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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **FOR THE COUNTY OF ALAMEDA**

17 CINDY KIEL, J.D., an Executive Associate  
18 Vice Chancellor at UC Davis, MCKENNA  
19 HENDRICKS, a UC Santa Barbara student,  
20 EDGAR DE GRACIA, a UCLA student, and  
21 LELAND VANDERPOEL, an employee at the  
22 Fresno satellite extension of the UCSF Medical  
23 Education Program, and FRANCES OLSEN,  
24 Professor of Law at UCLA,

25 Plaintiffs,

26 vs.

27 THE REGENTS OF THE UNIVERSITY OF  
28 CALIFORNIA, a Corporation, and MICHAEL  
V. DRAKE, in his official capacity as President  
of the UNIVERSITY OF CALIFORNIA,

Defendants.

**CASE NO. HG 20072843**

**THOMAS JEFFERSON'S DECLARATION  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR A PRELIMINARY INJUNCTION**

**UNLIMITED CIVIL JURISDICTION**

**DEPARTMENT 511**

**Date: October 14, 2020**

**Time: 1:30 PM**

**Reservation ID-2206283**

**Action Filed: August 27, 2020**

**Trial Date: None Set**

I, Thomas Jefferson, declare as follows:

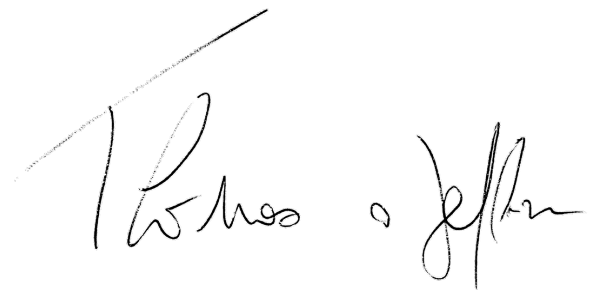
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- 1 1. I submit this declaration in support of Plaintiffs’ Motion for a preliminary injunction. I  
2 have personal knowledge of the facts set forth herein and if called to testify, I could  
3 competently testify as follows:
- 4 2. I hold a MD degree and am a Fellow of Faculty of Public Health on the United Kingdom  
5 and a Member of Royal College of General Practitioners. I am a Senior Clinical Tutor at  
6 the University of Oxford. My specialty is analyzing evidence-based medicine and bias in  
7 drug and vaccines testing.
- 8 3. I am not affiliated with the defendants, plaintiffs, or lawyers involved in this or any other  
9 litigation on this matter and have not received any compensation, either directly or in-  
10 kind, for this affidavit. I am submitting this affidavit because the matter relates to my  
11 area of study and concerns me.
- 12 4. I am the lead author of Cochrane reviews on influenza vaccines, and have published  
13 widely on the topic of influenza vaccines, other vaccines, and public health. The process  
14 of conducting a systematic review involves a systematic, thorough search and critical  
15 assessment of all articles on a given clinical topic. Systematic reviews are a methodology  
16 for reducing bias when appraising the scientific literature and help protect against “cherry  
17 picking.” Systematic reviews are widely regarded as the most trustworthy sources of  
18 information, sitting atop the Evidence-based Medicine Pyramid (Attached as Exhibit “A”  
19 is a copy of my resume.)
- 20 5. Dr. Doshi is a close collaborator of the past 10 years, and we have published many  
21 articles together. He asked me to read his affidavit and file my own affidavit if I agreed  
22 with it. I have read Dr. Doshi’s declaration, and I agree with its contents. I have not read  
23 any other affidavits or documents related to this case.

- 1 6. I agree with the point that randomized clinical trials have not demonstrated that  
2 administration of influenza vaccine reduce the risk of hospitalization or mortality. As  
3 someone who works in the field of evaluating medical evidence and clinical study  
4 evidence, completely agree that the few observational (non-randomized) studies showing  
5 lowered rates of hospitalization are unreliable and inconsistent with the well controlled  
6 clinical trials which have not demonstrated any such reduction.  
7  
8 7. I would like to make the further broader points based on 25 years' of trial research  
9 synthesis: the current influenza vaccines have such low effectiveness that the US CDC  
10 has assigned a negative value to their effectiveness, coercion to use them is ideological.  
11  
12 8. Influenza cannot be ruled out of a differential diagnosis of a presenting respiratory illness  
13 on the basis of vaccination, as the vaccines have low effectiveness and there are hundreds  
14 of other agents which can be produce an identical set of signs and symptoms.  
15  
16 9. I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct and that this declaration was executed on September 15,  
18 2020 in Rome, Italy.

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Thomas Jefferson, MD

CURRICULUM VITAE Thomas Oliver JEFFERSON  
(1 August 2020)

Brief biographies appear in the series "Lifeline" on [The Lancet 2003](#); 361:188. (11 January)  
and in the Feature [Pioneers of Transparency](#) BMJ 2014;350:g7717

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Two most cited papers:

[Guidelines for authors and peer reviewers of economic submissions to the BMJ](#)

MF Drummond, TO Jefferson. BMJ 313 (7052), 275-283 (1720 citations)

[Vaccines for preventing influenza in healthy adults](#)

V Demicheli, T Jefferson, E Ferroni, A Rivetti, C Di Pietrantonj. Cochrane database of systematic reviews (1558 citations)

Key words: Evidence synthesis, Epidemiology, Health Economics, Regulatory data, Market access

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**MEDALS & DECORATIONS**

UNPROFOR Medal (1992)  
 OFFICER (BROTHER) Order of St John of Jerusalem (1994).  
 NATO Medal (Former Yugoslavia Clasp) 1996

**RELEVANT ACADEMIC & PROFESSIONAL QUALIFICATIONS**

Degree in Medicine and Surgery, Pisa University (1979).  
 Diploma of the Royal College of Obstetrician & Gynaecologists UK (DRCOG, 1982).  
 Certificate of Vocational Training in General Practice UK (1984).  
 Membership of the Royal College of General Practitioners UK (MRCGP 1985).  
 Membership of the Chartered Institute of Linguists UK (1985).  
 Diploma in Tropical Medicine & Hygiene UK (London School of Hygiene & Tropical Medicine 1987).  
 MSc Community Medicine UK (London School of Hygiene & Tropical Medicine 1988).  
 Membership of the Faculty of Public Health Medicine UK (MFPHM 1990).  
 Accreditation in Public Health Medicine UK (1990).  
 Accreditation in General Practice UK (1990).  
 Titolo di Scuola di Guerra (1991)  
 Certificate in Health Economics, University of Aberdeen UK (1996).  
 Fellowship of the Faculty of Public Health Medicine UK (FFPHM 1999).

**RECENT and PRESENT ACTIVITIES**

Until November 2019 I provided scientific supervision for the Agenas (Agenzia per i Servizi Sanitari Regionali) HTA programme for non-pharmaceuticals. Agenas is an agency of the Italian MoH. Part of my work entailed supervising a group of 10 researchers and taking responsibility for designing, devising and carrying out HTA and Horizon Scanning assessments. I was scientific lead for the European EUNeHTA Joint Action 2 (Workpackage 4 – devices and diagnostics) project (2012-2015, see below). The EUNeHTA Collaboration is a network of European public agencies producing structured HTA information for national use. In 2021 the Collaboration should become a permanent network funded by the

Commission. I was also scientific coordinator for Workpackage 4 which assessed non pharmaceutical interventions, such as in vitro tests. This involved coordinating some 70 researchers from 28 agencies from 23 countries (from Estonia to Bulgaria, to Greece and Sweden). The project started in 2012 and was completed in 2015. I carried out the same role for the previous EUNeHTA project (Joint Action 1 or JA1 with the European Commission). Until November 2019 I was a member of two different workpackages and a reviewer for two projects in these workpackages as part of the EUNeHTA JA3.

I co-developed a methodology for synthesising evidence of effectiveness, efficiency, safety and resource utilisation using regulatory information and data from different sources, both regulatory and open source. This activity was initially funded by NIHR UK until mid-2015, then the Cochrane Methods Innovations Fund (MIF), NIHR again and since 2016 the Cochrane Nordic Centre. The MIF project was a collaboration to draft advice of when and how to include regulatory material in Cochrane reviews. I am developing this work further by streamlining the use of regulatory data and its incorporation into user friendly, timely reviews.

As part of a team in the Nordic Cochrane Centre we carried out a [systematic review of HPV vaccines](#) based on regulatory documents. The evidence set for the review was assembled by us from a variety of sources into an Index of the human papillomavirus (HPV) vaccine industry clinical study programmes and non-industry funded studies, shortly to be published. At present we are developing the same reviews further with the complete regulatory dataset released by Health Canada after a court case.

Since 2015 I am a Fellow of the Centre for Evidence Based Medicine of the **University of Oxford**, in the UK. I am now Senior Clinical Tutor on the Complex Reviews Module of the MSc in Evidence Based Health course.

I am visiting Professor Visiting Professor Institute of Health & Society at the Faculty of Medicine of Newcastle University (2019-2021).

With the 3 other Cochrane colleagues I am a co-investigator in a John and Laura Arnold Foundation grant for development of a RIAT support centre (2017-2020).

RIAT stands for Restoring Invisible and Abandoned Trials. In short, RIAT is a mechanism that enables researchers to address two long-standing problems in the medical literature: non-publication of trials and misreporting. Our concept was first outlined here: <http://www.bmj.com/content/346/bmj.f2865>

The RIAT Support Center will help accelerate the correction of the scientific record of clinical trials by making it more accurate and more complete.

Finally, with the help of the Cochrane Central Editorial Unit we stabilised of our three long-standing influenza vaccine reviews. These were released in January 2018.

My activity line of regulatory data started with updating of Cochrane review A159 (Neuraminidase Inhibitors for influenza). A159 is currently based exclusively on regulatory information (essentially clinical study reports - CSRs from EMA and comments by FDA and PMDA - about 150K pages in all).

The story is told in:

David Payne. Tamiflu: the battle for secret drug data. BMJ 2012;345:e7303 doi: 10.1136/bmj.e7303 (Published 29 October 2012).  
<http://www.bmj.com/content/345/bmj.e7303>

<http://www.nytimes.com/2013/06/30/business/breaking-the-seal-on-drug-research.html?pagewanted=1&r=3&smid=tw-share>

<http://www.newsweek.com/2014/11/21/medical-science-has-data-problem-284066.html>  
[The pioneers of transparency](#). BMJ 2015;350:g7717 (Published 02 Jan 2015)

I was a member of EMA's Clinical Trials Advisory Group 2 (CTAG2).

I am on the editorial board of [BMJ Evidence Based Medicine](#) (BMJ EBM).

I am an unpaid collaborator to the project *Beyond Transparency in Pharmaceutical Research and Regulation* led by Dalhousie University and funded by the Canadian Institutes of Health Research (2018-2022).

I currently teach on the Complex Reviews module of the MSc in Evidence Based Health Care at Oxford University and currently supervising to MSc students. This involves reviews of regulatory data, economic studies, diagnostic studies, qualitative studies and IPI meta-analyses.

I am a member of the WHO Infection Prevention and Control Research and Development Expert Group for COVID-19.

## **PAST CONSULTANCIES AND OTHER ACTIVITIES**

In the past I have carried out research for the **Ministry of Defence UK** (suite of Cochrane reviews on viral and arthropod borne fevers prevention), **NICE** (HTA of zanamivir for influenza), **Roche** (the economics of antivirals neuraminidase inhibitors), **EU** (systematic review of evidence of safety of MMR vaccines and of the economics of pneumococcal vaccines), **WHO** (systematic review of evidence of safety of Hepatitis B vaccines), **Glaxo SmithKline** (systematic review of evidence of safety and effectiveness of DPT vaccines), **Sanofi- Synhtelabo** (Development of Pleconaril), **Istituto Superiore di Sanita'** and **ASSR** (now Agenas), (coordinator of the national clinical guidelines project) (see below), **Netherlands Health Council** (safety of Hepatitis B vaccine update review), **IMS Health**

(Antidiabetic drugs) the **Piemonte Region** of Northern Italy (suite of Cochrane reviews on influenza vaccines), **Agenzia di Sanita' Pubblica Lazio** - Public Health Agency of Lazio Region (guidelines implementation trial project and coordination of a two cluster randomised trials of guidelines implementation, on behalf of the UK's Technology Assessment Programme I updated two reviews on the effects of editorial peer review. I have been involved in a 5 year update and rewrite of his Cochrane review on Neuraminidase Inhibitors exclusively based on regulatory information. (HTA – 10/80/01 Update and amalgamation of two Cochrane Reviews: neuraminidase inhibitors for preventing and treating influenza in healthy adults and children—<http://www.nets.nihr.ac.uk/projects/hta/108001>).

I am a member of the editorial base of the Cochrane Acute Respiratory Infections Group. Reviewer, Cochrane Infectious Diseases, Acute Respiratory Infections, Hepato-biliary, Airways and Colorectal Cancer Groups.

Director, Health Reviews Ltd, my own company.

Member, editorial, board of *Recenti Progressi in Medicina* and *BMC Health Services Research*.

Peer reviewer for BMJ, Lancet, JAMA, JAMA Internal Medicine, CMAJ, New England Journal of Medicine, Vaccine and Canadian Coordinating Office for Health Technology Assessment (CCOHTA) Emerging Technology bulletins.

I am an Academic Editor, PLOS ONE (2013-17) and have been a contributor to Last's Dictionary of Epidemiology (4<sup>th</sup> edition).

I do anonymous market access consultancy interviews for various pharmaceutical companies.

Between 1996 and 2009 I was the Co-ordinator of the Cochrane Vaccines Field and 1999 and 2012 I was honorary Research Fellow at the UK Cochrane Centre.

In 2011-13, I acted as an expert witness in a litigation case related to the antiviral oseltamivir, in two litigation cases on potential vaccine-related damage and in a labour case on influenza vaccines in healthcare workers in Canada. In 2016-17 I was a member of an independent data monitoring committee for a **Sanofi Pasteur** clinical trial on an influenza vaccine and a member of three advisory boards for **Boehringer Ingelheim** (on bronchodilator drug), Takeda (cardiovascular drug) and Bayer (blood replacement).

As part of my [HTA activity](#) I have interviewed, collaborated and interacted with scores of clinicians in both primary and hospital care both in Italy and the rest of Europe. Over the past thirty years, I have worked in most therapeutic and prevention areas. Also as part of my Italian HTA and scientific activity I have interacted with patient organisations and have considerable knowledge of the regional Italian structure and its workings thanks to my role as consultant to Agenas.



The HTA report output is accessible at: <https://www.agenas.gov.it/aree-tematiche/hta-health-technology-assessment/attivita-hta/report-hta>

The Horizon scanning output is accessible at: <https://www.agenas.gov.it/aree-tematiche/hta-health-technology-assessment/hs-horizon-scanning/report-hs>

Since 2017 I am a member of the Italian MoH National Immunisation Technical Advisory Group (NITAG).

## **GENERAL PERSONAL & PROFESSIONAL BACKGROUND**

I was born on 31 March 1954 in Viareggio (near Pisa), Italy. I was educated in Italy and went to UK in 1980 to do my hospital jobs prior to joining the Army. My professional career has spanned two specialties, General Practice (1980-1985) and Public Health (since 1986). I served in the British Army between 1981 and 1999.

My Army service took place in three continents and two conflicts (South Atlantic and Yugoslavia). I held the rank of Lieutenant Colonel. I am married with five children.

## **GENERAL PRACTICE CAREER**

SHO Medicine, Arbroath Infirmary (1980 - 1981).

SHO Casualty, Croydon (1981).

Post Graduate Medical Officers' Course held Royal Military Academy, Sandhurst and the Royal Army Medical College, London (1981).

SHO O&G, British Military Hospital Hong Kong (1982).

Trainee GP and Regimental Medical Officer in several Gurkha units in Hong Kong and Nepal (1982 - 1984).

GP principal at Royal Military Academy Sandhurst, Armoured Regiment in Germany and Gurkha Battalion in UK and South Atlantic (1984 -1986).

Staff officer (various roles, 1987-1999)

Partner (part-time), North Lane Practice, Aldershot, Hampshire (1999-2001).

## **PUBLIC HEALTH CAREER**

Registrar at the Department of Preventive Medicine at the Royal Army Medical College London (1987-1990).

Honorary Lecturer to the Department of Public Health at King's College Hospital, London (Professors Jim McEwen Norman Noah, 1989 - 1996).

Honorary Senior Lecturer to the Department of Public Health at King's College Hospital, London (1997 - current).

Detachment to the London School of Hygiene and Tropical Medicine on the Diploma in Tropical Medicine and Hygiene Course first and then on Master of Science in Community Medicine (1987- 1988).

Senior Registrar at the RAMC Training Centre near Aldershot (1988 - 1990). Student on the Higher Command and Staff Course at the Italian Army Staff College, Rome (1990 - 1991).

Second in Command of a Medical Battalion in Germany consisting of 250 personnel (1991 - 1992).

Assistant Force Medical Officer, United Nations Protection Force in Yugoslavia (UNPROFOR). I set up all medical facilities for the initial deployment in March 1992 and Director of Public Health for UNPROFOR. I was stationed in Sarajevo (Bosnia- Hercegovina), Belgrade (Serbia) and Zagreb (Croatia) for the duration of six months. Deputy Commander Medical (Preventive Medicine) British Army of the Rhine. I was responsible for all Preventive Medicine services for a population of 120.000 souls (1992-93).

Senior Technical Officer on the Health Services Market Test for British Forces Germany (1993-94). Responsible for developing the Statement of Requirement in preparation for the issuing of the Invitation To Tender and the developing of the purchasing function. Staff Officer, Ministry of Defence, Army Medical Directorate (1994-99). Responsible for health surveillance and health policy formulation for the British Army. My department carried out morbidity surveillance for the British Army and for the NATO SFOR mission in the Former Republic of Yugoslavia (FRY).

In February 1994 I was appointed Visiting Professor in Health Services Research at the University of Pavia, Northern Italy.

In June 1997 I was appointed Edmund Parkes Professor of Preventive Medicine at the Royal Defence Medical College. The chair is recognised by the Faculty of Public Health Medicine of the Royal College of Physicians of the United Kingdom. Additional responsibilities included the strategic management of the Army's 90-strong Environmental Health cadre. This lapsed when I left the Army.

Principal in family medicine, Aldershot, UK, 1999-2001.

British Medical Association HC Roscoe Fellow for the study of the prevention and treatment of the common cold (2000-2002).

Adviser the Lazio Region Public Health Agency (IT) and the Istituto Superiore di Sanità (on the development of evidence-based clinical guidelines) 2001-2005

## **PRIZES**

1982 Army Syntex Award for research into obstetric performance in different ethnic groups (see publication 5).

1984 University of Surrey Research Prize for work on haematological indices of pregnant Gurkha women (see publication 6).

1990 Parkes Memorial Prize for work on the selection and training of Army recruits (see publications 17 e 22).

2009 BMJ prize for best use of BMJ archival material (publication 232)

### **Past grants:**

MOD(UK) - systematic reviews of interventions to prevent influenza in healthy adults

Roche UK Ltd - cost of illness study of the burden of influenza.

BMA Roscoe Fellowship - systematic review of the effects of antivirals for the common cold.

UK HTA programme - systematic review of the effects of zanamavir.

EU - systematic review of safety of MMR vaccines.

EU - systematic review of the economics of pneumococcal vaccines.

WHO - systematic review of evidence of safety of Hepatitis B vaccines.

WHO - systematic review of evidence of safety of aluminium in DTP vaccines.

Glaxo SmithKline Ltd - systematic review of evidence of safety and effectiveness of DPT vaccines.

NHS R&D programme - systematic review of the effects of peer review. An update was commissioned in May 2004.

Regione Piemonte, Italy – systematic reviews of the effects of influenza vaccines in children and elderly and quality studies and their publication on high impact factor journals.

Netherlands Health Council (safety of Hepatitis B vaccine update review)

DH (UK)/NIHR Cochrane review update incentive scheme (several awards)

Lazio Public Health Agency – systematic review of the epidemiology of *S.Pneumoniae*

DH (UK) National coordinating Centre for Methodology

WHO - Physical interventions to interrupt or reduce the spread of respiratory viruses: systematic review .

UK NIHR – Developing, updating and rewriting the Cochrane review on Neuraminidase Inhibitors exclusively based on regulatory information.

Cochrane - Methods Innovation Fund (MIF) 2014-17 to develop a methodology for summing up evidence of effectiveness, efficiency and safety using regulatory information and data from different sources, both regulatory and open source.

Arnold Foundation – RIAT centre

## **RECREATIONAL ACTIVITIES**

Weight training, skiing.

## **MEMBERSHIP OF OTHER ORGANISATIONS (past and present)**

Health Economics Study Group (HESG)

International Association of Health Economists (listed in the world directory of Health Economists).

Cochrane Airways Collaborative Review Group

LOCKNET (JAMA/BMJ peer-review network).

World Association of Medical Editors (WAME)

Health Technology Assessment International (international society for HTA)

## **PUBLICATIONS & REPORTS**

1. CAROLI G, JEFFERSON T O. Wedding Party with S.Haifa. Annali Sclavo. 1978; 20: 959-962.
2. CAROLI G, JEFFERSON T O. Finding of E.Coli Phage in Urinary Tract Infections. Annali Sclavo. 1980; 22: 857-860.
3. JEFFERSON T O. Personal View. BMJ. 1982; 284: 1328.
4. JEFFERSON T O, COHEN C. Familial Siringomyelia with Mental Impairment. J R Army Med Corps. 1982; 128: 41-42.
5. JEFFERSON T O, REIDY A J. Incidence of Instrumental Deliveries in Primigravidae of 3 Different Ethnic Groups. J R Army Med Corps. 1983; 129: 46-47.
6. REIDY A J, JEFFERSON T O, KENNEDY P M D. Some Haematological Data on Pregnant Gurkha Women. J R Army Med Corps. 1984; 130: 20-21.

7. JEFFERSON T O. Physical Fitness and Smoking Patterns in a Gurkha Battalion. J R. Army Med Corps. 1986; 132: 168-172.
8. JEFFERSON T O, RASOR P A. Non Simulated Casualty Workload in 2 Field Hospital During Exercise "Bold Gannett". Giornale di Medicina Militare. 1985; 135: 265-268.
9. JEFFERSON T O, TAYLOR V M. Perinatal mortality in infants of two different ethnic groups. Family Practice 1985; 2:175-176.
10. JEFFERSON T O. (Anonymous) Mea culpa. Update. 1985; 31: 932.
11. JEFFERSON T O. Patterns of smoking in 2 infantry battalions. British Army Review. 1986; 82: 84.
12. JEFFERSON T O. A Camera in general practice (Ota's Naevus). Update. 1987; 35: 237.
13. KENNEDY P M D, JEFFERSON T O, REIDY A J. Growth in Gurkha Infants. Family Practice. 1986; 3: 54.
14. JEFFERSON T O. Buon Natale (Letter to the Editor). J Royal Coll Gen Pract. 1986: 291.
15. OLLIER W, FENSTENSTEIN, JEFFERSON T O. HLA Antigens in Nepalese. Proceedings of the 3rd Asian Oceania Histocompatibility Conference, Sapporo 1986.
16. JEFFERSON T O. The Prevention of AIDS: Some Principles for the Inception and Assessment of a Health Education Campaign. Rivista Italiana d'Igiene 1988; 48: 3-11.
17. JEFFERSON T O. An Investigation of Medical Discharges from the British Army 1979-1986. J R Army Med Corps. 1989; 135: 115-123.
18. JEFFERSON T O, BRAND H, LEVRE` E, CAROLI G. The Personal Prevention of Malaria. Rivista Italiana d'Igiene 1989; 430: 443-450.
19. JEFFERSON T O, CAROLI G, MOLINARI G, PEIRONE A P. Public Health and Community Medicine in England. Rivista Italiana d'Igiene 1989; 49: 226-238.
20. BASNET I, HADYAPANIOTOU C, JEFFERSON T O, MILLS A. Abortion Services in Wandsworth (MSc Field Service Attachment). London School of Hygiene & Tropical Medicine, 1988.
21. TAYLOR L E, JEFFERSON T O, CAROLI G. Water Supply Engineering and Public Health in the United Kingdom. Rivista Italiana d'Igiene 1990; 50: 81-93.

22. JEFFERSON T O. An Investigation into Regular Recruit Wastage from the British Army, 1988. J R Army Med Corps 1990; 136: 138-145.
23. TAYLOR L E, JEFFERSON T O, CAROLI G. The Water Supply of London. Rivista Italiana d'Igiene. 1990; 3-4: 169-177.
24. DEMICHELI V, JEFFERSON T O, AMPOLA M, CAROLI G, PEIRONE A P. Il Lay Belief System. Nota 1: Lo Studio del Comportamento Sanitario. Rivista Italiana d'Igiene 1990; 3-4: 134-150.
25. JEFFERSON T O, DEMICHELI V, CAROLI G. Nesso tra Casi di Leucemia Infantile e Centrale Nucleare di Sellafield (U K): un Puzzle Epidemiologico. Rivista Italiana d'Igiene 1990 3-4: 178-191.
26. DEMICHELI V, JEFFERSON T O. Le Conseguenze Economiche della Salmonellosi. Antibioticoterapia per la pratica. 1991; 2: 73-81.
27. JEFFERSON T O. First Aid Training. An Appraisal. The Soldier's Longest Journey. J R Army Med Corps. 1991; 137: 27-30.
28. JEFFERSON T O. Procedures for the collection and bottling of mineral waters - Guidelines for handlers. Rivista Italiana d'Igiene 1990; 5-6: 496-8.
29. BISOGNI L, JEFFERSON T O, DEMICHELI V, LOMOLINO G, PACELLI G. Studio della prevalenza delle infezioni ospedaliere in un ospedale generale di zona. Rivista Italian di Antibioticoterapia per la pratica 1991; 4: 159-63.
30. DEMICHELI V, LOMOLINO G, JEFFERSON T O. Audit nei servizi di Igiene Pubblica: l'opinione dei cittadini sugli interventi per inconvenienti igienici. Atti del IV Congresso Nazionale della Societa` Italiana di VRQ, Pavia 22-25 Settembre 1991, pagina 66. Editrice Periodici 1991.
31. DEMICHELI V, LOMOLINO G, JEFFERSON T O. La qualita` delle iniziative di formazione: l'aggiornamento del personale sul problema delle infezioni ospedaliere. Atti del IV Congresso Nazionale della Societa` Italiana di VRQ, Pavia 22-25 Settembre 1991, pagina 81. Editrice Periodici 1991.
32. DEMICHELI V, LOMOLINO G, JEFFERSON T O. L'apporto della Economia Sanitaria alla qualita` delle decisioni. La determinazione del costo della sofferenza. Atti del IV Congresso Nazionale della Societa` Italiana di VRQ, Pavia 22-25 Settembre 1991, pagina 106. Editrice Periodici 1991.
33. DEMICHELI V, LOMOLINO G, JEFFERSON T O. Affermazioni di consenso e verifica della qualita`. Atti del IV Congresso Nazionale della Societa` Italiana di VRQ, Pavia 22-25 Settembre 1991, pagina 107. Editrice Periodici 1991.

34. DEMICHELI V, JEFFERSON T O. Cost-benefit analysis of the introduction of mass vaccination against Hepatitis B in Italy. *Journal of Public Health Medicine* 1992; 4: 367-375. (Paper presented to the third European Health Services Research Meeting - University College London, 13 - 14 December 1991).
35. DEMICHELI V, JEFFERSON T O. Manuale di Programmazione e organizzazione Sanitaria. Quaderni di Epidemiologia 17. La Goliardica Pavese, Pavia 1992.
36. DEMICHELI V, JEFFERSON T O. Criteri di valutazione del nesso causale e loro applicazione alla questione delle relazioni fra le radiazioni ionizzanti e la leucemia infantile. *Tecnica Sanitaria* 1993 (in press).
37. JEFFERSON T O, DEMICHELI V, LOMOLINO G. Problemi di Valutazione epidemiologica nelle piccole catastrofi ambientali. Il caso di Camelford in Cornovaglia. *Tecnica Sanitaria* 1993 (in press).
38. JEFFERSON T O. Public Health Aspects of the war in Yugoslavia. *Public Health* 1993; 107: 75-8.
39. JEFFERSON T O, DEMICHELI V, WRIGHT D A. An economic evaluation of the introduction of vaccination against Hepatitis A in a peace-keeping operation. The case of the United Nations Protection Force in Yugoslavia (UNPROFOR). *International Journal of Technology Assessment in Health Care* 1994; 10:490-97. Poster presented at the Fifth European Health Services Research Conference at Maastricht, (December 1993).
40. DEMICHELI V, LOMOLINO G, JEFFERSON T O. Audit of an environmental service in Italy. *Proceedings of the Summer Conference of the Faculty of Public Health Medicine*, 1992, Eastbourne, Sussex, Inghilterra.
41. JEFFERSON T O, DEMICHELI V. The costs of disease - a look at world literature. Presented at the "Meeting Internazionale sui costi delle malattie e della Salmonellosi", Pavia University (5-6 April 1993) (in press).
42. JEFFERSON T O, DEMICHELI V. Is vaccination against Hepatitis A and B cost-effective? A preliminary look at world literature. Presented at the "Meeting Internazionale sui costi delle malattie e della Salmonellosi", Pavia University (5-6 April 1993) (in press).
43. JEFFERSON T O, DEMICHELI V. Is vaccination against Hepatitis B efficient? A review of world literature. *Health Economics* 1994; 3:25-37. Paper presented at the Fifth European Health Services Research Conference at Maastricht, (December 1993).
44. JEFFERSON T O. Public Health and the war in Yugoslavia. In McKee M (ed): *Health for all in a changing Europe*. HFA 2000 News 1993; 25:4-5.

45. DEMICHELI V, JEFFERSON T O. Cost-benefit analysis of the introduction of mass vaccination against Hepatitis B in Italy (letter to the Editor). *Journal of Public Health Medicine* 1993; 14: 289-290.
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Rome, 1 August 2020



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