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January 12, 2016

Gina McCarthy, Director EPA  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Tom Frieden, Director CDC  
1600 Clifton Road  
Atlanta, GA 30329-4027

Senator Bernard Sanders  
Senator Patty Murray  
Senator Elizabeth Warren  
U.S. Senate HELP  
428 Senate Dirksen Bldg  
Washington, DC 20510

Dear Administrator McCarthy, Director Frieden and Senators Sanders, Murray and Warren,

RE: "Mold"<sup>1</sup> & Linear-risk-model "Veritox Theory"<sup>2</sup>. There is dire need for CDC & EPA to cease funding discrimination of the environmentally disabled via funding the "nonprofit" American College of Medical Toxicology (ACMT).

Greetings. I am an advocate for integrity in health marketing. Over a decade ago, I published a writing exposing how a fraudulent linear-dose-no-threshold (LNT) risk assessment model, the Veritox Theory, was being mass-marketed as appropriate education for U.S. physicians. The collusive endeavor was by well-connected "nonprofits" and toxic tort defense witnesses with close ties to NIOSH and industry. It was purposed to cause discrimination of those being disabled by Mold and to stave off liability for causation of the disablings and deaths. The greatly flawed LNT promotes the false concept it is proven microbial toxins in water damaged buildings will never rise to a level to harm human health.

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<sup>1</sup> California Health & Safety Code 17920(j) "Mold" means microscopic organisms or fungi that can grow in damp conditions in the interior of a building."

<sup>2</sup> Veritox Theory: "Adverse Human Health Effects Associated with Molds in the Indoor Environment Copyright © 2002 American College of Occupational and Environmental Medicine...In single-dose in vivo studies, *S. chartarum* spores have been administered intranasally to mice or intratracheally to rats. 76, 77 High doses (30 x 10<sup>6</sup> spores/kg and higher) produced pulmonary inflammation and hemorrhage in both species. A range of doses were administered in the rat studies and multiple, sensitive indices of effect were monitored, demonstrating a graded dose response with 3 x 10<sup>6</sup> spores/kg being a clear no-effect dose. Airborne *S. chartarum* spore concentrations that would deliver a comparable dose of spores can be estimated by assuming that all inhaled spores are retained and using standard default values for human subpopulations of particular interest<sup>78</sup> – very small infants,† school-age children,†† and adults.††† The no-effect dose in rats (3 x 10<sup>6</sup> spores/kg) corresponds to continuous 24-hour exposure to 2.1 x 10<sup>6</sup> spores/m<sup>3</sup> for infants, 6.6 x 10<sup>6</sup> spores/m<sup>3</sup> for a school-age child, or 15.3 x 10<sup>6</sup> spores/m<sup>3</sup> for an adult. If the no-effect 3 x 10<sup>6</sup> spores/kg intratracheal bolus dose in rats is regarded as a 1-minute administration (3 x 10<sup>6</sup> spores/kg/min), achieving the same dose rate in humans (using the same default assumptions as previously) would require airborne concentrations of 3.0 x 10<sup>9</sup> spores/m<sup>3</sup> for an infant, 9.5 x 10<sup>9</sup> spores/m<sup>3</sup> for a child, or 22.0 x 10<sup>9</sup> spores/m<sup>3</sup> for an adult. In a repeat-dose study, mice were given intranasal treatments twice weekly for three weeks with "highly toxic" *S. chartarum* spores at doses of 4.6 x 10<sup>6</sup> or 4.6 x 10<sup>4</sup> spores/kg (cumulative doses over three weeks of 2.8 x 10<sup>7</sup> or 2.8 x 10<sup>5</sup> spores/kg).<sup>79</sup> The higher dose caused severe inflammation with hemorrhage, while less severe inflammation, but no hemorrhage was seen at the lower dose of *S. chartarum* spores. Using the same assumptions as previously (and again ignoring dose rate implications), airborne *S. chartarum* spore concentrations that would deliver the nonhemorrhagic cumulative three-week dose of 2.8 x 10<sup>5</sup> spores/kg can be estimated as 9.4 x 10<sup>3</sup> spores/m<sup>3</sup> for infants, 29.3 x 10<sup>3</sup> spores/m<sup>3</sup> for a school-age child, and 68.0 x 10<sup>3</sup> spores/m<sup>3</sup> for adults (assuming exposure for 24 hours per day, 7 days per week, and 100% retention of spores). The preceding calculations suggest lower bound estimates of airborne *S. chartarum* spore concentrations corresponding to essentially no-effect acute and subchronic exposures. Those concentrations are not infeasible, but they are improbable and inconsistent with reported spore concentrations. For example, in data from 9,619 indoor air samples from 1,717 buildings, when *S. chartarum* was detected in indoor air (6% of the buildings surveyed) the median airborne concentration was 12 CFU/m<sup>3</sup> (95% CI 12 to 118 CFU/m<sup>3</sup>).<sup>80</sup> Despite its well-known ability to produce mycotoxins under appropriate growth conditions, years of intensive study have failed to establish exposure to *S. chartarum* in home, school, or office environments as a cause of adverse human health effects. 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."

Attached hereto as Exhibit is a voluminous letter sent to the ACMT Board of Directors in October of 2015. It and its working links may be read online at Katy's Exposure under the blog title of "*American College of Medical Toxicology, Choose Wisely to Sunset Your Mold Statement*" <http://wp.me/pLYPz-3VW>

For my extensive efforts over the past decade to try to stop government backed and funded discrimination of the environmentally disabled (which includes much time on Capitol Hill at U.S. Senate HELP when the late Senator Kennedy was Chair/Ranking Member and David Bowen was director) I have been driven into poverty, jailed by order of a California judge whose court had no subject matter jurisdiction, bodily harmed, given a false criminal FBI record and character assassinated beyond belief.

I currently have tens of thousands of dollars of interest accruing, fraudulent liens on my property by federal contractors; and a void permanent injunction - issued coram non jure - to never republish a sentence I never published in the first place. That sentence is: "*Dr. Kelman altered his under oath statements on the witness stand while he testified as a witness in an Oregon trial.*" Although I have made multiple requests to "public servant" policing agencies; to date no one has been punished for the criminal acts in the California courts purposed toward fleecing the U.S. public with a scientifically void LNT that was penned by federal contractors at Veritox, Inc. (Exhibit pages 32-37; 42-52)

Mr. Kelman (who altered his under oath statements when presented with prior testimony) is President of Veritox, Inc. (Exhibit pages 38-40) He is a co-creator of the LNT Veritox Theory. (Exhibit pages 1-5) The decade of retaliation under the color of law via fixed California Strategic Litigation Against Public Participation (SLAPP) has been to make me appear a liar for exposing the massive government-backed and used fraud while it has been aided and abetted to continue by the criminal means in the California courts. (Exhibit pages 32-41)

Plainly stated, this is one of the dirtiest tricks that the U.S. government, multiple private-sector "nonprofit" partners, well-connected toxic tort defense witnesses and corrupt California court officers have collusively ever played on the American public and worker. Yet, through it all I am still standing and speaking out -- unlike many for whom I first spoke out over a decade ago to protect their health and safety from Mold and fraudsters. Many Mold injured people who I have met over the past decade are now permanently disabled or deceased. They are unable to ask for public servant help on their own.

**I am not going away until the multi-billion dollar, discriminatory defrauding is made to stop. It is long past time for the CDC and EPA to cease funding the proliferation of the fraudulent and discriminatory LNT Veritox Theory as valid U.S. physician education. People are losing everything because of the widely marketed U.S. government-backed fraud in policy, physician education and courts.**

ACMT is a "nonprofit" medical association headquartered in Phoenix, AZ. They are federally funded by the EPA and CDC/ATSDR to disseminate scientific information to U.S. physicians which impact treatment (and mistreatment) of patients throughout the U.S. (Exhibit pages 58-60 ) Veritox, Inc. are federal contractors and toxic tort defense witnesses hired by the US Department of Justice. ( Exhibit pages 42-44 ) The corporation is co-owned by Bryan Hardin who is a retired Deputy Director of NIOSH. He is the co-creator of the debunked LNT Veritox Theory along with Bruce Kelman. (Exhibit pages 16-21)

Senate HELP has been aware of the problem of the fraud in policy and the discrimination it causes of the environmentally disabled for many years. Yet, nothing has been done to stop the proliferation and usage of the scientific fraud that is so harmful to the American public and worker. <sup>3</sup>(Exhibit pages 49-52)

People are experiencing chronic fatigue, multi-system/multi-symptom inflammations, and newly acquired environmental intolerances after exposure to Mold.<sup>4</sup> (Exhibit pages 8-11) They can get no help from US physicians, who have had it crammed down their throats by CDC funded “nonprofits” that it is proven the disabled are liars, mentally ill, and/or scammers. This concept is primarily founded upon the debunked – but still federally funded Veritox Theory in policies and courts. (Exhibit pages 14-15) The cost to society as a whole is in the billions. (Exhibit page 9)

In 2003, Mr. Hardin and Mr. Kelman (co-authors of the 2002 “nonprofit” American College of Occupational and Environmental Medicine ACOEM Mold Statement) accepted no less than \$25,000.00 to publish a mold statement for the U.S. Chamber Institute for Legal Reform and Manhattan Institute Center for Legal Policy. For this version of “science” they fraudulently claimed that the LNT Veritox Theory the “nonprofit” medical associations were also marketing, proved:

***“Thus, the notion that toxic mold is an insidious, secret killer as so many media reports and trial lawyers would claim, is junk science unsupported by actual scientific study.”*** (Exhibit pages 16-21)

Mr. Kelman, who should be in jail for his perjury as a plaintiff in the fixed California SLAPP while trying to silence me, is now writing the professional standards of knowledge for U.S. toxicologists with federal employees and “nonprofit” medical boards. The references he cites to adhere to professional standards discredits his own misapplication of the Veritox Theory as junk science. (Exhibit pages 56-57)

My enclosed October letter to the federally-funded ACMT was a request that they sunset their scientifically void position statement on Mold which relies heavily upon Mr. Kelman’s Veritox Theory to cause the deadly discrimination. (Exhibit pages 1-7). ACMT’s Mold Statement was co-authored in 2006 by expert defense witnesses in mold litigation also affiliated with VeriTox, Inc. (Exhibit pages 1-7)

The other two “nonprofit” medical associations which have actively participated in fraudulently legitimizing and mass-marketing the Veritox Theory (ACOEM and American Academy of Allergy, Asthma and Immunology AAAAI) have already sunset their Mold Statements. (Exhibit pages 12-14)

ACMT is the last crooked man standing who is still marketing Mr. Kelman’s and Mr. Hardin’s science fraud over Mold, by medical association position statement. To date, I have received no reply from ACMT as to their intent to cease marketing discrimination of the environmentally disabled -- as the federally-funded-scientific-fraud they are selling plays on to harm many. (Exhibit pages 53-55)

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<sup>3</sup> The following was deleted in February 2007 from a federal audit of Mold that Senator Kennedy ordered in October 2006: ***“What medical and scientific standards are used in determining the admissibility of evidence of both acute and persistent health consequences resulting from exposure to mold? Which individuals and organizations have promulgated these standards and what, if any, conflicts of interest exist regarding these standards?”*** <http://freepdfhosting.com/f18db049a6.pdf>

<sup>4</sup> 1998, U.S. Congressman Bernard Sanders speaking before the House. “MCS is a chronic condition marked by heightened sensitivity to multiple different chemicals and other irritants at or below previously tolerated levels of exposure....MCS is often accompanied by impaired balance, memory and concentration.” <http://someoneskid.angelfire.com/boycottsbu2000/RepSandersChemicalSensitivity.html>

CDC/ATSDR is “mandated by congress to perform certain actions relating to the public health concerns of hazardous substances in the environment”. Although ATSDR is an independent operating division within the Department of Health and Human Services, the Centers for Disease Control and Prevention (CDC) performs many of its administrative functions.

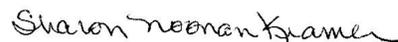
The “nonprofit” medical association ACMT is receiving federal funds to educate -not miseducate -United States physicians, health departments, the general public, and other medical “nonprofit” associations - such as the Pediatric Environmental Health Specialty Units (PEHSU) and the Association of Occupational and Environmental Clinics (AOEC).

Given the influence which ACMT exerts over public health policies and physician education with the use of federal and private-sector funds and close ties to the CDC/EPA, it is imperative that ACMT be made to cease disseminating discriminatory scientific fraud over environmental illnesses from Mold (Exhibit pages 62-63)

As such, for the sake of public and worker health and safety, please cease federally funding ACMT to curtail the mass dissemination of a debunked litigation defense argument in physician education and U.S. courts – the Veritox Theory. Fourteen years of this discriminatory fraud being propagated by federal contractors who are funded by ATSDR/CDC/EPA is a cost that the public should not have to bear with their tax dollars – as lives are destroyed from the government funded, mass-marketed fraud.

Thank you for your prompt attention to this matter. I look forward to hearing what the leaders of this country intend to do to stop the discrimination of the Mold disabled and dying; and to stop the two-tiered justice system in the United States and California.

Sincerely,



Enclosure (1)

Mrs. Sharon Noonan Kramer

CC (sans enclosure which they already have):

U.S. Secretary Sylvia Mathews Burwell, Department of Health & Human Services

U.S. Attorney General Loretta Lynch

U.S. Deputy Attorney General Sally Quinlian Yates

U.S. Southern District of California Attorney Laura Duffy

Director of California Department of Public Health

California Governor Jerry Brown<sup>5</sup>

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<sup>5</sup> January 2016 “California ~ Choose Wisely to Stop Science Frauds In Policy over Mold Illnesses”  
<https://katysexposure.wordpress.com/2015/12/24/california-choose-wisely-to-stop-science-frauds-in-policy-over-mold-illnesses/>