

From: James E. Enstrom <jenstrom@ucla.edu>
Date: Tue, Jan 4, 2022 at 10:00 AM
Subject: Scientific Misconduct by HTHCSPH Professor Francesca Dominici
To: John Quackenbush <johnq@hsph.harvard.edu>
Cc: Clifford S. Duke <cduke@nas.edu>

January 4, 2022

John Quackenbush, PhD
Professor and Chair, Department of Biostatistics
Harvard TH Chan School of Public Health (HTHCSPH)
johnq@hsph.harvard.edu

Re: Scientific Misconduct by HTHCSPH Professor Francesca Dominici

Dear Dr. Quackenbush,

I am herewith submitting to you a formal complaint of scientific misconduct against Francesca Dominici, PhD, Clarence James Gamble Professor of Biostatistics, Population and Data Science at the HTHCSPH (<https://www.hsph.harvard.edu/francesca-dominici/>). My complaint consists of the following nine points that challenge the scientific validity of her EPA-funded claims that inhaling about 100 µg of fine particulate matter (PM2.5) per day **causes** premature deaths without any proven **causal** mechanism:

1. Her deliberate falsification of the research record on PM2.5 deaths obscures the many NULL findings
2. Her opposition to transparency in EPA research hinders reproducibility of all PM2.5 death findings
3. Enstrom 2017 challenges the validity of PM2.5 NAAQS and her findings of Medicare PM2.5 deaths
4. Smith 2021 reanalysis of Di JAMA 2017 challenges her findings of PM2.5 deaths below 12 µg/m³
5. Her service on the EPA-funded NASEM NAAQS Committee violates NASEM conflict of interest policy
6. Her advocacy for tightening the PM2.5 NAAQS is erroneous given the existing low US PM2.5 levels
7. She misuses Medicare records for weak ecological epidemiology and unjustified **causal** conclusions
8. Her access to confidential Medicare records is without the informed consent of 69 million Americans
9. Her 30+ Chinese co-authors are a concern for HIPAA violation of Medicare records confidentiality

I have very strong evidence to support all nine of the above points, such as, my 36-page December 10, 2021 Comments to EPA CASAC (<http://scientificintegrityinstitute.org/PMPanel121021.pdf>) and my September 15, 2021 request to remove Dr. Dominici from the NASEM NAAQS Committee (<http://scientificintegrityinstitute.org/NASEMDominici091521.pdf>). I can submit additional evidence once you agree to examine my complaint.

I commend you for expressing strong support for transparent and reproducible scientific research by co-authoring the October 14, 2020 *Nature* commentary “Transparency and reproducibility in artificial intelligence” (doi: [10.1038/s41586-020-2766-y](https://doi.org/10.1038/s41586-020-2766-y)). Transparency and reproducibility are urgently needed in PM2.5 epidemiology.

Time is of the essence regarding my complaint because the EPA CASAC and its PM Panel are now preparing to formally recommend tightening the PM2.5 NAAQS and the NASEM NAAQS Committee is preparing (via secret meetings) a report on **causality** that is highly relevant to the PM2.5 NAAQS. Also, my complaint is relevant to the Federal lawsuit challenging the composition and legality of the current EPA CASAC (<https://junkscience.com/2021/12/wall-street-journal-editorializes-on-young-v-epa/>).

The scientific misconduct of Dr. Dominici is one example of “The Ideological Corruption of Science: in American laboratories and universities, the spirit of Trofim Lysenko has suddenly been woke.” This corruption is described by renowned theoretical physicist Lawrence Krauss in his July 13, 2020 Wall Street Journal Op-Ed (<https://www.wsj.com/articles/the-ideological-corruption-of-science-11594572501>). Dr. Krauss has appropriately noted that “Whenever science has been corrupted by falling prey to ideology, scientific progress suffers. This was the case in Nazi Germany, the Soviet Union . . .”

Thank you very much for your consideration of my complaint.

Sincerely yours,

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cc: NASEM BEST Director Clifford S. Duke, PhD