



Indian Lawyers and Human Rights Activists' Association (ILHRAA)

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Date: 03.01.2023

To,

1. Shri Mansukh L. Mandaviya

Minister, Ministry of Health and Family Welfare

Email: hfm@gov.in

2. Dr Bharati Pravin Pawar

Minister of State, Ministry of Health and Family Welfare

Email: moshealth.akc@gov.in

3. Shri Rajesh Bhushan

Secretary, Ministry of Health and Family Welfare

Email: secyhfw@nic.in

Subject:

To follow the directions of Supreme Court and High Court and to Publish in clear language the death causing and other side effects of Covid Vaccines in FAQs and at all modes and in every communication.

1. In your FAQs you have mentioned side effects of Covid vaccines such as TTS (Thrombocytopenia Syndrome) etc. The said question and para reads thus;

“What are expected immediate and delayed side effects of this vaccine?”

Covishield®: Some mild symptoms may occur like injection site tenderness, injection site pain, headache, fatigue, myalgia, malaise, pyrexia, chills and arthralgia, nausea. Very rare events of demyelinating disorders, thrombosis with thrombocytopenia syndrome (TTS) have been reported following vaccination with this vaccine. Any specific Information for vaccine beneficiaries in relation to Covishield® vaccine?

A vaccine beneficiary vaccinated with any of the COVID-19 vaccines, particularly Covishield® and having one or more of the symptoms mentioned below should be suspected to have Thrombosis and Thrombocytopenia Syndrome (TTS). Persons taking Covishield should be vigilant for atleast 30 days after taking vaccine for the following symptoms:

- o Severe and persistent headaches with or without vomiting (in the absence of previous history of migraine or chronic headache)*
- o Shortness of breath*
- o Chest Pain*
- o Pain in limbs / pain on pressing the limbs or swelling in the limbs (arm or calf)*
- o Multiple, pinhead size red spots or bruising of skin in an area beyond the injection site*
- o Persistent abdominal pain with or without vomiting*

- o Seizures in the absence of previous history of seizures with or without vomiting*
- o Weakness/paralysis of limbs or any particular side or part of the body (includes cranial nerve involvements)*
- o Persistent vomiting without any obvious reason*
- o Blurred vision/ pain in eyes/Diplopia*
- o Mental status change / encephalopathy/ depressed level of consciousness*
- o Any other symptom or health condition which is of concern to the recipient or the family*

Contraindications for the administration of COVISHIELD in the context of TTS:

Past history of major venous and arterial thrombosis occurring with thrombocytopenia.”

2. That the AEFI reports had clearly established that many deaths are due to the side effects of the Covishield vaccine.

3. That because of the death causing side-effects around 21 countries have banned Covishield (Astrazeneca) vaccines.

Link:<https://www.aljazeera.com/news/2021/3/15/which-countries-have-halted-use-of-astrazenecas-covid-vaccine>

4. Furthermore you the noticee did not ban the said covid vaccines for the reasons best known to yourself and in your FAQ you have not mentioned in clear terms that vaccines have death causing side effects.

5. On the other hand you in your FAQ are once again mentioning incorrectly that vaccines are completely safe. The said question and answer reads thus;

“E. PRECAUTIONS

1. What precautions do I need to take after receiving the vaccine?

COVID-19 vaccines are safe but in case of any bodily discomfort or complaint, the beneficiary should contact Health Care Worker (HCWs) or visit the nearest health facility, District Immunization Officer or call at 1075.

2. If I suffer from HTN/DM/CKD/heart disease/lipid disorders etc., can I safely take this vaccine?

Overall, the vaccine is safe and efficacious in adults with co-morbidity. However, if you are concerned for any specific medical reason, please consult your Health Care Worker prior to Covid vaccination.”

6. Needless to mention that, because of the said incorrect statement you people will be liable to pay compensation to each victim who took vaccines on your misrepresentation that vaccines are completely safe.

7. Please see the judgement and ratio laid down by Hon’ble High Court in case of **Registrar General, High Court of Meghalaya Vs. State of Meghalaya 2021 SCC OnLine Megh 130** where it is ruled as under;

“.....

Thus, by use of force or through deception if an unwilling capable adult is made to have the flu vaccine would be considered both a crime and tort or civil wrong, as was ruled in Airedale NHS Trust v Bland reported at 1993 AC 789 = (1993) 2 WLR 316 = (1993) 1 All ER 821, around thirty years (30) ago. Thus, coercive element of vaccination has, since the early phases of the initiation of vaccination as a preventive measure against several

diseases, have been time and again not only discouraged but also consistently ruled against by the Courts for over more than a century.

In this context, around one hundred and seven (107) years ago, in Schloendorff v Society of New York Hospitals reported at (1914) 211 NY 125 = 105 NE 92; 1914 NY Justice Cardozo ruled that „every human being of adult years and sound mind has a right to determine what shall be done with their body“.

This finds mention in decisions of the European Commission and Court of Human Rights [X vs. Netherlands of 1978 (decision rendered on 4th December, 1978); X vs. Austria of 1979 (decision rendered on 13th December, 1979)] which has become truer in the present times across the world than ever before. Compulsorily administration of a vaccine without hampering one"s right to life and liberty based on informed choice and informed consent is one thing. However, if any compulsory vaccination drive is coercive by its very nature and spirit, it assumes a different proportion and character.

However, vaccination by force or being made mandatory by adopting coercive methods, vitiates the very fundamental purpose of the welfare attached to it.”

8. Please note that as per Law of Informed Consent, Rules of Universal Declaration of Bioethics and Human Rights 2005 and specific law laid down in the case of Montgomery Vs. Lanarkshire Health Board [2015] UKSC you are bound to tell the public about all the death causing and all other side effects in a simple and clear language understandable by the common man. Then only the consent of the citizens can be obtained.

9. That you have not mentioned in your FAQ that vaccines are having death causing side-effects.

10. That as per specific law laid down by the Hon'ble High Court in the case of **Master Haridaan Kumar Vs. Union of India 2019 SCC OnLine Del 11929** you are duty bound to publish the side-effects of the covid vaccines in all the electronic and print media (newspapers).

11. It seems that you have not performed the duty for the welfare of the common man.

12. On the contrary the records(RTI's) show that you have wasted around 8400 crores in promoting the vaccines by hiding their side effects.

Link:https://drive.google.com/file/d/1JN15ErPllrcgCEERM08Eu-rAE0XjjV0/view?usp=share_link

13. Needless to mention that vaccinating or promoting vaccination by suppressing and concealing side-effects attract the provisions of Section 115, 302, 420, 120(B), 34, 109, etc of IPC.

14. This prima facie leads to the inference that you are acting for the welfare of the vaccine companies at the cost of life of the public and wasting thousands of crores of public money. This comes under the provisions of Sections 409, 120(B), 34 of the IPC.

15. You are hereby called upon to forthwith withdraw the false narratives that vaccines are completely safe and publish in clear language and inform us accordingly about death causing and all other serious side effects of the covid vaccines.

16. Please note that if we did not receive your reply within 7 days from the date of receipt of this notice by you then we will be compelled to file Writ Petition before the Hon'ble High Court or Hon'ble Supreme Court.

17. This notice is independent of and reserving our rights to initiate appropriate legal civil and criminal proceedings against you.

Place: Mumbai

Date: 03/01/2023

A. H. Koiri



(Secretary General)

**Indian Lawyers and Human Rights
Activists' Association**

Copy To:-

1. Hon'ble Prime Minister of India
2. Hon'ble Home Secretary
3. Hon'ble Director of C.B.I.
4. Hon'ble Central Vigilance Commissioner