

# FARMER\_COMBINED\_01

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**Farmer, Donna 09-26-2018**  
**Farmer, Donna 01-24-2019**

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[REDACTED]

**Total Time 00:05:00**



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8:21 - 8:24	<b>Farmer, Donna 09-26-2018 (00:00:06)</b>	FARMER_COMBINED_01.1
	8:21 Q. Good morning.	
	8:22 A. Good morning.	
	8:23 Q. My name is Brent Wisner and I am an	
	8:24 attorney who represents the plaintiff in this lawsuit.	
9:5 - 9:12	<b>Farmer, Donna 09-26-2018 (00:00:13)</b>	FARMER_COMBINED_01.2
	9:5 Q. And I understand that you are currently	
	9:6 employed with a company called Bayer. Is that right?	
	9:7 A. I'm currently employed with Bayer, yes.	
	9:8 Q. Prior to that you were employed by	
	9:9 Monsanto Company; correct?	
	9:10 A. Correct.	
	9:11 Q. How long were you employed with Monsanto?	
	9:12 A. 27 years.	
18:3 - 18:8	<b>Farmer, Donna 09-26-2018 (00:00:16)</b>	FARMER_COMBINED_01.3
	18:3 Doctor, you are a spokesperson for	
	18:4 Monsanto; correct?	
	18:5 A. Well, my primary role at Monsanto is as a	
	18:6 toxicologist and because I have an extensive background	
	18:7 on the database and safety of glyphosate, I have been	
	18:8 asked at times to be a spokesperson.	
56:17 - 57:4	<b>Farmer, Donna 09-26-2018 (00:00:19)</b>	FARMER_COMBINED_01.4
	56:17 Q. And I've been calling you Dr. Farmer this	
	56:18 whole time but I just want to clarify you're actually	
	56:19 not a medical doctor; correct?	
	56:20 A. I am not an M.D.	
	56:21 Q. You don't treat patients; right?	
	56:22 A. No, I do not.	
	56:23 Q. You have a doctor in -- is it regulatory	
	56:24 toxicology; is that right?	
	57:1 A. No.	
	57:2 Q. Oh, I'm sorry.	
	57:3 A. I had a PhD in philosophy, and it's	
	57:4 anatomy and cell biology.	
278:20 - 279:9	<b>Farmer, Donna 09-26-2018 (00:00:38)</b>	FARMER_COMBINED_01.5
	278:20 isn't it true that before you got the	
	278:21 results of the Agricultural Health Study, you were	
	278:22 actually very concerned about the study and its	
	278:23 reliability?	
	278:24 A. I remember talking about what the	

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	279:1 Agricultural Health Study was, and anytime a study is 279:2 done, you're always curious of what the results are 279:3 going to be until you see the results. 279:4 Q. And before you got the results, before 279:5 they supported your company's position, you were 279:6 actually telling people that it kind of looks like junk 279:7 science, didn't you? 279:8 A. I don't remember saying that. 279:9 Q. All right. Handing you Exhibit 36.	
279:11 - 279:14	<b>Farmer, Donna 09-26-2018 (00:00:15)</b>	FARMER_COMBINED_01.6
	279:11 Q. All right, Doctor, I've handed you an 279:12 e-mail -- MONGLY00877463. Do you see that there's an 279:13 e-mail from you dated May 31st, 1999? 279:14 A. Yes.	EXHIBIT 454.1.1
280:6 - 280:9	<b>Farmer, Donna 09-26-2018 (00:00:04)</b>	FARMER_COMBINED_01.7
	280:6 Q. so these are 280:7 e-mails that were sent in the course of Monsanto's 280:8 work; correct? 280:9 A. Yes.	
287:24 - 288:17	<b>Farmer, Donna 09-26-2018 (00:00:42)</b>	FARMER_COMBINED_01.8
	287:24 Q. All right. A couple paragraphs down, you 288:1 tell your colleague, many groups have been highly 288:2 critical of the study as being a flawed study. In 288:3 fact, some have gone so far as to call it junk science. 288:4 See that? 288:5 A. That's what other groups were saying, and 288:6 I wanted to give John Thompson different perspectives 288:7 on what was being said about it out there. 288:8 Q. You wrote that sentence; right? 288:9 A. But it said many groups have been highly 288:10 critical. In fact, some have gone so far -- many 288:11 groups have gone so far as to say -- they call it junk 288:12 science. I'm just reporting what had been out there. 288:13 Q. Who are those groups? 288:14 A. Given this many years ago, I can't 288:15 remember. 288:16 Q. You can't tell me which groups were 288:17 calling the AHS junk science back in 1999?	EXHIBIT 454.1.2
288:20 - 288:20	<b>Farmer, Donna 09-26-2018 (00:00:01)</b>	FARMER_COMBINED_01.9
	288:20 A. I don't remember.	

288:21 - 289:18

**Farmer, Donna 09-26-2018 (00:01:04)**

FARMER\_COMBINED\_01.10

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288:21 Q. (By Mr. Wisner) It is small in scope and  
288:22 the retrospective questionnaire on pesticide usage and  
288:23 self-reported diagnosis also from the questionnaire is  
288:24 thought to be unreliable, but the bottom line is scary.  
289:1 There will be associations identified between  
289:2 glyphosate use and some health effects just because of  
289:3 the way the study is designed. Do you see that,  
289:4 Doctor?

289:5 A. I see that written there, yes.

289:6 Q. The use of retrospective questionnaire for  
289:7 pesticide usage you believed in 1999 was unreliable?

289:8 A. That's what I wrote there, but I'm sure  
289:9 that that -- given that I was talking about many groups  
289:10 and this is in epidemiology, I probably learned that  
289:11 from one of my epidemiology colleagues.

289:12 Q. Do you still think it's unreliable?

289:13 A. Again, I'm not involved in this anymore  
289:14 and their study's been out there. I think there's been  
289:15 a -- from my understanding they've done a really good  
289:16 job of changing some of the things they've done, their  
289:17 exposure algorithms, so -- I've heard some things that  
289:18 they have definitely improved the study over time.

290:16 - 290:18

**Farmer, Donna 09-26-2018 (00:00:11)**

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290:16 Q. Now, Doctor, one of the differences  
290:17 between when you wrote this in 1999 and today is that  
290:18 today you know the results of the AHS; right?

290:21 - 291:8

**Farmer, Donna 09-26-2018 (00:00:32)**

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290:21 A. Yeah, again, this was back in 1999. The  
290:22 study's been ongoing all that time since then and their  
290:23 reports stand for themselves.

290:24 Q. (By Mr. Wisner) So that's a yes? A

291:1 difference between when you wrote these words in 1999  
291:2 and today is that today you actually know the results  
291:3 of the AHS and back in 1999 you didn't?

291:4 A. We did not know at that time, but again,  
291:5 you have to take into consideration that when you have  
291:6 a lot of endpoints that you're going to be looking at  
291:7 in any study, you might have some -- by chance some  
291:8 associations.

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550:17 - 550:21

**Farmer, Donna 01-24-2019 (00:00:02)**

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550:17 The witness, DONNA FARMER, PhD, first having  
550:18 been duly sworn, testified as follows:

550:19 QUESTIONS BY MR. HALL:

550:20 Q. Good morning, Dr. Farmer.

550:21 A. Good morning.

551:11 - 552:2

**Farmer, Donna 01-24-2019 (00:00:30)**

FARMER\_COMBINED\_01\_14

551:11 Q. Tell us a little bit about your education  
551:12 after high school, please.

551:13 A. As I said, I was in raised in Denver, so I  
551:14 went to University of Colorado in Boulder. I have a  
551:15 bachelor of arts in biology, and then I went on to  
551:16 graduate school.

551:17 Q. What graduate school did you go to?

551:18 A. I went to the University of Cincinnati  
551:19 College of Medicine.

551:20 Q. Did you get a degree there?

551:21 A. Yes, I did.

551:22 Q. What degree did you get?

551:23 A. I have a PhD in anatomy and cell biology.

551:24 Q. In your PhD coursework, did you study  
552:1 toxicology?

552:2 A. Yes, I did.

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Total Time = 00:05:00

Documents Shown  
EXHIBIT 454