

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JAMES RODDEN, *et. al.*,
Plaintiffs,

v.

ANTHONY FAUCI, *et. al.*,
Defendants,

Civil Action No. :

DECLARATION OF EDWARD SURGEON

1. I am Edward Surgeon, a resident of Georgia and, of legal age and I make this declaration on personal knowledge.

2. I am a civilian employee of The U.S. Department of Agriculture and work as a District Veterinary Medical Specialist. I have been working for the Federal Government for 25 years.

3. I am long term Covid-19 antibody positive (blood tested), and I was confirmed positive of infection and symptomatic on August 3, 2021, via PCR testing.

4. I have taken antibody tests and been confirmed as having natural immunity.

5. My employer, The U.S. Department of Agriculture, has stated pursuant to Presidential Executive Order and follow-on rules to require me to be vaccinated.

6. It is my belief based on evidence that I am neither in danger nor am I a danger to others.

7. I wish to make my own medical choices and am fearful of a government employer declaring this attack on my bodily integrity with no reasonable cause.

8. The pressure put on me to conform— with threatened termination by November 22, 2021, if not earlier is enormous-and should I conform, it would prevent an adjudication of my constitutional and statutory rights to informed consent and bodily integrity.

9. Putting aside the uselessness of a vaccine to someone with natural immunity and the safety of the various emergency use vaccines long term, a common side effect of the vaccines is a sore arm and mild fatigue.

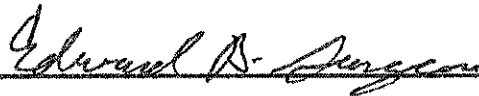
10. I do not believe my employer can, nor do I want, it to be able to force me to accept the equivalent of a punch in the arm whenever it likes on pain of termination for no known improvement of the safety of others.

11. Taking the vaccine, which for me is a medically useless act, would irreparably harm me in my person and in my control over my life and body.

12. Even should I prevail in some separate forum after threatened termination the time out of the labor force, effect on my psyche and well-being would never be recovered.

I declare under penalty of perjury the foregoing is true and correct.

Date: 11/03/2021

A handwritten signature in cursive script that reads "Edward B. Surgeon". The signature is written in black ink and is positioned above a solid horizontal line.

Edward Surgeon