

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION

MARK CHANGIZI, MICHAEL SENGER
and DANIEL KOTZIN,

Plaintiffs,

v.

Civil Action No.: 2:22-cv-1776

DEPARTMENT OF HEALTH AND
HUMAN SERVICES, et al.,

Defendants.

DECLARATION OF MARK CHANGIZI

1. I, Mark Changizi, am over the age of 18 and make this Declaration in support of my complaint against the Department of Health and Homeland Security, President Joseph Biden, and the Department of Homeland Security.

2. I live in Columbus, Ohio.

3. I make this Declaration based on personal knowledge.

4. I am a broadly trained scientist (math/physics undergrad, PhD in math, postdocs in psychology and theoretical neuroscience) and have been a researcher in a variety of fields for 25 years. For more than 15 years I have been a public-facing scientist -- I write for magazines, appear on science TV shows, speak worldwide, do a YouTube series, and have six books on my research.

5. Historically apolitical, when Covid entered the picture I realized there were many deep misunderstandings of the data and evidence leading to panicked decisions being made, and I endeavored to explain what the evidence actually says.

6. Furthermore, as someone with expertise on psychology and the evolution of culture, I have also been spending considerable effort communicating emergent societal phenomena, the illogical biases humans have (on both sides of the Covid debate), and the importance of free expression in society (the subject of my institute, Free Expression Group).

7. I have approximately 37,000 followers on Twitter, having created my account in April 2013.

8. Since March of 2020, my Twitter account focused upon criticizing the societal and governmental responses to COVID-19, and trying to explain why they were misguided.

9. Many of my Tweets were extremely controversial, particularly at the time, but I was never suspended for any of them.

10. I tweeted on March 17, 2020, for example: “the moral of coronavirus19 will be that social contagion via social networks is more dangerous than biological contagion” (Attachment 1).

11. On April 27, 2020 I tweeted that “Lockdowns were NOT common sense measures. They were hysterical reactions out of fear” (Attachment 2).

12. On May 24, 2020 I tweeted: “The Lockdown religious cult. Believed initially on faith (“common sense”); impervious to evidence they did nothing; Demand that all else must be sacrificed; Requires unrelenting devotion and asceticism; Promises forever life; Moral outrage for any who protest” (Attachment 3).

13. On July 23, 2020, I tweeted “New study a TOTAL surprise to sufferers of The Illusion of Control. ‘Rapid border closures, full lockdowns, & wide-spread testing were not associated with COVID-19 mortality per million people’” (Attachment 4).

14. On September 9, 2020, I tweeted that the infection fatality rate for the flu in the United States ranges from 0.1% to 0.18%, while COVID was in the range of 0.1% to 0.3% (Attachment 5).

15. On November 21, 2020 I tweeted “Breaking: Another study finds no benefit from lockdowns” (Attachment 6).

16. On December 2, 2020, I tweeted that “ASYMPTOMATIC TRANSMISSION RATE. Transmission rate increased with the severity of index cases,” and cited some statistics (Attachment 7).

17. That same day, I tweeted that covid “spread via smoke like aerosols” which is “why masks are useless” (Attachment 8).

18. On April 20, 2021, I received my first 12-hour suspension for linking to an article on the safety and efficacy of face masks, an article housed at the NIH web site. The following tweet was cited as cause:

New Review: Masks Ineffective, Harmful. “The existing scientific evidence challenges the safety and efficacy of wearing facemask as preventive intervention for COVID-19” (Attachment 9).

19. On approximately June 25, 2021, I received a 7-day suspension, and the email from Twitter just had blank spaces where the usual offending material would be, so I was never sure why I was suspended.

20. Around December 1, 2021, I learned my account was being heavily censored and deboosted (this means, among other things, that the user's tweets are de-platformed—they appear in Twitter feeds much less frequently and replies to other posts may be hidden).

21. First, I had noticed that I was no longer gaining followers, and my engagement had fallen precipitously.

22. Second, followers reported to me that they were no longer seeing my tweets, and that when they searched for me I would either not come up or appear only when the final letter was added, and -- if they did find me via a search -- that my account was labeled as “sensitive” and required accepting a warning in order to view the content.

23. I was permanently suspended on December 18, 2021, again for “spreading misleading and potentially harmful information related to COVID-19.” The following two tweets were cited as the cause (Attachment 10):

- a. “Covid is 10 to 20 times less dangerous than flu for kids. Get. A. Grip. There is NO long term data for the shot. And even the short and medium term data for that age group are ambiguous at best.”
- b. “Asymptomatics rarely spread it ~ Vaccinations don't slow spread ~ unvaxxed pose no threat to vaxxed ~ Risks are broadly flu like (and safer than flu for < 40) ~ Huge % of unvaxxed have superior natural immunity via recovery.”

24. The email warned me that any “attempt to evade a permanent suspension by creating new accounts” would result in suspension of those accounts.

25. I appealed the suspension on Christmas Day of 2021. I wrote that:

You have permanently suspended me for speaking out as a scientist concerning the evidence-based dangers of Covid and the efficacy & ethics of the interventions.

Ironically, I am one of the few scientists studying the importance of free expression, and how it is an absolutely crucial part of the mechanism society — and science — uses to stumble toward the truth.

I am an academic with a number of well-known discoveries, my sixth book appearing in a few months, and am also perhaps the only person arguing against the interventions that understands there was no “pandemic,” and has tried to educate people against their bias toward conspiracy-theory thinking.

You have made a huge mistake in suspending so many voices, including mine.

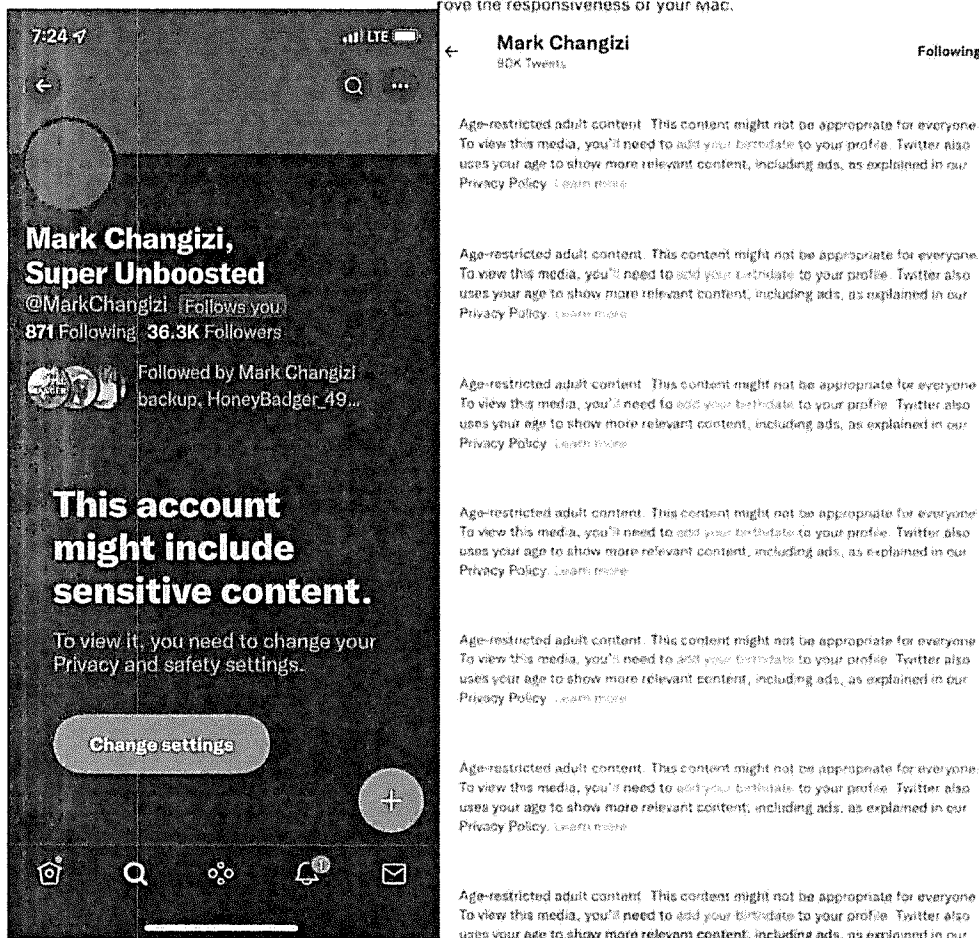
And, that is true whether or not what we’re saying is true! Of course, I believe my statements are true, and always provide argument & evidence. Remember: nearly every journal article in the academic literature is false. But that doesn’t mean it gets cancelled. It is part of the truth-discovery process itself.

Don’t become part of the problem by encouraging censorship and groupthink.

26. On December 27, 2021, Twitter unsuspending me without explanation, although I had to delete two Tweets (see 9a and 9b) to regain access to my account.

27. Nevertheless, my account is heavily censored: my Tweets are typically labeled “age-restricted adult content” that require an explicit effort to read them (in contrast to the vast majority of Twitter accounts). I still do not occur in a search unless my name is fully typed, and the same is true of my Instagram account (Attachment 11).

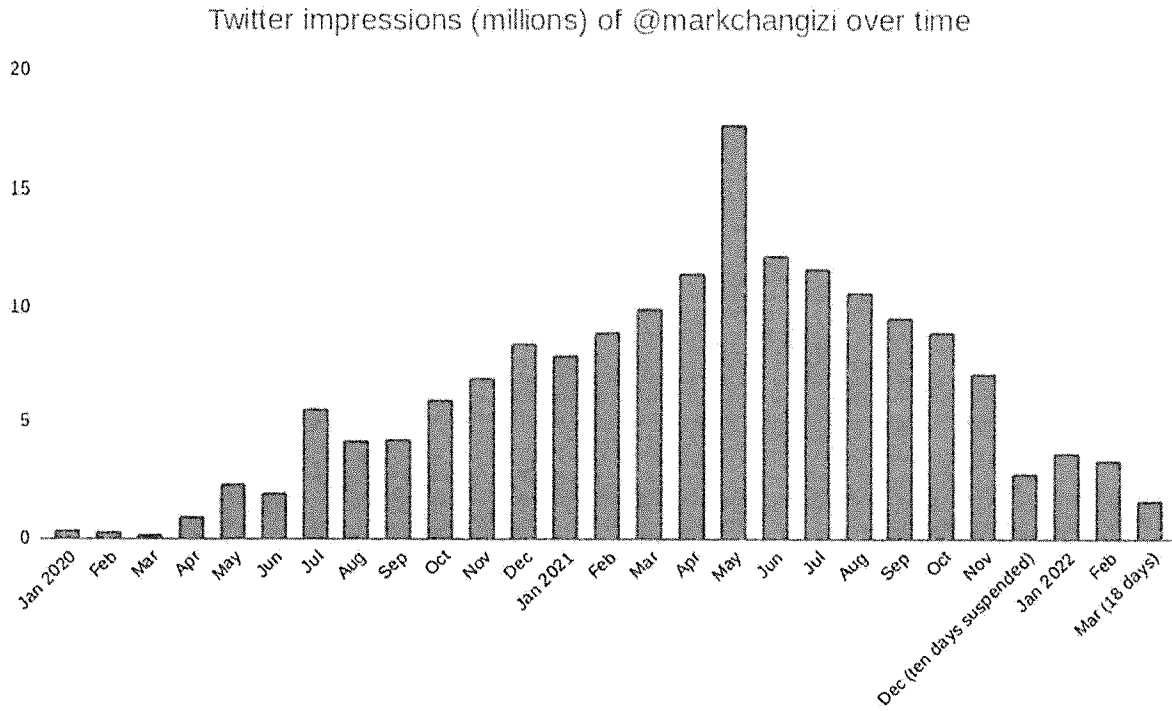
28. By November to December of 2021 others began telling me that my account was being labeled as “sensitive content” (below, left) and my tweets were labeled as sensitive (below, right).



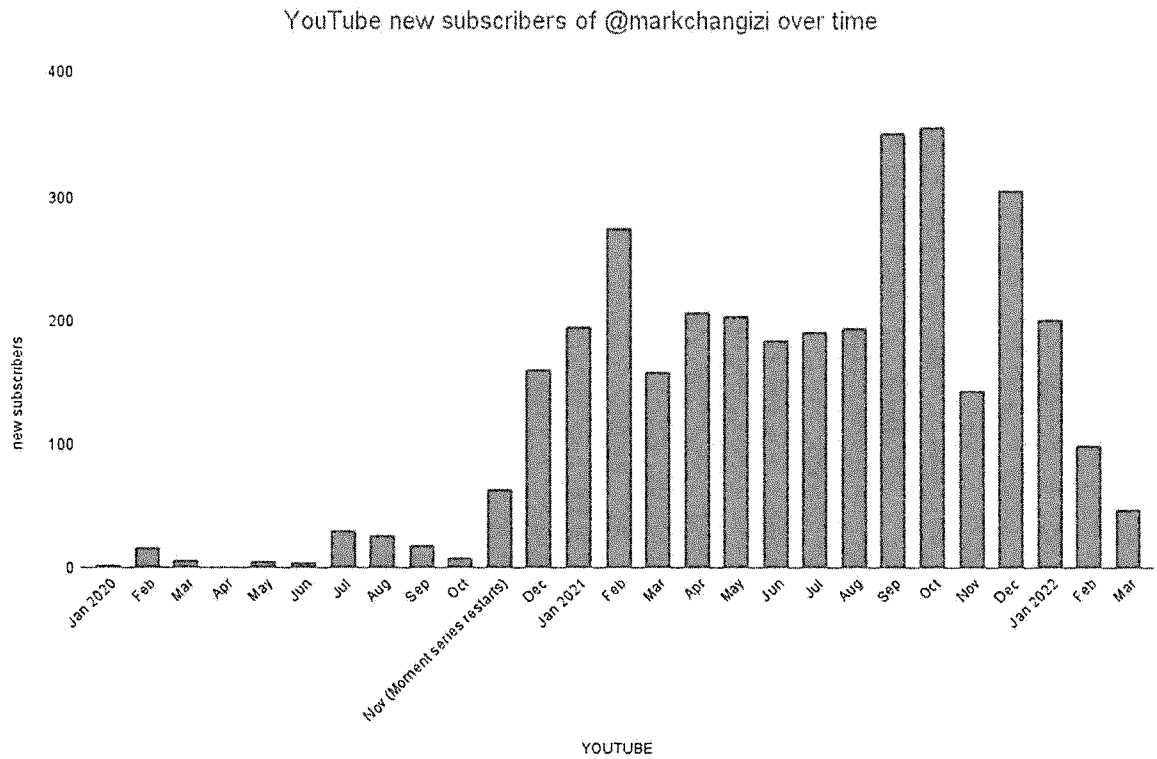
29. Through these (and presumably other in-house mechanisms of censoring my account), my monthly Twitter impressions (the number of times someone sees my posts) precipitously fell, as can be seen below in a graph of monthly impressions from January 2020 until the time of this writing.

30. Although I began noticing my general de-platforming around December of 2021, it had actually begun significantly earlier, around May of 2021 (as can be seen in the graph below). My

activity (number of tweets) did not wane during this period.








31. My follower-ships at YouTube also plateaued and reversed despite the fact that I was very active, and prior to the censorship period had steadily gained followers (see graph below).

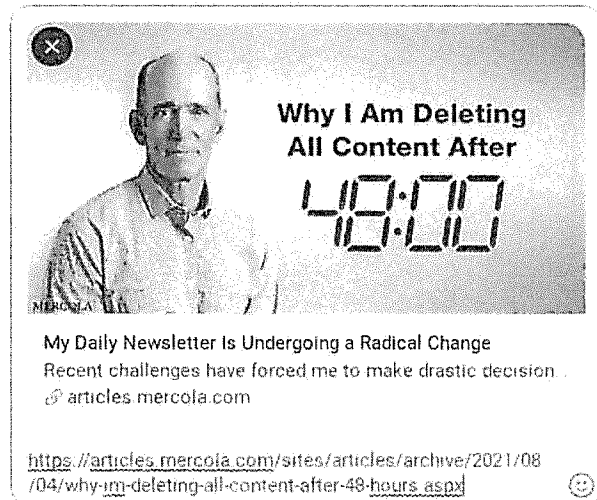



32. Twitter is also censoring my direct messages, which are non-public messages between specific users of Twitter.

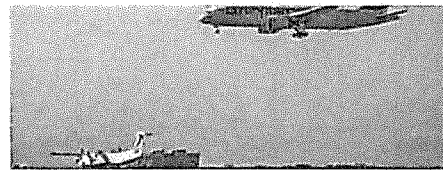
33. The first screenshot below shows my direct message before clicking “send”. The second screenshot shows what one sees after clicking “send”: Twitter prevented me from sending the link, as one can see in the temporary blue message and red “failed to send” state of the DM. This DM

censorship occurred in early August, 2021.

-  **Unbekoming** @Unbekoming 11h
Thank you!
-  **Gregory Cook, Kurt Schlichter, Charlie ...** 11h
You reacted to @Gregory58073966's T...
-  **Brent Jeffcoat** @BrentJeffcoat 11h
Definitely.
-  **#PureAwarenessOWL #FirstDoNoHarm #13h**
Shared a Tweet
-  **john watson** @jdwatsonii 14h
If Florida REALLY has outlawed vax pas...




-  **Unbekoming** @Unbekoming 11h
Thank you!
-  **Gregory Cook, Kurt Schlichter, Charlie ...** 11h
You reacted to @Gregory58073966's T...
-  **Brent Jeffcoat** @BrentJeffcoat 11h
Definitely
-  **#PureAwarenessOWL #FirstDoNoHarm #13h**
Shared a Tweet





Africa must remove barriers to flying to secure post-pandemic boom, says IATA regional exec
cnn.com

Mommar 2:37 AM

<https://articles.mercola.com/sites/articles/archive/2021/08/04/why-im-deleting-all-content-after-48-hours.aspx>

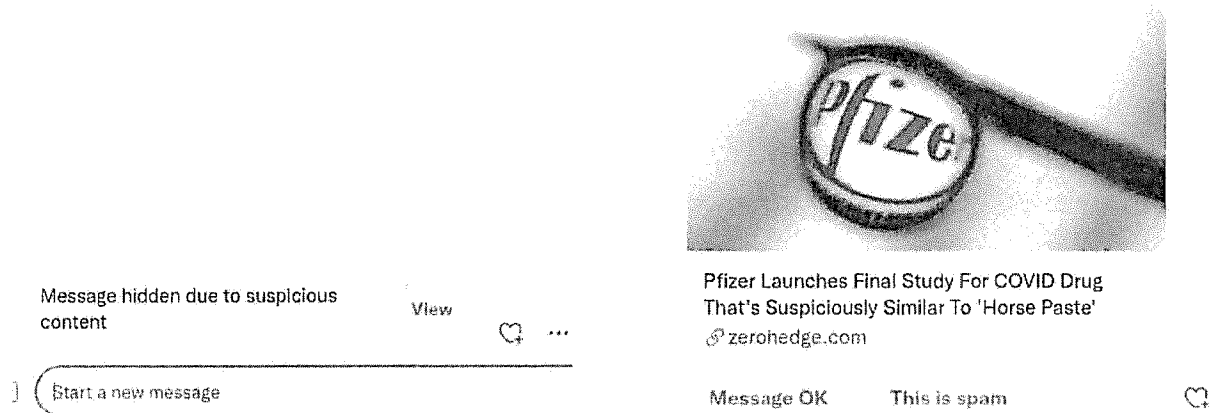
 This request looks like it might be automated. To protect our users from spam and other malicious activity, we can't complete this action right now. Please try again later.

Message failed to send
Delete for you · Try again

  Start a new message

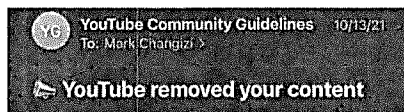
34. Twitter also censors direct messages in a distinct fashion, labeling the message “suspicious” (first image below) and requiring one to click through to see the actual message

(second image). This DM censorship occurred around the first of October, 2021.



35. Censorship in Twitter's DMs were a surprise to all of us at Twitter. We had not ever seen censorship among our private messages in the decade plus years before then.

36. Two of my YouTube videos have been censored, one on the meaning of the Precautionary Principle (left), and the other on the evolution of political purity tests (right).



Hi Mark Changizi,

Our team has reviewed your content, and, unfortunately, we think it violates our **medical misinformation policy**. We've removed the following content from YouTube.

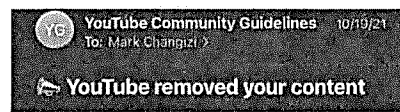
Video: Moment 113. The Precautionary Principle Demands YOU Show They're Safe and Effective



We know that this might be disappointing, but it's important to us that YouTube is a safe place for all. If content breaks our rules, we remove it. If you think we've made a mistake, you can appeal and we'll take another look. Keep reading for more details.

How your content violated the policy

YouTube doesn't allow content that explicitly disputes the efficacy of local health authorities' or World Health Organization (WHO) guidance on social distancing and self isolation that may lead people to act against that guidance.



Hi Mark Changizi,

Our team has reviewed your content, and, unfortunately, we think it violates our **medical misinformation policy**. We've removed the following content from YouTube.

Video: Masks and vax mandates are political purity tests banishing the unclean enemy. Moment 115

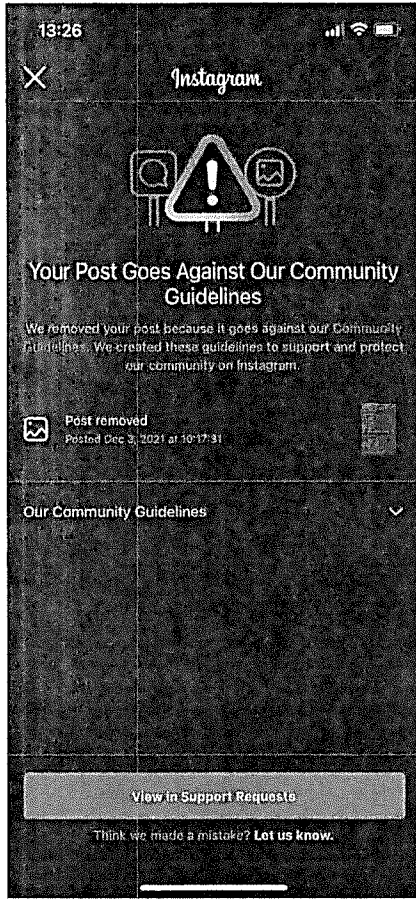


We know that this might be disappointing, but it's important to us that YouTube is a safe place for all. If content breaks our rules, we remove it. If you think we've made a mistake, you can appeal and we'll take another look. Keep reading for more details.

How your content violated the policy

YouTube does not allow content that spreads medical misinformation that contradicts local health authorities' or the World Health Organization (WHO) medical information about COVID-19. Learn more [here](#).

37. One of my posts at Instagram was taken down on December 6, 2021. The post cited the infection fatality rate of Covid for each age bracket, and compared it with that of flu.



Infection fatality rate

0-19:	0.0027%
20-29:	0.014%
30-39:	0.031%
40-49:	0.082%
50-59:	0.27%
60-69:	0.59%
70+:	5.5%
70+:	2.4% among non-institutional

	COVID19	FLU
0-19:	0.003%	0.01%
20-49:	0.02%	0.02%
50-69:	0.5%	0.1%
70+:	5%	1%

38. I have become very careful about what I say on Twitter and YouTube (and Facebook and Instagram) to avoid suspension.

39. For example, I never discuss early treatments, as that leads to immediate suspensions.

40. I avoid linking to studies and make very general statements when referring to the vaccines and early treatments, which make my Tweets more difficult to comprehend.

41. I fear engaging with the opposition because angry opponents may report me to Twitter, increasing the chances of suspension.

42. I have documented my belief that the Government is heavily involved in, if not responsible for, big tech censorship.

43. On January 5, 2021 I tweeted that "IT'S ACTUALLY GOVERNMENT CENSORSHIP. Much of the reason why big tech is engaged in censorship is pressure from government itself, and

so the premiss [*sic*] at the start of this thread is false. They're not acting as a private company, but are a de facto arm of the state" (Attachment 12).

44. I tweeted a video of Press Secretary Jen Psaki's May 5, 2021 speech on that date, and remarked: FREE EXPRESSION ALERT! Amazing! She specifically threatens Big Tech here to censor or risk greater regulation" (Attachment 13).

45. I wrote an article in July 5, 2021 entitled "Big Tech Censorship is Actually Government Censorship." Available at <https://www.getrevue.co/profile/markchangizi/issues/big-tech-censorship-is-actually-government-censorship-597190>. I cited Jen Psaki's May 5, 2021 talk, and concluded that "[i]t's government censorship, plain and simple."

46. On September 20, 2021 I Tweeted Psaki's statement that "You shouldn't be banned from one platform and not others for providing misinformation" and commented "Your federal government who is totally not directing Big Tech censorship and thereby violating the First Amendment" (Attachment 14).

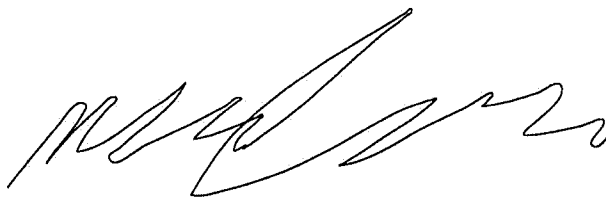
47. I use a wide variety of tech platforms, including Twitter, YouTube, Facebook, Instagram, Google, Signal, Telegram, Messenger, Amazon, Whatsapp, GETTR, Gab, Parler, TruthSocial.

48. I have always been under the assumption that my information is private, and certainly not available to the government without a warrant.

49. Twitter notoriously suspends only those who question the wisdom and efficacy of government restrictions, or who cast doubt on the safety or efficacy of the vaccines.

50. Upon information and belief, there are no examples of Twitter suspending individuals who have spread misinformation from the other side—by, for example, exaggerating the efficacy of masks or the threat the virus poses to children.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'Mark Changizi', written in a cursive style.

Executed On: May 17, 2022

Mark Changizi

ATTACHMENT 1



Mark Changizi
@MarkChangizi

The moral of coronavirus19 will be that social contagion via social networks is more dangerous than biological contagion.

15:21 · 3/17/20 · Twitter Web App

|| View Tweet activity

ATTACHMENT 2

Lockdowns were NOT common sense measures. They were hysterical reactions out of fear.

Here are 15 of just some of the reasons why it was not common sense. (I'm not including all the reasons we have NOW to see they were a bad idea.)

11:38 · 4/27/20 · Twitter Web App

|| View Tweet activity

ATTACHMENT 3

Mark Changizi @MarkChangizi · 5/24/20

The Lockdown religious cult.

- ~ Believed initially on faith (“common sense”)
- ~ Impervious to evidence they did nothing
- ~ Demand that all else must be sacrificed
- ~ Requires unrelenting devotion and asceticism
- ~ Promises forever life
- ~ Moral outrage for any who protest



59



655



1,546



ATTACHMENT 4

 **Mark Changizi** @MarkChangizi · 7/23/20

New study a TOTAL surprise to sufferers of The Illusion of Control 

“Rapid border closures, full lockdowns, & wide-spread testing were not associated with COVID-19 mortality per million people.”

Chaudhry et al (2020) EClinicalMedicine

[thelancet.com/journals/eclin...](https://www.thelancet.com/journals/eclin...)

ht @aginnt

 20  218  363 

ATTACHMENT 5

Mark Changizi @MarkChangizi · 9/9/20

Infection fatality rate for

- flu in the U.S. over last decade in range from 0.1% to 0.18%.

- COVID in range of 0.1% to 0.3%

[cdc.gov/flu/about/burd...](https://www.cdc.gov/flu/about/burd...)



9



44



99

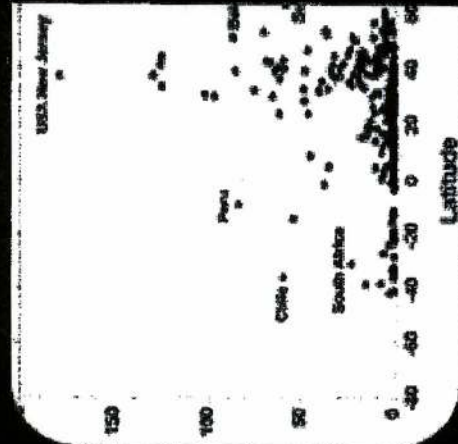


ATTACHMENT 6

Mark Changizi @MarkChangizi · 11/21/20

📌 BREAKING: Another study finds no benefits from lockdowns 📌

“Stringency of the measures settled to fight pandemic, including lockdown, did not appear to be linked with death rate.”



Covid-19 Mortality: A Matter of Vulnerability Among Nations F...
frontiersin.org

🗨️ 25 🔄 409 ❤️ 802 📌

ATTACHMENT 7

Thread

 Mark Changizi @MarkChangizi · 12/2/20



ASYMPTOMATIC TRANSMISSION RARE

Transmission rate increased with the severity of index cases, from

- 0.3% for asymptomatic
- 3.3% for mild
- 5.6% for moderate, and
- 6.2% for severe or critical cases.

PubMed.gov

Contact Settings and Risk for
Transmission in 3410 Close C...
pubmed.ncbi.nlm.nih.gov

ATTACHMENT 8

 Mark Changizi @MarkChangizi · 12/2/20

 Spread via smoke-like aerosols 

“Strong evidence from case and cluster reports indicates that respiratory transmission is dominant, with proximity and ventilation being key determinants of transmission risk.”

That’s why masks are useless.


Transmission of SARS-CoV-2: A
Review of Viral, Host, and Env...
acpjournals.org



ATTACHMENT 9



**Hi Mark Changizi,
Your account, @MarkChangizi has
been locked for violating
the Twitter Rules.**


Specifically for:

Violating the policy on spreading misleading and potentially harmful information related to COVID-19.

We understand that during times of crisis and instability, it is difficult to know what to do to keep yourself and your loved ones safe. Under this policy, we require the removal of content that may pose a risk to people's health, including content that goes directly against guidance from authoritative sources of global and local public health information.

For more information on COVID-19, as well as guidance from leading global health authorities, please refer to the following links:
Coronavirus disease (COVID-19) advice for the public from the WHO
FAQs about COVID-19 from the WHO

 **Mark Changizi**
avatar @MarkChangizi

 **New Review: Masks (ineffective, Harmful)** "The existing scientific evidences challenge the safety and efficacy of wearing facemask as preventive intervention for COVID-19." r Kb

Please note that repeated violations may lead to a permanent suspension of your account. Proceed to Twitter now to fix the issue with your account.

[Go to Twitter](#)

[Need some help?](#)

Twitter, Inc. 1355 Market Street, Suite 900 San Francisco, CA 94103

ATTACHMENT 10




Hello Mark Changizi,

Your account, MarkChangizi has been suspended for violating the Twitter Rules.


Specifically, for:

Violating our policy on spreading misleading and potentially harmful information related to COVID-19.

You may not use Twitter's services to share false or misleading information about COVID-19 which may lead to harm.

 **Mark Changizi**
avatar @MarkChangizi

@Chiding_wisely @kiwinizzel1 @stephen_PtC Covid is 10 to 20 times less danger than flu for kids. Get A. Grip. There is NO long term data for the shot. And even the short and medium term data for that age group are ambiguous at best. [https://\[...\]](#)

 **Mark Changizi**
avatar @MarkChangizi

@MisterGoold @antinormz ~ Asymptomatics rarely spread it ~ Vaccinations don't slow spread ~ Unvaxxed pose no threat to vaxxed ~ Risks are broadly flu-like (and safer than flu for <40) ~ Huge % of unvaxxed have superior natural immunity via recovery

Note that if you attempt to evade a permanent suspension by creating new accounts, we will suspend your new accounts. If you wish to appeal this suspension, please contact our support team.

ATTACHMENT 11

ove the responsiveness of your Mac.



Mark Changizi

80K Tweets

Following

Age-restricted adult content. This content might not be appropriate for everyone. To view this media, you'll need to add your birthdate to your profile. Twitter also uses your age to show more relevant content, including ads, as explained in our Privacy Policy. [Learn more](#)

Age-restricted adult content. This content might not be appropriate for everyone. To view this media, you'll need to add your birthdate to your profile. Twitter also uses your age to show more relevant content, including ads, as explained in our Privacy Policy. [Learn more](#)

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ATTACHMENT 12

4/ IT'S ACTUALLY GOVERNMENT CENSORSHIP

Much of the reason why big tech is engaging in censorship is pressure from government itself, and so the premiss at the start of this thread is false. They're not acting as a private company, but are a de facto arm of the state.

11:32 · 1/5/21 · Twitter Web App

|| View Tweet activity

64 Retweets 4 Quote Tweets 209 Likes

ATTACHMENT 13



Mark Changizi @MarkChangizi · 5/5/21

🔥 **FREE EXPRESSION ALERT** 🇺🇸

Amazing! She specifically threatens Big Tech here to censor or risk greater regulation.

“And he supports a robust anti-trust program,” she adds after saying that social media has a responsibility to stop amplifying counter-narrative expression.

PM. **The Post Millennial** 🔒 @TPo... · 5/5/21

Press Secretary Psaki calls big tech censorship a "health and safety" issue and calls on platforms to do more to censor Americans.



32

166

292



ATTACHMENT 14



Mark Cha... @MarkCha... · Sep 20, 2021

"You shouldn't be banned from one platform and not others for providing misinformation." -- Your federal government who is totally not directing Big Tech censorship and thereby violating the First Amendment.



The First @TheFirstonTV · Jul 16, 2021

Psaki says if you're banned on one social media platform you should be banned on every social media platform.



19

91

229

