13 Cow's Milk Components in Vaccines 16:55:41</p>	<p>SIRI: Do you know if any vaccines contain cows' milk in it or products from cow? (herein after "vaccines" or "any vaccines" refer to vaccines in the childhood schedule of the CDC, unless otherwise noted) PLOTKIN: Casein could be used (80% of solid matter in milk protein is made mostly of casein).</p> <p>SIRI: And if there was casein in the vaccines the child can become sensitized to that, correct? PLOTKIN: No, I'm not sure about that. I think there are other sensitizing things in calf's serum.</p>	<p>TP# 318</p>
<p>Egg Protein in Vaccines 16:56:41</p>	<p>SIRI: So do any vaccines contain egg protein? PLOTKIN: Yes, influenza vaccines.</p> <p>SIRI: Do those remain in the final product? PLOTKIN: I believe they do, yes.</p>	<p>TP# 319 Exhibit 40¹²</p>
<p>Gelatin from Pigs in Vaccines 16:56:58</p>	<p>SIRI: Do any vaccines contain gelatin from pigs? PLOTKIN: Yes.</p>	<p>TP# 319</p>
<p>Gelatin from Cows in Vaccines 16:57:03</p>	<p>SIRI: Do any vaccines contain gelatin from cows? PLOTKIN: Actually, I think in Muslim countries, they have tried to do that.</p>	<p>TP# 319</p>
<p>Recombinant GMO Yeast in Vaccines 16:57:25</p>	<p>SIRI: Do any vaccines contain recombinant GMO yeast? (Recombinant: relating to or denoting an organism, cell, or genetic material formed by recombination) PLOTKIN: Yes, I imagine so, yes.</p> <p>SIRI: Are there any other animal products in vaccines that you are aware of? PLOTKIN: Aside from trace amounts? No.</p>	<p>TP# 319</p>
<p>MRC-5 Human Diploid Cells and Tissues in Vaccines 16:59:40</p>	<p>SIRI: Do any vaccines on the childhood vaccine schedule contain MRC-5 human diploid cells? PLOTKIN: Yes, rubella, varicella, hepatitis A.</p> <p>SIRI: How are the cells created? PLOTKIN: By taking fetal tissue by a particular fetus that was aborted by maternal choice. They are not cell lines, they are cell strains cultivated from an aborted fetus, yes. They are not immortal, they live for about 50 generations and then die.</p>	<p>TP# 322</p>

¹² See Exhibit 40: Vaccine Excipient & Media Summary.

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<p>WI-38 Human Diploid Lung Fibroblast in Vaccines 17:01:46</p>	<p>SIRI: Do any vaccines contain WI-38 human diploid lung fibroblast? PLOTKIN: Thy used to. Has been replace by MRC-5.</p>	<p>TP# 323</p>
<p>Human Albumin in Vaccines 17:03:01</p>	<p>SIRI: And WI-38 was created from an aborted fetus; they took the lung tissue from the aborted fetus? PLOTKIN: Yes.</p> <p>SIRI: Do any vaccines contain human albumin? (Human albumin: Human serum albumin is the serum albumin found in human blood. It is the most abundant protein in human blood plasma; it constitutes about half of serum protein. PLOTKIN: Oh, yes.</p> <p>SIRI: From where was it obtained? PLOTKIN: Well that would be variable; from donors who are healthy donors. That’s all I can say.</p> <p>SIRI: How is it used in the manufacturing process? PLOTKIN: It is used to keep cells healthy during the process of making the vaccines.</p> <p>SIRI: So the viruses used in some of the vaccines are grown in this human blood component? PLOTKIN: Well, yes. I believe the serum is removed in the final product.</p> <p>SIRI: So none of it remains in the final product? PLOTKIN: I don’t believe so, no.</p> <p>SIRI: Because that could be problematic, right? PLOTKIN: Well, it could be, if the individual is not healthy.</p> <p>SIRI: Or maybe some of the human blood components bind to some of the aluminum and develops antibodies, self-antibodies, correct? PLOTKIN: If they develop antibodies against a serum component THAT WOULD NOT BE GOOD</p>	<p>TP# 325</p>
<p>Recombinant Human Albumin in Vaccines 17:05:41</p>	<p>SIRI: Do any vaccines contain recombinant human albumin? What is it? PLOTKIN: Yes. It is a component of human serum which is useful to stabilize cells and keep them healthy ... and it’s made by GENETIC ENGINEERING.</p> <p>SIRI: And you pretty much want to make sure that none of that remained in the final product, too, right? PLOTKIN: Well, human albumin is probably not much of a problem in terms of causing reactions.</p>	<p>TP# 327</p>

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<p>Human DNA and Protein in Vaccines 17:07:45</p>	<p>SIRI: But in terms of it potentially binding to the aluminum, that could be problematic, correct? PLOTKIN: Well, I don't know the answer to that question.</p> <p>SIRI: The vaccines that contain human material in them, they also contain human DNA and protein, correct? PLOTKIN: They may, yes.</p> <p>SIRI: Isn't it true that human DNA in vaccines is typically purposefully fragmented to below 500 base pairs in length? PLOTKIN: Yes, one doesn't want to put DNA into, attacked DNA into vaccines. I think the actual risk is zero, but that's my opinion.</p> <p>SIRI: Isn't it true that MMR II contains approximately 150 nanograms cells substrate double-strand DNA and single-strand DNA per dose purposefully fragmented to approximately 215 base base pairs in length? PLOTKIN: Yeah, that's probably correct, yes.</p> <p>SIRI: And is it true that VARIVAX, vaccine for chicken pox, is manufactured using WI-38 and MRC-5 -- PLOTKIN: Yes.</p> <p>SIRI: ... and contains approximately two 4 micrograms of cell substrate double-strand DNA or approximately 1 trillion fragments of human DNA? PLOTKIN: It may be true.</p> <p>SIRI: And the hepatitis vaccine also contains millions of fragments of human DNA? PLOTKIN: Likely.</p> <p>SIRI: Do you know whether strands of DNA below 500 base pairs are now known to insert themselves into living cells with which they come into contact? PLOTKIN: I do not have that information, but the likelihood that they would be genetically included in the genome of vaccines, in my view, is zero.</p> <p>SIRI: Do you have a study to support that view? PLOTKIN: I do not have a study that supports that view. But it is, to me, unlikely that the DNA would travel from the site of injection to the semen or the ovaries.</p> <p>SIRI: Could it insert into itself DNA even in the muscle tissue or if it gets into the blood? PLOTKIN: Theoretically. But that's not going to mean that it's going to have any impact on the individual.</p>	<p>TP# 328</p>
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<p>Insertional Mutagenesis</p>	<p>SIRI: Are you familiar with the insertional mutagenesis? (insertional mutagenesis is the creation of mutations of DNA by the addition of one or more base pairs) PLOTKIN: Yes.</p> <p>SIRI: Do you have any study to show that injecting millions of pieces of human DNA into babies and children is safe? PLOTKIN: The only studies are all the safety studies that have been done on vaccines ... and I'm not aware of any data showing that the inheritable characteristic was transmitted by a vaccine.</p> <p>SIRI: Is it possible it can cause cancer? PLOTKIN: Anything is possible, but there are no data to support that.</p> <p>SIRI: Is there data to show that it doesn't do that? PLOTKIN: Yes. Observations made over millions of vaccinees.</p> <p>SIRI: And you have the studies to show that, right? PLOTKIN: The studies are easily available in terms of vaccine safety studies that have been done by many, many people.</p> <p>SIRI: Vaccines contain dead or weakened polio virus, correct? PLOTKIN: IPV does, yes.</p>	<p>TP# 330</p>
<p>Polio Vaccine Contamination with Simian Viruses 17:12:25</p>	<p>SIRI: Beginning in the 1950s, polio vaccines were routinely grown on nonhuman primate kidney cells, correct? PLOTKIN: Correct.</p> <p>SIRI: Are you aware of any simian monkey viruses, meaning viruses that come from primates, 3 that contaminated polio vaccines and infected individuals receiving the polio vaccine? PLOTKIN: Yes. SV40; Simian Virus 40.</p> <p>SIRI: Was it the 40th simian virus found? PLOTKIN: Yes.</p> <p>SIRI: Are you aware of any other simian viruses that are in any vaccine? PLOTKIN: At this stage, no.</p> <p>SIRI: Are you aware of any bovine virus that is in any vaccine? PLOTKIN: Well, bovine virus. Nothing comes to mind at the moment.</p>	<p>TP# 331</p>

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	<p>SIRI: Are you aware of any virus from any animal other than simian or bovine that is in any vaccine? PLOTKIN: Yes. There's a pig virus present in one of the rotavirus vaccines; Circovirus 2.</p> <p>SIRI: Are you aware of any retrovirus that are in any vaccine? PLOTKIN: No.</p> <p>SIRI: Are you aware of any prions that are in any vaccine? (Prions are misfolded proteins which characterize several fatal neurodegenerative diseases in animals and humans) PLOTKIN: No.</p> <p>SIRI: You indicated that they did find a porcine circovirus type 2 in rotavirus, correct? PLOTKIN: Yes.</p> <p>SIRI: Was that unintentional? PLOTKIN: Yes.</p> <p>SIRI: When it was released to the market, they didn't know that virus was in there, correct? PLOTKIN: Correct.</p> <p>SIRI: And when they released the polio vaccine on the market, they didn't know SV40 was in there, correct? PLOTKIN: Correct.</p> <p>SIRI: Are you aware of how many micrograms of 2-phenoxyethanol a child following the childhood vaccine schedule would be injected with? (Phenoxyethanol is a colorless liquid with a pleasant odor. It is a glycol ether used as a perfume fixative, insect repellent, antiseptic, solvent, preservative, and also as an anesthetic in fish aquaculture) PLOTKIN: No. I'd have to look that up.</p> <p>SIRI: Do you think it's close to around a hundred micrograms? PLOTKIN: It could be, but I'd have to look it up.</p> <p>SIRI: Do you know safe level in terms of that ingredient? PLOTKIN: I am not aware that there, that there is toxicity associated with 2-phenoxyethanol. It's a fairly harmless substance, as far as I'm aware.</p> <p>SIRI: Do you know any vaccines in the childhood schedule that include ferric nitrate?</p>	
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<p>Polysorbate 80 in Vaccines</p>	<p>PLOTKIN: No, I don't recall that.</p> <p>SIRI: Are you aware of how many micrograms of polysorbate 80 a child following the vaccine schedule would be injected with? (Polysorbate 80 is a nonionic surfactant and emulsifier often used in foods and cosmetics)</p> <p>PLOTKIN: I don't have the amount, no.</p> <p>SIRI: (Presented Exhibit 40). You indicated that you weren't aware that WI-38 was in the final vaccine product ... Do you see that within the ingredient list that lists WI-38 human diploid lung fibroblast?</p> <p>PLOTKIN: Yes, I do see that.</p>	<p>TP# 334</p> <p>Exhibit 40¹³</p>
<p>Adjuvants Bind to Impurities and Byproducts and the Body Develops Antibodies to Them 17:18:37</p>	<p>SIRI: Isn't it true that an adjuvant will bind not only to the target antigen but also to the impurities and byproduct of the manufacturing process?</p> <p>PLOTKIN: Probably, yes.</p> <p>SIRI: And those impurities and byproducts are all listed in what has been marked as Exhibit No. 40, correct?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: Once the impurities or byproducts are bound to the aluminum, the body may also develop antibodies to these impurities and byproducts, correct?</p> <p>PLOTKIN: "May" is the operative word, but not necessarily.</p> <p>SIRI: The entire purpose of the aluminum binding to a protein structure, be it an antigen or some other protein structure, is to cause an immune response that would develop antibodies, correct?</p> <p>PLOTKIN: Yes. But the protein has to be of the right size and presentation in order to induce an immune response.</p> <p>SIRI: Do you know whether the protein structure for any of the ingredients on Exhibit 40 are not the right size to bind to aluminum?</p> <p>PLOTKIN: Well, things like calf serum, if they were present, would, would possibly induce an immune response.</p> <p>SIRI: How about, and we talked earlier, human albumin, that would be of a big enough protein structure to bind to aluminum, correct?</p> <p>PLOTKIN: It could, although the fact that it's human means that individuals might well not respond to -- that is, not respond to human albumin as a foreign protein.</p> <p>SIRI: Right. Maybe not alone, right? But bound to alum it might, correct?</p>	<p>TP# 336</p>

¹³ See Exhibit 40: Vaccine Excipient & Media Summary.

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<p>Fetuses Used in Plotkin's Work Related to Vaccines 17:25:12</p>	<p>PLOTKIN: It might. But I'm not aware of evidence that it does.</p> <p>SIRI: Are you aware of a study that looked at that issue? PLOTKIN: I have not read such a study, no.</p> <p>SIRI: How about the human DNA, do you believe that the human DNA strands can bind to the aluminum? PLOTKIN: No. I don't see any chemical reason why it should.</p> <p>SIRI: Any reason why it shouldn't? PLOTKIN: Proving a negative is always more difficult.</p> <p>SIRI: But you don't know for sure? PLOTKIN: I have not done the experiment, no.</p> <p>SIRI: Do you know whether alum would bind to MRC-5 or any of the cellular debris that's in the final product from MRC-5? PLOTKIN: Oh, I think it could, but I don't know that it does.</p> <p>SIRI: Do you know whether aluminum could bind to any of the cellular debris from WI-38? PLOTKIN: It might, but I don't know that for a fact.</p> <p>SIRI: Could alum bind to egg protein? PLOTKIN: Possibly.</p> <p>SIRI: And to casein? PLOTKIN: I suppose it's possible, but I'm not aware of any evidence. I don't know.</p> <p>SIRI: In your work related to vaccines, how many fetuses have been part of that work? PLOTKIN: My own personal work? Two.</p> <p>SIRI: So in your, in all of your work related to vaccines throughout your whole career, you've only ever worked with two fetuses? PLOTKIN: In terms of making vaccines, yes.</p> <p>SIRI: (Presented with Exhibit 41). Are you familiar with this article? PLOTKIN: Yes.</p>	<p>TP# 340</p>
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	<p>SIRI: Are you listed as an author on this article? PLOTKIN: Yes.</p> <p>SIRI: So this was related to your work? PLOTKIN: Well, yes, in a sense.</p> <p>SIRI: To vaccines, correct? PLOTKIN: Yes. It was preparatory.</p> <p>SIRI: So this study involved 74 fetuses, correct? PLOTKIN: Seventy-six.</p> <p>SIRI: And these fetuses were all three months or older when aborted, correct? PLOTKIN: Yes.</p> <p>SIRI: And these were all normally developed fetuses, correct? PLOTKIN: Yes.</p> <p>SIRI: These included fetuses that were aborted for social and psychiatric reasons, correct? PLOTKIN: Correct.</p> <p>SIRI: What organs did you harvest from these fetuses? PLOTKIN: Well, I didn't personally harvest any, but a whole range of tissues were harvested by co-workers.</p> <p>SIRI: And these pieces were then cut up into little pieces, right? PLOTKIN: Yes.</p> <p>SIRI: And they were cultured? PLOTKIN: Yes.</p> <p>SIRI: Some of the pieces of the fetuses were pituitary gland that were chopped up into pieces. PLOTKIN: Mm-hmm.</p> <p>SIRI: Included the lung, skin, kidney, spleen, heart and tongue of the fetuses?</p>	Exhibit 41 ¹⁴
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¹⁴ See Exhibit 41: Proceedings of the Society of Experimental Biology and Medicine.

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<p>Used Fetuses from Psychiatric Institutions 17:32:02</p> <p>Used Orphans to Study Experimental Vaccines 17:32:58</p> <p>Used the Mentally Handicapped to Study Experimental Vaccines 17:33:05</p>	<p>PLOTKIN: Yes.</p> <p>SIRI: So I just want to make sure I understand. In your entire career -- this was just one study. So I'm going to ask you again, in your entire career, how many fetuses have you worked with approximately?</p> <p>PLOTKIN: Well, I don't remember the exact number, but quite a few when we were studying them originally before we decided to use them to make5 vaccines.</p> <p>SIRI: Some of these (fetuses) were in psychiatric institutions, correct? I'm just asking you, some of the fetuses that you did use did come from abortions from people who were in psychiatric institutions, correct?</p> <p>PLOTKIN: I don't know that. What I'm telling you is that I got them from a co-worker; and if it's stated in the paper, it's true. But, otherwise, I do not know.</p> <p>SIRI: So if it's in the paper, you don't contest it, right?</p> <p>PLOTKIN: I don't contest it, no.</p> <p>SIRI: Have you ever used orphans to study an experimental vaccine?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: Have you ever used the mentally handicapped to study an experimental vaccine?</p> <p>PLOTKIN: I don't recall specifically having done that, but that in the 1960s, it was not unusual to do that. And I wouldn't deny that I may have done so.</p> <p>SIRI: there's an article entitled "Attenuation of RA 27/3 Rubella Virus in WI-38 Human Diploid Cells." Are you familiar with that article?</p> <p>PLOTKIN: Yes.</p> <p>SIRI: In that article, one of the things it says is 13 -- is one of the things it says is: 13 seronegative mentally retarded children were given RA 27/3 vaccine?</p> <p>PLOTKIN: Okay. Well, then that's, in that case that's what I did.</p> <p>SIRI: Have you ever expressed that it's better to perform experiments on those less likely to be able to contribute to society, such as children with handicap, than with children without or adults without handicaps?</p> <p>PLOTKIN: I don't remember specifically, but it's possible ... I've since changed my mind. But those were, that was a long time ago.</p> <p>SIRI: Do you remember ever writing to the editor of "Ethics on Human Experimentation"?</p> <p>PLOTKIN: I don't remember specifically, but I may well have.</p>	<p>TP# 346</p> <p>TP# 346</p> <p>TP# 347</p>
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<p>Experiments Performed on Fully Functioning Adults and on Children 17:36:58</p> <p>Used Babies of Mothers in Prison 17:37:38</p> <p>Use of Over One Million Individuals Under Colonial Rule 17:37:45</p> <p>XXXXXXXXXXXX</p>	<p>SIRI: (Presented with Exhibit 43). Do you recognize this letter you wrote to the editor? PLOTKIN: Yes.</p> <p>SIRI: Is one of the things you wrote: The question is whether we are to have experiments performed on fully functioning adults and on children who are potentially contributors to society or to perform initial studies in children and adults who are human in form but not in social potential? It may be objected that this question implies a Nazi philosophy, but I do not think that it is difficult to distinguish nonfunctioning persons from members of ethnic, racial, economic, or other groups. PLOTKIN: Yes. Mm-hmm.</p> <p>SIRI: Have you ever used babies of mothers in prison to study an experimental vaccine? PLOTKIN: Yes.</p> <p>SIRI: Have you ever used individuals under colonial rule to study an experimental vaccine? PLOTKIN: Yes.</p> <p>SIRI: Did you do so in the Belgian Congo? PLOTKIN: Yes.</p> <p>SIRI: Did that experiment involve almost a million people? PLOTKIN: Well -- well, all right, yes.</p> <p>SIRI: (Add info on visit to Africa) PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p> <p>SIRI: PLOTKIN:</p>	<p>Exhibit 43¹⁵</p> <p>TP# 349</p> <p>TP# 350</p> <p>TP# 350</p> <p>XXXXXXXXXXXX</p>
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¹⁵ See Exhibit 43: The New England Journal of Medicine, Vol. 289, No. 11.

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VIDEO -- PART 9		

DEPOSITION TRANSCRIPT	
Stanley A. Plotkin Deposition Transcript	https://tinyurl.com/Plotkin-Deposition-Transcript

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PLOTKIN DEPOSITION VIDEO LINKS	
Plotkin Deposition – Part 1	https://tinyurl.com/Plotkin-Deposition1
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Plotkin Deposition – Part 3	https://tinyurl.com/Plotkin-Deposition3
Plotkin Deposition – Part 4	https://tinyurl.com/Plotkin-Deposition4
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Plotkin Deposition – Part 6	https://tinyurl.com/Plotkin-Deposition6
Plotkin Deposition – Part 7	https://tinyurl.com/Plotkin-Deposition7
Plotkin Deposition – Part 8	https://tinyurl.com/Plotkin-Deposition8
Plotkin Deposition – Part 9	https://tinyurl.com/Plotkin-Deposition9
Plotkin Deposition – Playlist:	https://tinyurl.com/Plotkin-Deposition-Playlist

DEPOSITION EXHIBITS			
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Exhibit 1	48	Voices for Vaccines – Mission	
Exhibit 2	49	Form 990 - Tax Form	
Exhibit 3	52	The Task Force for Global Health – Fact Sheet	
Exhibit 4	64	Royalty Pharma Press Release	
Exhibit 5	69	12/15/15 Press Release	
Exhibit 6	72	Immunization Action Coalition - IAC Funding 2017	
Exhibit 7	77	Attenuation of RA 27/3 Rubella Virus in WI-38 Human Diploid Cells	
Exhibit 8	79	CV (Curriculum Vitae) of Dr. Plotkin	
Exhibit 9	131	Conflicts of Interest in Vaccine Policy Making - June 15, 2000	
Exhibit 10	149	Highlights of Prescribing Information - RECOMBIVAX HB	
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Exhibit 12	167	Poliovirus Vaccine Inactivated - IPOL - Sanofi Pasteur	
Exhibit 13	170	M-M-R II Description	
Exhibit 14	178	Highlights of Prescribing Information – ActHIB	
Exhibit 15	184	Highlights of Prescribing Information – GARDASIL	
Exhibit 16	189	Vaccine in Autoimmunity - Chapter Book (Retained by Counsel)	

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Exhibit 17	197	A Study of Gardasil in Preadolescents and Adolescents	
Exhibit 18	202	Highlights of Prescribing Information – Enbrel	
Exhibit 19	217	Adverse Effects of Pertussis and Rubella Vaccines	
Exhibit 20	227	Adverse Events Associated with Childhood Vaccines	
Exhibit 21	231	Adverse Effects of Vaccine - Evidence and Causality	
Exhibit 22	241	Adverse Effects of Vaccines: Evidence and Causality	
Exhibit 23	264	Professional Edition for Physicians – 2015 ICD9-CM Excerpt	
Exhibit 24	273	Pilot Comparative Study on the Health of Vaccinated and Unvaccinated 6- to 10 12-year-old U.S. Children	
Exhibit 25	278	Preterm Birth, Vaccination and Neurodevelopmental Disorders...	
Exhibit 26	282	The Introduction of Diphtheria-Tetanus-Pertussis and Oral Polio Vaccine Among Young Infants in an Urban African Community: A Natural Experiment	
Exhibit 27	288	Adverse Events Associated with Childhood Vaccines: Evidence Bearing on Causality	
Exhibit 28	289	Adverse Effects of Vaccines: Evidence and Causality	
Exhibit 29	296	In Vivo Absorption of Aluminum-Containing Vaccine Adjuvants Using 26AL	
Exhibit 30	297	Aluminum Hydroxide Injections Lead to Motor Deficits and Motor Neuron Degeneration	
Exhibit 31	299	Delivery of Nanoparticles to Brain Metastases of Breast Cancer Using a Cellular Trojan Horse	
Exhibit 32	299 (?)	Slow CCL2-Dependent Translocation of Biopersistent Particles from Muscle to Brain	
Exhibit 33	299 (?)	Highly Delayed Systemic Translocation of Aluminum-Based Adjuvant in CD1 Mice Following Intramuscular Injections	
Exhibit 34	301	Non-Linear Dose-Response of Aluminum Hydroxide Adjuvant Particles: Selective Low Dose Neurotoxicity	
Exhibit 35	302	Book: The Immune System and the Developing Brain	
Exhibit 36	305	6/24/17 Letter to University of British Columbia by Dr. Shaw with Attachments	
Exhibit 37	308	6/15/17 Letter to Institut Mondor	
Exhibit 38	308	6/15/17 Letter to The Birchall Centre	
Exhibit 39	309	Aluminium in Brain Tissue in Autism	
Exhibit 40	317	Vaccine Excipient & Media Summary	
Exhibit 41	340	Proceedings of the Society of Experimental Biology and Medicine	
Exhibit 42	348	Attenuation of RA 27/3 Rubella Virus in WI-38 Human Diploid Cells	
Exhibit 43	349	The New England Journal of Medicine, Vol. 289, No. 11	

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Exhibit 44	366	Untruths and Consequences: The False Hypothesis 16 Linking CHAT Type 1 Polio Vaccination to the Origin of Human Immunodeficiency Virus	
Exhibit 45	366	Postscript Relating to New Allegations Made by Edward Hooper at The Royal Society Discussion Meeting on 11 September 2000	
Exhibit 46	388	VAERS Results	
Exhibit 47	391	Electronic Support for Public Health - VAERS - 12/1/07 - 9/30/10	
Exhibit 48	397	VAERS Results	

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LEGAL NOTICE

This is my summary of the Stanley A. Plotkin deposition as noted herein. My description is based on the deposition video and transcript's content and on the statements and questions made therein. This summary is not verbatim in its totality. In a few instances questions and answers were combined for clarity and brevity. Comments in parenthesis are mine.

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FAIR USE STATEMENT

This Plotkin deposition summary document may contain copyrighted material the use of which has not been specifically authorized by the copyright owner(s). I am making such material available to the public in an effort to advance the public's understanding of the inner workings and business strategies of the global vaccine industry, its employees, agents and representatives (hereinafter vaccine industry representatives) to convince the public that their vaccines are safe and effective. Further, it is presented to provide a better understanding of how vaccine insert sheets are developed, written and manipulated to favor the vaccine industry's claim of vaccine safety. Further, it is presented to show the existing relationship between vaccine manufacturers' representatives and governmental agency employees and representatives, such as departments within the U.S. Department of Health and Human Service, including the Centers for Disease Control and Prevention, and the U.S. Food and Drug Administration, as well as to show the existing conflicts of interest between these governmental

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and quasi-governmental agencies and the vaccine industry and their representatives. Further, this document represents moral, social, human rights, economic, political, scientific, democratic and social justice issues, etc., of interest to the general public, which I believe constitutes a 'fair use' of any such copyrighted material as provided for in section 107 of the US Copyright Law.

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THIS DOCUMENT IS UNDER CONSTRUCTION AND BEING REVISED. UPDATES WILL BE DONE AND POSTED.

CERTIFICATION

I, Ricardo Beas, declare that this documents adheres to the original Plotkin deposition video and transcript noted herein to the best of my ability, knowledge, beliefs and upon information, using the original deposition video and text to accurately reflect the text therein, and is provided in good faith for the benefit of men, women and children around the world.

DATED this 19th day of January, 2019, at San Diego County, California.

Ricardo Beas

¹⁶ For evidence of the conspiracy between some pro-vaccine promoters in order to silence the opposition and remove all men, women and children's rights to refuse mandatory vaccination/immunization requirements see for example the email correspondence between Dorit Reiss, Stanley Plotkin, Paul Offit, Et Al at the following links: <https://tinyurl.com/Emails-Dorit-POffit>, <https://tinyurl.com/Emails-Dorit-Plotkin-1>, <https://tinyurl.com/Emails-Dorit-Plotkin-2>, <https://tinyurl.com/Emails-Dorit-Pan>, and <https://tinyurl.com/Emails-Dorit-Ricardo>.

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