

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

Andrew U. D. Straw and)
A.S., et. al.,)
 Plaintiffs.) 1-11 MDL 2218-TWT (N.D. Ga.)
v.) Hon. Thomas W. Thrash, Jr.
United States of America,) Judge Presiding
 Defendant.)

VERIFIED DECLARATION

I, plaintiff and attorney Andrew U. D. Straw, on behalf of myself and my daughter, Ava Straw, and the Estate of Sandra Kay Isaacs Straw Stevens, and James A. Stevens, make the following declaration to the Court:

1. The EPA has updated its website regarding Camp LeJeune poisoning, and I wish to provide this new information as necessary facts for the Court to consider.
2. Exhibit 1, page 1, notes that Camp LeJeune is an active Navy base.
3. The EPA states that, “site contamination **does not currently threaten people** living and working **near** the site.” Interestingly, it does not mention people living and working ON the site.
4. Exhibit 2 is the Superfund Site Profile with Site Information.

5. This webpage notes that the base includes “residential land uses.”
6. I have highlighted important statements on this Exhibit 2. I highlighted them to show that some of the most massive amounts of cleanup happened in the past 10 years, with people still living on the base and working there.
7. There is cleanup activity happening even in 2016 and there are plans to continue cleanup on the base in the years to come.
8. A shocking revelation of removal of 48,000 pounds of VOCs in 2003 and 2004 (Exhibit 2, p. 2) from Camp LeJeune makes the notion that living on this base was safe nonsensical.
9. Further, the EPA contradicted its own statement about safety of the base in Exhibit 2, where it said: “The [2015] review found that cleanup actions *will* protect people and the environment over the long-term *once complete*.”
10. This is a far cry from the statement in Exhibit 1 that everything is safe for humans now.
11. I hope this Court will look carefully at these two documents and understand that human beings are still living on this base

with massive amounts of contamination present and the EPA can't even decide if it is safe for humans to live there or not!

12. These EPA documents are admissions.

13. The Court must consider this base to be a toxic waste dump current remediation still underway, from one end of the base to the other, North, South, East, and West.

14. The children on this base rely on this Court to protect them.

15. If people are being exposed to toxins and flippantly told first that they ARE safe, and then that in the FUTURE it will be safe, this government has dirty hands.

16. No person with a complaint here should be denied based on any statute of limitations or repose when the government keeps on hurting people and lying.

17. There are children on this base today.

18. The very front page of Camp LeJeune website notes that children as of November 2016 are being vaccinated at these schools:

Johnson Primary School – Nov. 18

Heroes Elementary School – Nov. 21

LeJeune High School – Nov. 22

www.lejeune.marines.mil (Exhibit 3)

19. It is ironic that there is such concern about illness when these children are living, breathing, walking around on an active Superfund site with who knows how many millions of pounds of contaminated material still present. The EPA does even know the full extent of the poisons.

20. The Marine Corps is also burning leaves and trees across the base in 2016. Trees absorb these poisons from the soil and the water. And the Marine Corps are burning the trees, brush, and leaves, thereby putting whatever was in the trees from the soil right back into the air for children and their parents to breathe.

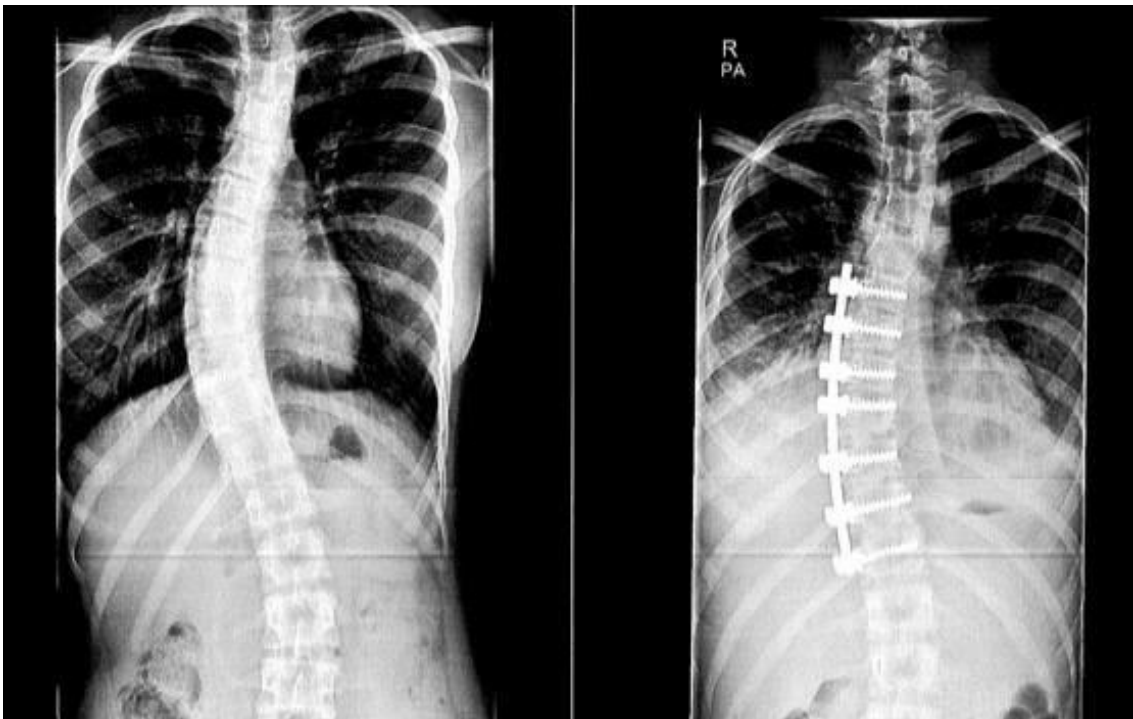
<http://www.lejeune.marines.mil/Prescribed-Burn-Notice/>

(Exhibit 4)

21. When I made the motion to evacuate this base, that was a real and present danger I was hoping the Court would address right now, not six months or a year later. This burn across the base has happened while this Court had my motion in hand.

22. I ask again for the base to be closed and for justice to be done for the people poisoned by a negligent government that has violated our constitutional right not to be poisoned by the federal government under the Fifth and Ninth Amendments. They violated that right from 1953 to 2016 and the government is going to keep on poisoning people until this Court forces it to stop.

23. I don't want any more children to have a spine like this, my daughter Ava's spine:



24. Please do not let them do this to anyone else.

25. Thank you for considering this new information.

I, Plaintiff Andrew U. D. Straw, verify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, that the above statements and factual representations are true and correct on penalty of perjury.

Respectfully submitted,

A handwritten signature in black ink that reads "Andrew U. D. Straw". The signature is written in a cursive style with a prominent horizontal line across the top.

/s/ ANDREW U. D. STRAW
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November 21, 2016

CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that I filed the above DECLARATION with the Clerk of this Court via the Court's CM/ECF system on November 21, 2016, and this DECLARATION will be served to all counsel of record through that CM/ECF system.

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Respectfully submitted,



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November 21, 2016