

# EXHIBIT 3

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### Declaration of Dr. Andrew G. Huff, PhD, M.S.

I attest that the following is a true and accurate representation of facts and my experiences:

Name: Andrew G. Huff, PhD, M.S.

Personal History/Background/Qualifications:

- From 2002 to 2008 I served in the U.S. Army in both the Minnesota National Guard and on active duty in the US Army as an infantryman.
- I was ordered to serve on active duty to support and fight in the Global War on Terrorism as part Operation Enduring Freedom as an infantryman in Central America, and I volunteered to serve in combat in Operation Iraqi Freedom, where I received numerous medals, awards, and accolades at the low ranks of Private First Class and Specialist.
- While performing combat operations in Iraq, I continued my undergraduate studies while it was my turn to sleep and prepared and competed in Non-Commissioned Officer Review Boards, where I performed the best among the candidates in all aspects of the review except fitness. I was also nominated by my commanding officer to attend Officer Candidate School at the end of my tour in Iraq, based on my performance, leadership ability, and success at executing officer level tasks, which were assigned to me.
- After returning home from Iraq, I completed a heavily research and quantitatively focused bachelor's degree in Psychology at the University of Minnesota, which is one of the top psychological research institutions in the world. I worked directly with many of the world's leading experts in personality, vocational, career interests, clinical, and counseling psychology research, and completed independent quantitative psychological research which was submitted for peer review publication.
- Simultaneously, to earning my Bachelor's degree, I was a program assistant and contracts technical representative (COTR) for the United States Department of Veterans Affairs, where I relocated and opened several new outpatient mental healthcare offices for the agency and managed numerous contracts and relationships with healthcare providers. My supervisor became severely ill, and I independently and successfully managed the organization and contract facilities across the upper Midwest and staff in his absence at the age of 26, which resulted in a financial bonus paid by the government.



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- Next, I earned a master's degree in Security Technologies with a minor in Geographic Information Systems, finishing at the top of my class, from the College of Science and Engineering at the University of Minnesota. In the program, I learned to solve national security problems against different types of critical infrastructures using complex systems analysis, systems modeling, high performance computing, intelligence collection techniques and trade craft, international security, bioterrorism, behavioral threat analysis, cryptography, cyber security, vulnerability, and risk assessment among other things. Upon completion of my master's degree coursework and research thesis defense, in only fifteen months, my thesis committee strongly encouraged me to obtain a PhD and was informed that I should meet with one of my instructors which was a member of the faculty in the School of Public Health.
- After meeting with Dr. Jeff Bender from the School of Public Health and College of Veterinary Medicine at the University of Minnesota, I was offered full employment as a Research Fellow at a Department of Homeland Security Center of Excellence at the University of Minnesota, along with a full scholarship to obtain a Ph.D. related to the fields of bioterrorism, biowarfare, chemical warfare or terrorism, pandemics, and emerging infectious disease. This is the best possible offer a Ph.D. student can receive anywhere throughout academia and is rare.
- I earned a Ph.D. from the University of Minnesota's School of Public Health's Environmental Health Science program with a specialization in Emerging Infectious Diseases. My core focus of my education and research was pandemic preparedness response, bioterrorism, biowarfare, biosecurity, chemical attacks & exposures, and biosafety. I completed the program at a record pace (around 3 years) and all my novel research was published in peer reviewed and referred journals before I submitted my dissertation for review.
- While working as a Research Fellow at a Department of Homeland Security Center of Excellence, I frequently traveled to Washington, D.C. and around the country where I became an active member of US government committees and meetings related to pandemics, public health, and national security. I was introduced to many high-level managers within the US government working in these areas, and I frequently presented my research at US government meetings, to executives in the private sector at large multinational companies, and worked directly with industry and state governments to help improve their national security in areas where I have subject matter expertise.
- Upon completing my Ph.D., I was recruited by Sandia National Laboratories, where I served the U.S. Government as a Senior Member of the Technical Staff and held a Department of Energy 'Q' clearance (equivalent to the Department of Defense's Top-



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Secret designation). At Sandia, I analyzed complex national security problems in my areas of expertise, served as a subject matter expert in public health systems and food systems, and participated in a broad spectrum of projects related to pandemic preparedness, mitigation, and response. Wishing to leave the classified work environment, and due to a funding shortfall in my area of passion (preventing intentional contamination of the food supply), I decided to seek work elsewhere in the fall of 2014 and I applied to EcoHealth Alliance in September of 2014.

- Shortly after applying to a position at EcoHealth Alliance, I interviewed with Dr. Peter Daszak on the telephone and then traveled to EcoHealth Alliance's office in New York City for a comprehensive on-site interview. After completing the interview, I was offered and accepted a position as a Senior Scientist in charge of the Data and Technology team. Upon beginning work at EcoHealth Alliance, I was asked to perform a series of duties which would be considered normal in any kind of scientific or academic organization.

### Information Related to EcoHealth Alliance and the Development of SARS-COV2:

- In late 2014, I was asked to prepare a report for the Intelligence Advanced Research Projects Activity, Office of the Directorate of National Intelligence, (IARPA). I later learned upon promotion to Associate Vice President while attending weekly finance updates that EcoHealth Alliance did not receive any funding from this agency (IARPA), as far as I am aware. **Reference: IARPA Collaborator Report from Dr. Huff's documents retained from his employment at EcoHealth Alliance.**
- In late 2014, I was asked to review (provide edits, comments, and feedback) on a research proposal that was in preparation to be submitted to the National Institutes of Health's (NIH) National Institute for Allergens and Infectious Diseases (NIAID) to conduct Gain of Function research and development with numerous partners including the Wuhan Institute of Virology, which was supported by Dr. Ralph Baric at the University of North Carolina (UNC). **Reference: File name "CoV as submitted" titles "Understanding the Risk of Bat Coronavirus Emergence" Dr. Huff's documents retained from his employment at EcoHealth Alliance.**
  - I attest that I reviewed the proposal that was submitted to NIH which detailed the gain of function virology work that was being conducted to create the agent known as SARS-COV2, which causes the disease known as COVID-19.
  - I attest that the proposal clearly stated that the gain of function work on SARS-COV2 was already underway in China, prior to October 2014, at the Wuhan



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Institute of Virology (WIV), with the support of USAID in collaboration with EcoHealth Alliance and EcoHealth Alliance's partners and sponsors.

- I attest that I made Dr. Peter Daszak aware of the lack of a Biological Security Officer (BSO) and Institutional Biosafety Committee (IBC) at EcoHealth Alliance in reference to the Select Agent Form on in the "Understanding the risk of Bat Coronavirus Emergence" proposal in accordance NIH requirements.
- I witnessed firsthand presentations by Dr. Shi Zhengli (WIV) and Dr. Ralph Baric (UNC) at EcoHealth Alliance related to their Gain of Function work managed and supported by EcoHealth Alliance.
- I witnessed firsthand presentations by the executive team at EcoHealth Alliance related to the gain of function work conducted at EcoHealth Alliance.
- I attest that EcoHealth Alliance's developed SARS-COV2 and is responsible for the development of the agent SARS-COV2 during my employment at the organization.
- I attest that I informed the EcoHealth Alliance executive team that I believed there were biosafety and biosecurity risks in contract laboratories during an executive meeting. Specifically, I was concerned that EcoHealth Alliance did not have enough visibility or firsthand knowledge of what was happening at foreign laboratories contracted and managed by EcoHealth Alliance. During this meeting I discussed bio-risk management with the team due to these concerns. Dr. Daszak refused to mitigate the risks without any objection or discussion from the other executives. In my opinion, Daszak was dismissive of my concerns. He did not seem concerned about EcoHealth's lack of oversight which I felt was strange because it is typically the CEO's duty to protect the organization from organizational threats and risks. After raising my concern, I accepted Peter's position that our control measures were adequate. **Reference: See leaked cables that the US Consulate Cables to the State Department reported Laboratory Safety Concerns at the Wuhan Institute of Virology.**
- In this same short time-period, I was asked to review and contribute to an investment "pitch deck" (i.e., a PowerPoint presentation used in venture capital presentations) that was presented to an organization called In-Q-Tel. In the pitch dick, we proposed an extension of the USAID global disease surveillance work, SARS-COV2 gain of function and humanized mice research conducted by Drs. Baric and Zhengli, and my work from my department developing advanced biosurveillance technologies and platforms. This



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work was presented to In-Q-Tel (which can be verified by their own records). I do not know what the outcome of that meeting as it was not communicated to me by Dr. Daszak.

**Reference: File name Peter Daszak In-Q-Tel October 2015 from Dr. Huff's documents retained from his employment at EcoHealth Alliance and the In-Q-Tel Quarterly report.**

- On or around June 2015, I was promoted to Vice President. After being promoted to Vice President, I was exposed and participated in more aspects of the organization, as would be expected from an Executive Officer at any organization.
- I began attending weekly financial meetings where I learned that the organization was tight on cash, depended heavily on government contract salary overhead to remain solvent, and that the organization was not involved in traditional conservation work as classically defined. This was upsetting as this was one of the main reasons that I wanted to join the organization (being a conservationist and naturalist). **Reference: EcoHealth Alliance Marketing video from Dr. Huff's documents retained from his employment at EcoHealth Alliance.**
- I also observed that EcoHealth Alliance was engaged in irregular financial transactions regarding U.S. Government grants. Specifically, I believe there was timecard fraud and observed what I appear to be double dipping on contracts, between government organizations and private donors (e.g., Skoll Foundation, Google Foundation, Bill & Melinda Gates Foundation, & Wellcome Trust), or both. **Reference: Compare stated objectives, work locations, and data collection across a range of projects from Dr. Huff's documents retained from his employment at EcoHealth Alliance.**
- I later confronted Dr. Peter Daszak, Harvey Kasdan (CFO, deceased), Dr. Aleksei Chmura about the financial fraud when I was upset, arguing for pay raises in my department, company-wide salary increases, and for myself. Shortly thereafter (1-2 days), CFO Harvey Kasdan passed away from a heart attack. I am not insinuating foul play, but I believe the stress was too much for him in his physical condition. **Reference: Harvey Kasdan's Obituary.**
- I also observed, while attending board meetings and in communications directly with board members, that Dr. Peter Daszak had a pattern of over-simplifying and lying by omission to our stakeholders (including the board of directors). For example, while EcoHealth Alliance positioned itself as a conservation organization, no substantial conservation work, as traditionally defined, was occurring at the organization.



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- The USAID Predict program was a global hunt for viruses predicated upon the promise of predicting and preventing pandemics. I believe that the data limitations and methods for collecting and analyzing that data make this goal impossible to achieve. I further believe that this program is more strongly aligned with collecting the biological samples to conduct gain of function viral work, or intelligence collection, than prediction and prevention of pandemics.
- Gain of function research is a highly contentious topic in my scientific area of expertise. Those who are for it make the argument that if you can identify a high-risk pathogen, and then engineer the pathogen in the laboratory to increase its transmissibility, infectivity, pathogenicity, or virulence, then you can develop medical countermeasures to prevent the spread of disease, if an outbreak of a **naturally evolving** agent were to occur. I believe this logic to be inherently flawed because **it is naïve to think that humans can modify or engineer a naturally occurring pathogen that would evolve similar to the way infectious agents naturally evolve.** Typically, Gain of Function research (via selection of rare traits or genetic manipulation or engineering of the agent) undergoes **thousands of years of unnatural evolution (decided by humans not by nature) in a laboratory in a matter of days weeks or months.** This is akin to predicting the future, with the likelihood of success decreasing in every timestep.
- After being promoted to Vice President, I commented on several concerns I had related to protecting the organization including biosafety, biosecurity, enterprise security, and risk management. None of the other executives voiced any opposition to Gain of Function research being conducted at EcoHealth Alliance, and Dr. Daszak was heavily supportive of the work. Drs. Johnathan Epstein and Kevin Olival were supportive of the work and were key contributors to the gain of function work in the SARS-COV2 proposal funded by USAID and NIH, and executed by EcoHealth Alliance, the WIV, and UNC. My opposition to Gain of Functions research stemmed from my Ph.D. studies taught by my Committee Chair, Dr. Michael T. Osterholm, who was also President Joe Biden's COVID advisor.
- In November 2015, a scientifically peer reviewed, and referenced article was published by collaborators from the Wuhan Institute of Virology, the University of North Carolina Chapel Hill (UNC), the Food and Drug Administration, Harvard Medical School, and the Bellinzona Institute of Microbiology. The peer reviewed article was titled "A SARS-like Cluster of Circulating Bat Coronaviruses Shows Potential for Human Emergence" in the journal *Nature Medicine*. The authors initially omitted the funding source from the USAID - EPT - PREDICT program, which I was a co-investigator and country coordinator while employed by EcoHealth Alliance. The USAID - EPT - PREDICT funding cited in the article was used to develop a relationship between Drs. Ralph Baric



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(UNC) and Zhengli-Li Shi of the Wuhan Institute of Virology at EcoHealth Alliance, which was orchestrated by Dr. Peter Daszak. Additionally, the USAID- EPT - PREDICT funding used in this peer reviewed paper was used to collect biological samples from bats globally. Then, the collaborators analyzed the collected samples to extract SARS like-corona viruses, and select or engineer genetic features within the viruses, collected with USAID - EPT - PREDICT funding, to create hybrid chimeric viruses. Chimeric viruses are defined as combining the genetic material from two or more distinct viruses. **The process of developing SARS-COV2 was also described in detail in the proposal submitted to, and ultimately funded by, the National Institutes of Health (HHS NIH), The National Institute of Allergy and Infectious Diseases (NIAID), by EcoHealth Alliance with the WIV and UNC listed as collaborators.** It is my attestation, that the creation of these SARS-like chimeric viruses described in this article include SARS-COV2. Lastly, the engineered SARS-COV2 was then used to test SARS vaccines and monoclonal antibody therapeutics against the disease in mice. **Reference: Menachery, V. D., Yount, B. L., Debbink, K., Agnihothram, S., Gralinski, L. E., Plante, J. A., ... & Baric, R. S. (2015). A SARS-like cluster of circulating bat coronaviruses shows potential for human emergence. *Nature medicine*, 21(12), 1508-1513.**

- Dr. Peter Daszak approached me in late 2015 and stated that somebody from the Central Intelligence Agency (CIA) approached him and stated that they were interested in the places we were working, the people we were working with, and the data we were collecting. Peter then proceeded to ask me for my advice, and specifically asked whether we should work with them. I was shocked that Peter asked me this and was excited for the opportunity. I stated to Peter that “It never hurts to talk to them. There could be money in it.” Peter then later confirmed over the next 2 months, between our weekly meetings that the relationship with them was proceeding.
- In March 2016, a paper was published by Dr. Ralph Baric, an EcoHealth Alliance gain of function collaborator working at UNC, in PNAS titled “SARS-like WIV1-CoV Poised for Human Emergence.” In the article, the authors of the paper describe in detail how they used, designed, and constructed full-length and chimeric viruses to determine if they would replicate in human airway cultures. This specific paper is relevant because it compares and documents the effectiveness of different variations of coronavirus spike proteins at infecting human cells specifically by binding to ACE2 receptor, which was a critical and necessary step to design and engineer the SARS-COV2 virus. While employed at EcoHealth Alliance, I met both Dr. Shi Zhengli and Dr. Ralph Baric, where they presented their work on the design and engineering of SARS-CoV2 (coronavirus



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gain of function research), and the use of highly specialized humanized mice models, which were necessary to successfully build SARS-COV2. These facts are supported by numerous recorded presentations by Dr. Peter Daszak and Dr. Ralph Baric from 2015-2019. Some of which, I personally attended while employed at EcoHealth Alliance. Additionally, the specific gain of function work described in this paper was presented by Dr. Peter Daszak to In-Q-Tel, a DoD and CIA venture capital firm. In the slides presented to In-Q-Tel, which I personally helped create at EcoHealth, describe the use of USAID – EPT – PREDICT funding to collect coronavirus samples from bats globally, where they are then analyzed to identify their most dangerous features to humans, and recombined to make new coronaviruses like SARS-COV2. Then, these viruses are tested on humanized mice to validate lethality and transmissibility. EcoHealth Alliance then used Dr. Baric’s work for testing experimental vaccines, treatments, and therapeutics against the newly engineered SARS-COV2 strain to determine which countermeasures would be the most effective at mitigating the disease in humanized mice. **Reference: Menachery, V. D., Yount Jr, B. L., Sims, A. C., Debbink, K., Agnihothram, S. S., Gralinski, L. E., ... & Baric, R. S. (2016). SARS-like WIV1-CoV poised for human emergence. *Proceedings of the National Academy of Sciences*, 113(11), 3048-3053.**

- In late September or early October of 2019, I was contacted by Dr. Amy Jenkins and she was attempting to recruit me to be a Program Manager for emerging infectious disease work at the Defense Advanced Research Projects Agency (DARPA). I first met Dr. Amy Jenkins as a Ph.D. student and paid Research Fellow at a Department of Homeland Security Center of Excellence at the University of Minnesota in 2014. The position at DARPA was presented to me as if it was mine if I wanted it and I was told that it would need Top Secret Security clearance with a polygraph. I felt that the recruitment effort was quite strange as I had not worked full-time and directly in the national security space since 2014 at Sandia National Laboratories and I had no clue how Dr. Jenkins obtained my new personal cell phone number. Coincidentally, this is when epidemiological evidence indicates that the first cases of COVID-19 likely emerged. The two events may not be related; however, it is my belief that people working within the US government potentially identified me as a risk to knowing firsthand that the SARS-COV2 disease emergence event was a consequence of the US government’s sponsorship of the genetic engineering of SARS-COV2 domestically and abroad. If I would have accepted the position, then I suspect that DARPA would have disclosed restricted information to me which would have consequently prevented me from discussing any of this information publicly, like I have been and am doing now. The recruitment effort itself was highly suspect as it seemed as if DARPA was completely circumventing the US government recruitment process for one of the most prestigious scientific positions in the world.



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- I attest that I analyzed the funding of Dr. Kristian Andersen of the Scripps Research Institute from data obtained from NIH funding databases. Dr. Andersen's funding dramatically increased after changing his position on the characterization of the agent as being manmade, to naturally emerging, after a series of discussions with Dr. Anthony Fauci.

Total Funding Awarded Per Month Before Fauci Teleconference	Total Funding Awarded Per Month After Fauci Teleconference
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\$393,079.65

\$800,139.15

Total Funding Awarded Per Calendar Year Before Fauci Teleconference	Total Funding Awarded Per Calendar Year After Fauci Teleconference
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\$ 1,042,628.25

\$2,284,161.08

Total Continuing Funding Before Fauci Teleconference	Total Continuing Funding After Fauci Teleconference
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\$7,141,011.83

\$23,724,681.83

**Total Continuing Funding INCREASE After Fauci Teleconference**

**\$16,583,670.00**

- Lastly, at no point in time has any restricted information, including classified information, been shared with me related to the domestic or foreign engineering of the biological agent SARS-COV2, the subsequent release of SARS-COV2, the attempted cover-up of by officials working for the United States government. I have never leaked any legally obtained classified information or violated the rules and laws related to my past security clearances. The information that I have shared from my time at EcoHealth Alliance is not restricted by any non-disclosure agreement, nor is it US government protected or restricted information, as EcoHealth Alliance is supposedly a non-profit



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corporation conducting scientific research to protect human and animal health. All the documents that I have shared were created by myself or other personnel by EcoHealth Alliance and were not subject to derivative classification by the US government, which is standard practice in academic institutions. My findings, opinions, and analysis were informed by my highly specialized education in the field of emerging infectious diseases from one of the top 5 graduate programs in the world, by my experience working in the field, and by analysis of publicly available open source and open access information. Simply, I know how and where to find accurate and relevant information related to pandemics, emerging diseases, biowarfare, and bioterrorism quickly and know how to properly frame this information from my knowledge of how the government works in the context of relevant policy frameworks.

- In context, this series of events when they took place, did not seem of any consequence nor did I ever think or believe that I would be in this terrible position. I have been severely harassed by what appears to be state-sponsored actors based on the level of sophistication, persistence, and duration, of the harassment and crimes committed against me. I understand that these facts are difficult for our country. I have viewed this as a non-partisan issue since coming forward as a Whistleblower, as my only goal is to prevent another manmade pandemic from occurring. COVID-19, the disease caused by SARS COV2, in my professional opinion, is the result of Gain of Function research that was mismanaged by EcoHealth Alliance and its contractors.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed On (Date): 13 September 2022

Signature:   
Andrew G. Huff, Ph.D., M.S.