

# EXHIBIT 16

**Declaration of Joshua Hoppe, U.S. Marine Corps**

I, Captain Joshua Hoppe, do hereby declare as follows:

1. I am over the age of 18 years, have personal knowledge of the matters set forth in this Declaration, and if called upon to testify to them, I would and could do so competently.

2. I am currently domiciled in Pensacola, Escambia County, Florida.

3. I am a 7532/MV-22B Naval Aviator and Aviation Safety Officer in the United States Marine Corps currently serving at Marine Operational Test and Evaluation Squadron One (VMX-1) at Marine Corps Air Station (MCAS) Yuma, AZ.

4. On October 19, 20, and 21, 2022 I made inquiries as to what COVID shots were available at the Marine Corps Air Station (MCAS) Yuma Medical Treatment Facility (MTF). I specifically asked the Yuma MTF Staff if there were any Pfizer, Comirnaty, Spikevax, or Bivalent Boosters currently in stock at the MTF. I was informed that there were no Pfizer, Comirnaty, or Spikevax shots for Covid at the clinic and the only Bivalent Boosters were the Emergency Use Authorized (EUA) Moderna Bivalent Boosters as seen in the attached photos.

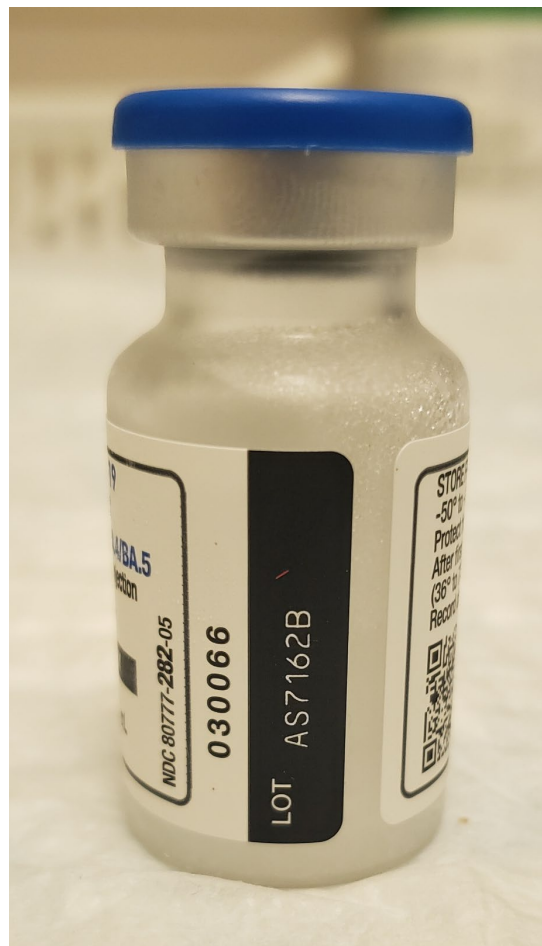
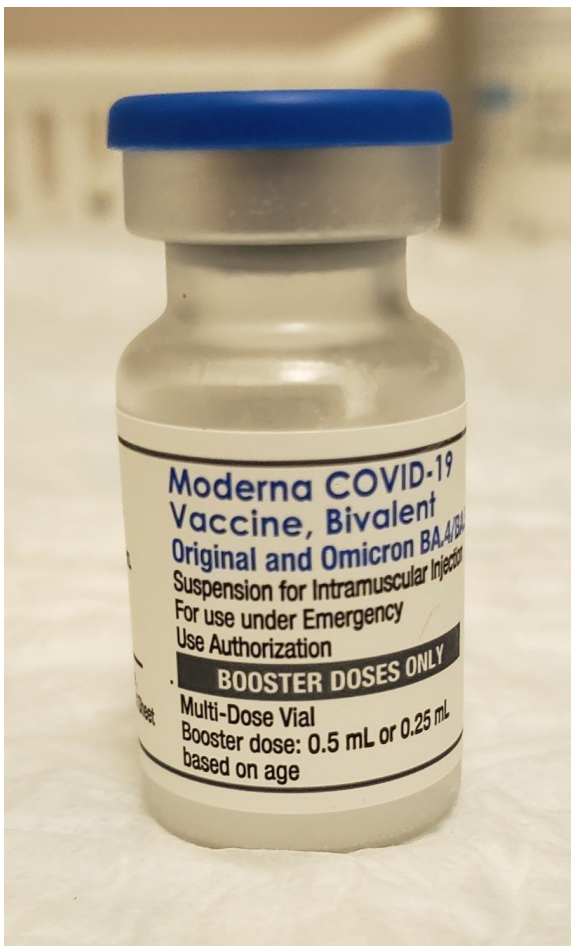
5. I am aware of Col Tonya Rans October 18, 2022 declaration in Coker v. Austin, ECF 124-1 and Exhibit A with the spread sheet from DHA Medical Logistics also certified October 18, 2022 that claimed Yuma had a total of 48 doses of “Pfizer Grey Cap Comirnaty” FW1333. I had also known that the FW1330 vials that were in stock at Yuma MTF in June 2022 had an updated expiration date updated to “26 Aug 2022” marked on the vials due to the fridge temperature. With knowledge of this and to ensure there was no mistake, I asked the Yuma clinic staff to double-check the fridge for any Pfizer, Comirnaty, Spikevax, and specifically FW1333 Comirnaty vials. I was informed that none of these were currently in stock at the Yuma MTF.

I declare under penalty of perjury, under the laws of the United States, that the foregoing statements are true and correct to the best of my knowledge.

Executed this October 22, 2022.

*/s/ Joshua Hoppe*  
Joshua Hoppe, Capt USMC

### COVID Boosters in Stock at MCAS Yuma MTF on October 20, 2022



### Comirnaty-Labeled Shots in Stock at MCAS Yuma MTF on June 30, 2022

