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The research used by EPA to justify ozone regulations does not meet the basic rules for proof of detrimental health effects. They **intentionally** have failed to comply with the basic instruction and intent of the Clean Air Act; they have **intentionally** perpetrated deceptive science and claims of scientific conclusions on the American Public with the intention of misleading them on public policy. That's FRAUD. I have provided my evidence and commentary in the previous submissions distributed by Mr. Yeow.

I assert, based on observing the EPA conduct since the mid-90s, that the agency **intentionally** purged the CASAC and pushed through on a fast track new onerous air regulations, based on unreliable and non-scientific epidemiology that was a tortious and criminal effort, violating the intent and clear language of the Clean Air Act and creating significant burdens on the American public and businesses, that was based in what the EPA **knew** was FRAUDULENT epidemiology and toxicology.

Such actions clearly violate the common and statutory law pertaining to civil and property rights of citizens and business entities as they relate to government regulatory actions. Even if such fraud is committed by government agencies, they are not immunized, they are culpable, and they should be considered answerable by the laws of the United States, appropriate to the nature of the fraud and misconduct, and violation of their oaths as federal employees.

The unfortunate truth is that the EPA has been conducting business with the same malignant and mendacious methods that are fraudulent since the 90s and to the present.

My request is that the CASAC report the matter to the DOJ and ask for an investigation into the questions

1. Does the EPA conduct that ignores basic scientific rules with regards to epidemiological research violate the oath of Federal Employees in their official capacity.
2. Does the cooperation of EPA employees in promoting fraudulent reports on scientific issues go beyond honest mistakes and become an intent to perpetrate a fraud on the American Public and promote misuse of federal funds in matters of EPA responsibilities?
3. If the EPA presents a scientific position that is fraudulent to the public are the officials responsible for that fraud personally responsible for their conduct.
4. If the EPA officials influence grantees to promote the fraud, is that a form of extortion or an exchange of misconduct for something of value—the award of a grant.

5. If EPA officials are involved in what can be established as a collusive lawsuit that misrepresents positions of the parties to the court, is that fraud on the court actionable against the EPA officials involved.

Clean Air Act provisions are clear that EPA epidemiology and toxicology should be used to ascertain risks of harm—that demands good methods that provide some certainty—at what point does an EPA official commit a violation of law or oath of office if that official promotes and agrees to **fraudulent** scientific assertions and the regulations that are promulgated based on that **fraud**.

The EPA 2019 ISA and PA toxicological and epidemiological research fails the basic tests of good science. Associations in uncontrolled population studies may achieve statistical significance, **but that is no measure of proof**—EPA staff know that. Their assertion otherwise is fraud on the public, not fraud from ignorance, but fraud by intent.

EPA staff also **knows** that **claiming statistical significance is proof of causation is a fraud**. P hacking is a fraud and should be discovered and condemned—it is often the tool of researchers to deceive the public that doesn't know better and statistical significance fraud is well used by EPA researchers who do big studies to assure themselves of good p values.

How much **fraud** must be evident before the conduct becomes evidence of a **conspiracy to commit fraud**.

The Lincoln Law, also called the Qui Tam law is intended to allow for a method for citizens to report fraud on the government as the equivalent of whistleblowers. In this matter of the long time fraud of the EPA on the citizens, it may not fit the requirements of the law for me or anyone to report the fraud on the public, because the problem is not a secret—HOWEVER—the point is made. Fraud on the government by non-government entities or government entities is still actionable. Qui Tam provisions are not available to me, a citizen, because I have complained of the fraud by the EPA for years—I have no secret knowledge—I have published and announced it with no restraint.

My point is this, Mr. Chairman—the CASAC has identified a **fraudulent scientific conduct that cannot be attributed to an honest mistake**—it is intentional, violates basic rules of science but it was essential to promoting a political and administrative intent and accomplishing a goal that would not have been achieved absent the fraud.

That is actionable in civil law by those harmed by the fraud. In Criminal law the question is what criminal statutes have been violated.

I don't have the answer to the questions, but I assert that the Chair of the CASAC has an obligation to ask for a **civil and criminal inquiry** on the conduct of the EPA in the matters outlined above and the human experiments that were ignored by the HHS and discarded as insignificant by the National Research Council. I have no confidence in the IG of the HHS,

given the conduct of the IG in the Human Experiments matter, so I would suggest that the complaint should go directly to the DOJ, DC office.