

RULE 25

REQUEST FOR ADMISSION TO
INQUIRY RECORD

**LIST OF
ADVERSE EVENTS OF SPECIAL INTEREST
RECEIVED BY PFIZER TO
FEBRUARY 28, 2021
(76 days after Canada began using the Pfizer vaccine)**

Date: August 18, 2026

To: Dean Allison, Inquiry Chairperson

From: Shawn Buckley, Inquiry Counsel

Inquiry Rule 25 permits the Chairperson and Inquiry Counsel to jointly agree to admit materials to the Inquiry Record.

This is a request under Inquiry Rule 25 to admit evidence into the Inquiry Record.

Primary Points

By February 28, 2021, there had been 158,893 *voluntary reports* of adverse reactions to the Pfizer vaccine. This included reports of 1,223 deaths.

Pfizer listed 1,283 separate medical conditions for which there were *Adverse Events of Special Interest*. The list is comprehensive, including diverse conditions such as:

neonatal death (baby death)

epileptic aphasia (loss of language due to seizures)

myocardial infarction (heart attacks)

acute respiratory failure

neonatal epileptic seizure (baby epileptic seizure)

Crohn's disease (in both adults and babies)

There are adverse reactions reported to Pfizer *for more than* 1,283 medical conditions. The list of 1,283 separate medical conditions is only the list of *Adverse Events of Special Interest* to Pfizer.

Request to enter documents

This is a request under Inquiry Rule 25 to admit the following into the Inquiry Record:

1. A report prepared by Worldwide Safety for Pfizer called: *5.3.6 CUMULATIVE ANALYSIS OF POST-AUTHORIZATION ADVERSE EVENT REPORTS OF PF-07302048 (BNT162B2) RECEIVED THROUGH 28-FEB-2021*. This document was disclosed by the U.S. Food and Drug Administration (FDA) and bears the FDA index number FDA-CBER-2021-5683 (*Pfizer Adverse Event Report*).
2. A list of 1,283 medical conditions listed as *Adverse Events of Special Interest* in the *Pfizer Adverse Event Report*. This version of the list was prepared by Dr. Charles Hoffe for the B.C. College of Physicians and Surgeons. It is the same as is in the *Pfizer Adverse Event Report* (as Appendix 1), except that the conditions are numbered sequentially and duplicate listings are removed.

Purpose

The *Pfizer Adverse Event Report* was completed on April 30, 2021. It was prepared for the U.S. Food and Drug Administration, which had requested the information from Pfizer.

These documents reveal that as early as April 30, 2021, it was known that there were significant reports of adverse events to a single Covid-19 vaccine. The Pfizer list of *Adverse Events of Special Interest* lists 1,283 separate medical conditions. This is not a complete list of the conditions for which adverse reactions were being reported. Rather, it is only the list of 1,283 separate medical conditions of *Adverse Events of Special Interest* to Pfizer.

The Allison Inquiry has received over 1,000 formal applications to testify by vaccine-injured persons. Most, if not all, of the adverse reactions being reported to the Allison Inquiry are on the list of *Adverse Events of Special Interest* created for Pfizer.

This early confirmation of a broad spectrum of adverse reactions to a Covid-19 vaccine can assist the Panel Members in understanding that reports of Covid-19 vaccine injuries are not predictable, in that they cover a broad spectrum of medical conditions.

These documents are not being entered for the truth of their contents. Rather, they are being entered as a record of what Pfizer reported to regulatory agencies such as the FDA and, presumably, Health Canada in the spring of 2021.

We cannot assume that Health Canada received these documents before they became public in 2023

The *Pfizer Adverse Event Report* was completed on April 30, 2021. It was prepared for the FDA which had requested the information.

In the July 16, 2026 Rule 25 Application on the [Drug Test for Covid-19 Vaccines](#)¹, this Inquiry learned that *Covid-19 vaccines were not proven to be safe or effective when approved* for use in Canada. Indeed, this inquiry learned that the pharmaceutical companies did not even need to submit

their safety data to get approval for use in Canada. Rather, if the pharmaceutical company provided a plan for future disclosure of known safety data, Health Canada could authorize the vaccine for use in Canada, without having received the known safety data.

Because it was not a legal requirement for safety data to be submitted to Health Canada in a timely fashion, we cannot know if Health Canada received this data from Pfizer in the spring of 2021.

These documents were disclosed by the FDA to the public in 2023.

Health Canada has not released similar documents to the Canadian public.

Cautions on use of the Documents

These documents only refer to adverse reactions that were voluntarily reported to Pfizer. They cannot be used to indicate total numbers of adverse reactions that occurred. The *Pfizer Adverse Event Report* lists several limitations to using post-marketing adverse drug event reporting including:

- Reports are submitted voluntarily, and the magnitude of under-reporting is unknown. Some of the factors that may influence whether an event is reported include: length of time since marketing, market share of the drug, publicity about a drug or an AE, seriousness of the reaction, regulatory actions, awareness by health professionals and consumers of adverse drug event reporting, and litigation.
- Because many external factors influence whether or not an AE is reported, the spontaneous reporting system yields reporting proportions not incidence rates. As a result, it is generally not appropriate to make between-drug comparisons using these proportions; the spontaneous reporting system should be used for signal detection rather than hypothesis testing.
- In some reports, clinical information (such as medical history, validation of diagnosis, time from drug use to onset of illness, dose, and use of concomitant drugs) is missing or incomplete, and follow-up information may not be available.
- An accumulation of adverse event reports (AERs) does not necessarily indicate that a particular AE was caused by the drug; rather, the event may be due to an underlying disease or some other factor(s) such as past medical history or concomitant medication.

Agreement to enter evidence into the Record

By signing below I agree that the listed materials should be entered as the following exhibits into the Inquiry Record under Inquiry Rule 25:

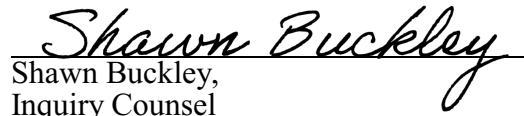
R25-B Rule 25 Application to admit evidence concerning List of Adverse Events of Special Interest Received by Pfizer to February 28, 2021.

- R25-8** A report prepared by Worldwide Safety for Pfizer called: *5.3.6 CUMULATIVE ANALYSIS OF POST-AUTHORIZATION ADVERSE EVENT REPORTS OF PF-07302048 (BNT162B2) RECEIVED THROUGH 28-FEB-2021*. This document was disclosed by the U.S. Food and Drug Administration (FDA) and bears the FDA index number FDA-CBER-2021-5683 (*Pfizer Adverse Event Report*).
- R25-9** A list of 1,283 medical conditions listed as *Adverse Events of Special Interest* in the *Pfizer Adverse Event Report*. This version of the list was prepared by Dr. Charles Hoffe for the B.C. College of Physicians and Surgeons. It is the same as is in the *Pfizer Adverse Event Report* (as Appendix 1) except that the conditions are numbered sequentially and duplicate listings are removed.

Dated August 18, 2026.



Dean Allison,
Inquiry Chairperson



Shawn Buckley,
Inquiry Counsel

Endnote

1. A Rule 25 Application was prepared to show that in Canada, because the Covid-19 vaccines did not need to be proven to be safe, that approval for use could be granted without the known safety data being submitted to Health Canada. This Application and supporting law can be found at <https://covidtestimony.com/exhibits-rule-25/>.