

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ACADEMY OF PEDIATRICS, *et
al.*,

Plaintiffs,

vs.

ROBERT F. KENNEDY, JR., in his official capacity as Secretary of the Department of Health and Human Services, *et al.*,

Defendants.

Case No. 1:25-cv-11916 (BEM)

DECLARATION OF DIANA ZUCKERMAN, Ph.D.

I, Diana Zuckerman, Ph.D., declare pursuant to 28 U.S.C. § 1746 that the following is true and correct and within my personal knowledge.

1. I am over the age of 18 years old. All of the facts set forth in this declaration are based on my personal knowledge.
2. I received my doctorate in psychology from The Ohio State University and completed post-doctoral training in epidemiology and public health at Yale Medical School.
3. After working in academia, I worked as a staff member in Congress, at the U.S. Department of Health and Human Services, and in the White House.
4. I held leadership positions in several nonprofit organizations after my government service.
5. In March 1999, I founded the National Center for Health Research (NCHR), where I currently am President.

6. On June 12, 2025, I was contacted by email by Elizabeth Brehm. The email stated:

On Thu, Jun 12, 2025 at 5:44 PM Elizabeth Brehm <[REDACTED]> wrote:

Hi Diane,

Pleasure to meet you. I received your email address from [Redacted Name]. I wanted to see if you had a few minutes to chat about ACIP today/this evening. If so, can you please share the best number to reach you at?

Thanks,

Elizabeth

Elizabeth A. Brehm, Esq.
Siri | Glimstad

[745 Fifth Avenue](#)
[Suite 500](#)

[New York, NY 10151](#)
Direct: 929-220-2758

Main: 888-747-4529
Fax: 646-417-5967
[www.sirillp.com](#)

7. I responded to Ms. Brehm's email a few minutes later as follows:

From: Diana Zuckerman <[REDACTED]>
Date: Thu, Jun 12, 2025 at 5:51 PM
Subject: Re: ACIP
To: Elizabeth Brehm <[REDACTED]>

Hi Elizabeth,

I am free after 7:30 Eastern. Does that work for you? [REDACTED]

Diana Zuckerman, Ph.D.
President
National Center for Health Research
[1001 Connecticut Ave, NW, Ste. 1100](#)
[Washington, DC 20036](#)
[www.center4research.org](#)
[www.stopcancerfund.org](#)

8. On the evening of June 12, 2025, sometime after 8:00 p.m., I spoke with Ms. Brehm by telephone. She identified herself as an attorney at Siri & Glimstad and stated that she was assisting Mr. Siri in identifying potential candidates for the ACIP. At that time, the name Aaron Siri was not familiar to me. I started the interview by providing information about my concerns about the research used to approve the Covid vaccines, but she changed the subject because she instead wanted my views on “the vaccine schedule” for children. When I asked her what she meant by the vaccine schedule, she was somewhat vague but mentioned the large number of vaccines that children have to get. I responded that I know some parents are unhappy that young children are given many vaccines at once, but that there is flexibility in the timing of when children get vaccines and that one reason pediatricians generally prefer to give children multiple vaccines at the same doctor’s visit is concern that the parent will not bring the child back in a timely manner for the other vaccines. She did not seem interested in the timing issue, and asked me if I thought parents should have more say in which vaccines their children receive. I said parents do have a say and that parents could make choices based on religious or medical reasons. I don’t recall if she used the word “mandate,” but she conveyed that parents did not have the choices that they should have.

9. Then she asked me if I thought that the decision regarding childhood vaccines should be a decision made only between the parents and the doctor. I responded that there is a need for evidence-based guidelines because some doctors are more knowledgeable about vaccines than others, and some parents are more knowledgeable than others. I pointed out that doctors can be unduly influenced by information from pharmaceutical companies or from social media or other biased sources and that’s why parents and physicians benefit from unbiased sources of information. She then said she wanted to be clear and she directly asked if I “would be comfortable

saying" that I believe that the decision regarding childhood vaccines should be a decision only made between the parents and the doctor. I said I wouldn't. It was clear to me that was not the answer she was looking for because she ended the interview very quickly after that.

10. I asked her if she wanted my c.v. or bio and she said yes, I should send the bio that night since they wanted to make the decision about additional ACIP members very soon, but I had the impression she was just trying to end the interview politely. I sent her my bio that night by email, and she replied to my email as follows:

From: **Elizabeth Brehm** <[REDACTED]>
Date: Thu, Jun 12, 2025 at 9:32 PM
Subject: RE: ACIP
To: Diana Zuckerman <[REDACTED]>

Received – thank you so much for taking the time to talk to me and to put this together and send tonight. Appreciate it. Will review.

11. After June 12, 2025, I did not hear anything from her, her law firm, or anyone else about joining the ACIP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Diana Zuckerman, Ph.D.

Diana Zuckerman, Ph.D.

Executed on February 12, 2026