

I.

MISAPPLICATION OF A LINEAR-NO-THRESHOLD RISK MODEL (LNT) “THE VERITOX THEORY”

There is only one exposure model upon which the toxicity findings in the ACMT Mold Statement are primarily founded. Contrary to the above boxed-in and misleading sentence, there is no such thing as a scientifically established *“maximum inhalation dose of mycotoxins generally orders of magnitude lower than demonstrated thresholds for adverse health effects”* in humans exposed to mycotoxins in the indoor air. No *“demonstrated thresholds”* or permissible exposure limits (PEL) have ever been established for biocontaminants, including mycotoxins, in WDB by any route of exposure. Because of the complexity of WDB exposures and diversity of those exposed, it is scientifically not possible to establish thresholds and PELs by mere LNT.

The ACMT Mold Statement’s doubt-selling of causation of illness from mycotoxins by implied, yet nonexistent, establishment of an unattainable threshold is founded upon extrapolations applied to data taken in 2001 from one mechanistic study of an acute dose of mold (not mycotoxins) intratracheally instilled into rats’ lungs. That is the foundation for the above greatly flawed ACMT boxed-in sentence. The problematic LNT is hereafter referred to as the **“Veritox Theory”**, attached hereto as EXHIBIT 2.[7]

While causing vast harm to the public by promotion of the Veritox Theory, the following material facts are ignored: 1) unlike the research rats in the LNT model, humans in WDB may be exposed to multiple molds and mycotoxins for long periods of time; 2) via all routes of exposure simultaneously -- ingestion, inhalation & dermal contact; 3) synergistically with multiple biocontaminants [8]; and 4) because of the complexity of WDB exposures, the threshold for causation of human illness by individual component of the mixture is undeterminable by mere LNT model of one offending agent by one route of exposure.

Ignoring the above-noted real-world exposure-facts and promoting the false concept that an LNT establishes mycotoxins in WDB cannot reach a harmful level [9], the Veritox Theory claims:

“Levels of exposure in the indoor environment, dose-response data in animals, and dose-rate considerations suggest that delivery by the inhalation route of a toxic dose of mycotoxins in the indoor environment is highly unlikely at best, even for the hypothetically most vulnerable subpopulations.” [See EXHIBIT 2 fn 7]

“Nonprofit” medical associations have mass-marketed the Veritox Theory into medical and insurer policies and practices purposed toward selling doubt of liability for causation of illness and death in the courts. It is a collusive deception which has caused massive devastation. It is scientific fraud to unethically promote the belief that such work establishes environmentally injured people, their treating physicians, researchers, and attorneys are lying about what is making people sick from WDB exposures -- toward the goal of staving-off monetary liability for responsible-party WDB-stakeholders.[10] When the WDB-stakeholder is an insurer, as it often is, use of the Veritox Theory to deny liability in toxic torts then becomes discriminatory insurer fraud by use of scientific fraud upon the courts.

Please view fn 12, 13 & 14. They are trailers for the 2015 documentaries "*Moldy*" and "The Forgotten Plague" and a video statement regarding suicides among the environmentally disabled who are being disparaged by the U.S. mainstream medical communities. The videos, along with fn 15 describing the recent bullying and suicide of a WDB-injured teen, document the devastation occurring by hand of medical professionals misleading other medical professionals and courts to believe that the physically ill should be deemed mentally ill, hypochondriacs, or otherwise dishonest – based upon the mass-promotion of the "*garbage science*", "*litigation defense argument*" Veritox Theory. [11] [12] [13] [14] [15]

[7] **EXHIBIT 2 the "Veritox Theory"**: <http://freepdfhosting.com/74478c4cad.pdf>

[8] 2011 World Health Organization, "*Mycotoxins Children's Health and the Environment, WHO Training Package for the Health Sector*": "*Exposure to molds can also occur by ingestion, but also occurs via inhalation of contaminated air and dermal contact with surfaces on which they are deposited. Molds are ubiquitous in the outdoor environment and can enter the home through doorways, windows, air conditioning systems and heating and ventilation systems. Molds proliferate in environments that contain excessive moisture, such as from leaks in plumbing, roofs, walls, and pet urine and plant pots. The most common molds found indoors are Cladosporium, Penicillium, Aspergillus, and Alternaria. If a building is extremely wet for an extended period, other molds with higher water requirements, including Stachybotrys and Trichoderma species, can grow.*" [Page 10]
<http://www.who.int/ceh/capacity/mycotoxins.pdf>

[9] 2005 Trial testimony of Bruce J. Kelman falsely claiming while under oath that the Veritox Theory proves mycotoxins in WDB "*could not be*" the cause of debilitating illness. [Page 29]
<http://freepdfhosting.com/ec0fad16ee.pdf>

[10] 2007 Wall Street Journal, "*Court of Opinion, Amid Suits Over Mold Experts Wear Two Hats, Authors of Science Paper Often Cited by Defense Also Help in Litigation*"
<https://katysexposure.files.wordpress.com/2009/09/wsionlinejan92007.pdf>

[11] 2002 Email from ACOEM's Chair of the Scientific Advisory Board to BOD members referring to the Veritox Theory as "*garbage science*" & "*litigation defense argument*"
<http://freepdfhosting.com/bb400631a3.pdf>

[12] 2015 VIDEO documentary *MOLDY* <https://moldymovie.com/index?affiliate=3983>

[13] 2015 VIDEO documentary *The Forgotten Plague* <https://www.tugg.com/events/44775>

[14] 2015 VIDEO CFIDS Assoc. President Carol Head tells of suicides among the environmentally disabled.
<https://www.youtube.com/watch?v=JcvITFumS7E&feature=youtu.be>

[15] 2015 "*Mold injured teen commits suicide. Mother pleads for laws to protect children*" <http://wp.me/plYPz-3U9>