

Exclusively Employment Law Solicitors

**pjhlaw**

Dame June Raine  
CEO  
MHRA

Via email:  
Cc:

12 October 2022

Dear Doctor Raine

**Re: FOIA Request for HART:**

I am instructed by HART.

Statement re HART:

HART is a group of doctors, scientists, economists, psychologists, and other academic experts. HART is seeking the data the MHRA has reviewed concerning the AstraZeneca vaccine to provide the necessary peer review.

Releasing data so that independent scientists can review it is akin to asking for a second opinion from a doctor, or a peer review of a scientific paper.

The following academics and clinicians specifically request the data:

Dr Jonathan Engler, MBChB, LIB (hons), DipPharmMed, co-chair of HART

Dr Clare Craig, BMBCh, FRCPath, Diagnostic Pathologist, co-chair of HART

Professor Richard Ennos, MA, PhD. Honorary Professorial Fellow, University of Edinburgh

Professor John Fairclough FRCS FFSEM retired Honorary Consultant Surgeon

Professor Norman Fenton, CEng, CMath, PhD, FBCS, MIET, Professor of Risk Information Management, Queen Mary University of London

**Email** [mail@pjhlaw.co.uk](mailto:mail@pjhlaw.co.uk)  
**Web** [www.pjhlaw.co.uk](http://www.pjhlaw.co.uk)

**Head office**  
18A Maiden Lane,  
Stamford, Lincolnshire,  
PE9 2AZ

**Tel** 01780 757589  
**Fax** 0844 8505806

**Principal**  
Philip Hyland

**Solicitors**  
Liam Pike  
Samantha Crombie  
Joe Hyland

**Lexcel**  
Legal Practice Quality Mark  
Law Society Accredited

PJH Law is authorised and regulated by the Solicitors Regulation Authority under number 571808

Professor Martin Neil, BSc, PhD, Professor of Computer Science and Statistics

Dr David Bell, MBBS, PhD, FRCP(UK), Public Health Physician

Dr Mark A Bell, MBChB, MRCP(UK), FRCEM, Consultant in Emergency Medicine, UK

Dr David Cartland, MBChB, BMedSci, General Practitioner

Dr Peter Chan, BM, MRCS, MRCP, NLP, General Practitioner, Functional Medicine practitioner

Dr Elizabeth Evans, MA(Cantab), MBBS, DRCOG, co-founder UKMFA

Dr John Flack, BPharm, PhD, retired Director of Safety Evaluation at Beecham Pharmaceuticals and retired Senior Vice-president for Drug Discovery SmithKline Beecham

Dr Ali Hagggett, Mental Health community work, 3rd sector, former lecturer in the history of medicine

Mr Anthony Hinton, MB ChB, FRCS, FRCS(Oto), Consultant ENT Surgeon, London

Dr Keith Johnson, BA, DPhil (Oxon), IP Consultant for Diagnostic Testing

Dr Rosamond Jones, MBBS, MD, FRCPCH, retired Consultant Paediatrician

Dr Tanya Klymenko, PhD, FHEA, FIBMS, Senior Lecturer in Biomedical Sciences

Dr Branko Latinkic, BSc, PhD, Molecular Biologist

Dr Ayiesha Malik, MBChB, General Practitioner

Dr Franziska Meuschel, MD, ND, PhD, LFHom, BSEM, Nutritional, Environmental and Integrated Medicine

Dr Alan Mordue, MBChB, FFPH. Retired Consultant in Public Health Medicine & Epidemiology

Dr Rachel Nicholl, PhD, Medical Researcher

Sue Parker-Hall, certified transactional analyst (CTA, psychotherapy); MSc (Counselling & Supervision) MBACP (senior accredited practitioner); EMDR practitioner, Psychotherapist

Rev Dr William J U Philip, MBChB, MRCP, BD, Senior Minister, The Tron Church, Glasgow, formerly Physician specialising in Cardiology

Dr Gerry Quinn, PhD. Postdoctoral Researcher in Microbiology and Immunology

Dr Jon Rogers, MB ChB (Bristol), Retired General Practitioner

I am instructed by the Health Advisory & Recovery Team (HART) to submit an FOIA Request to the MHRA requiring it to produce all data and all information\* that was submitted by AstraZeneca in the application for license of their Covid-19 vaccine (AZD1222/Vaxzevria) and relied upon in granting a Conditional License for use.

\* I am instructed that a full data set and all information are:

1. Pre- and post-authorisation safety and efficacy data for this product.
2. All information that allowed a "rigorous scientific assessment" of all the available evidence of quality, safety and effectiveness by the UK Regulator, the Medicines and Healthcare Product Regulatory Agency (MHRA).
3. All information and full data set that the MHRA stated their expert scientists and clinicians reviewed from the laboratory preclinical studies, clinical trials, manufacturing and quality controls, product sampling and testing of the final vaccine and the conditions for its safe supply and distribution.
4. Anonymised data from their clinical trials

#### Statement on the information

The government has invested millions of taxpayer's monies to develop and market the AstraZeneca vaccine.

Therefore, it would not be in the public interest if the medical and scientific community do not have access to the complete set of AstraZeneca vaccine data and information.

Releasing this data should also enable independent scientists to confirm or otherwise, MHRA's conclusion and often repeated declaration that the AstraZeneca vaccine is 'safe and effective'.

#### Statement on Transparency

FOI 21/1225 - In reply 15.12.21

".....MHRA are committed to transparency".

#### Statement on FOIA

FOIA is to ensure informed citizenry - vital to the functioning of a democratic society, to open the veil of administrative secrecy and to open the agency actions to the light of public scrutiny.

FOIA provides an opportunity to develop a relationship with the public based

on openness and transparency as stated by the Information Commissioner's Office.<sup>1</sup>

***The principle behind the Act is to release information unless there is a good reason not to.***

We believe that the public interest test can be applied to:

Section 41 (Information provided in confidence)

Section 43 (Commercial interests)

and that test is the safety of the nation's health.

2407 people had applied for vaccine injury compensation by August 2022. HMG has now acknowledged that death/serious injury has been caused by Covid-19 vaccination by paying out the first 12 victims from the Vaccine Injury Compensation Program. I also note that Coroners Courts are registering deaths because of Covid-19 vaccination.

Access to the requested records should be granted within 20 business days from the date of receipt of this letter. Failure to respond in a timely manner shall be viewed as a denial of this request and all legal rights are reserved.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Philip Hyland', with a horizontal line underneath.

**Philip Hyland**

**Principal  
PJH Law  
Solicitors**

---

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/refusing-a-request/?q=Section+14>