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N.D. OF ALABAMA

DECLARATION OF LEE MERRITT, MD

Pursuant to 28 U.S.C. § 1746, Lee Merritt, M.D. hereby declares:

I am fully competent to make this declaration and I have personal knowledge of the facts stated in this declaration.

This declaration is submitted in support of legal actions regarding the COVID-19 injections and to revoke the emergency use authorization for COVID-19 injections.

I am an orthopaedic surgeon licensed in Iowa and Nebraska. I have a practice in Nebraska.

The following is a sample of an Informed Consent that I would do for COVID-19 vaccines:

The COVID-19 vaccines are experimental and only authorized under an Emergency Use Authorization. This means that this particular vaccine has not been fully studied and we cannot be certain of all of the impacts it could have on you.

Risks of the COVID vaccination include but are not limited to: death, failure to prevent the disease being vaccinated against, risk of anaphylaxis, irritation at the injection site, muscle soreness, tingling in the hand and/ or arm, bleeding from the injection site, other bleeding that may be life-threatening such as brain hemorrhage, internal bleeding, bleeding into the eye, gastrointestinal bleeding, neurologic complications including paralysis that may or may not completely resolve, focal paralysis such as Bell's palsy, transverse myelitis, Amyotrophic Lateral Sclerosis (Lou Gehrig's disease), headaches, dizziness, narcolepsy (inability to remain awake), thrombocytopenia (lack of platelets that prevent bleeding, pancytopenia (lack of all blood elements such as red and white blood cells, infection, miscarriage, blood clots, etc.

Additionally, problems may arise even years after vaccinations. These issues may include "immune enhancement" in which case the vaccination may cause increased risk of severe or fatal worsening of COVID or other similar diseases and influenza like illnesses. Also, the risk of infertility, birth defects, and cancer is unknown, and late onset of neurologic disorders, autoimmune disease.

There have been reports of passage of the vaccine in breast milk that caused fatal bleeding in a nursing baby.

The benefit of this vaccination is an overall absolute risk reduction of negative outcomes of approximately 1% and the potential to have lesser severity of symptoms if you do catch COVID-19 (which may still happen).

Please sign here if you consent to this injection.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 1 , 2021.

Lee D. Merritt MD (Jun 1, 2021 13:06 CDT)

Lee Merritt, MD

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Declaration of Lee Merritt MD

Final Audit Report

2021-06-01

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Lee D. Merritt (ne: Hieb) MD

Orthopaedic Surgery

Surgery of the Spine

18111 Q Street, Omaha, NE. 68135 402-660-7161

CURRICULUM VITAE

Mar 19, 2020

GRADUATE MEDICAL EDUCATION:

Fellowship:

Louis A. Goldstein Fellow of Spinal Surgery

University of Rochester, Rochester, New York

1989-1990.

Residency:

Orthopaedics, Naval Hospital San Diego, California

1983-1987.

Internship:

Internal Medicine, National Naval Medical Center

Bethesda, Maryland, 1980-1981.

Medical Degree:

University of Rochester School of Medicine and Dentistry

Rochester, New York 1976-1980.

ADDITIONAL GRADUATE MEDICAL EDUCATION

Fellowship:

American Academy of Anti-Aging Medicine, completed 2005

UNDERGRADUATE EDUCATION:

Grinnell College, Grinnell, Iowa. 1969-1973

University of Iowa, Iowa City, Iowa. 1975-1976

AWARDS/OTHER ACCOMPLISHMENTS:

Alpha Omega Honor Medical Society, 1980.

American Medical Women's Association Award for Academic Achievement, 1980.

National Honor Society 1969

APPOINTMENTS:

President, Association of American Physicians and Surgeons 2010-2011

Chairman of Credentialing, Yuma Regional Medical Center 2005- 2007

Chief of Staff, Yuma Regional Medical Center, 2001-2003.

Chief of Surgery, Yuma Regional Medical Center, 1998-1999.

Spine-Tech Faculty Consultant, 1997-1998.

Consultant, Naval Studies Board, 1995-1999.

Executive Appointment to Naval Research Advisory Committee, 1993-1995.

PRACTICE EXPERIENCE:

Orthopaedic Trauma Coverage, various hospitals via Locum Tenens, 2016-2018

Private Practice, Anti-Aging Medicine, Esthetics, Outpatient Orthopaedics, Enlighten Omaha, NE. 2016- Present

Orthopaedic and Spinal Surgeon, Burgess Hospital Center, Onawa, Iowa, July 2015 - 2021

Orthopaedic and Spinal Surgeon, Stewart Memorial Hospital, Lake City, Iowa, 15 June 2009 to 15 November 2014

Private Practice, Spinal Surgery and Trauma, Yuma Regional Medical Center, Yuma, Arizona, 1995 to 2009

Prince Georges Orthopaedic Associates, Clinton, Maryland, Southern Maryland Hospital Center. private group practice, Orthopaedic and Spinal Surgeon, 1992-1993.

Orthopaedic Surgeon, Naval Hospital Cherry Point, North Carolina, 1991-1992 (DOD civilian contract). General practice with emphasis on spinal disorders and sports medicine.

(Active Duty USN) Orthopaedic Surgeon, Naval Hospital Camp Lejeune, North Carolina, 1987-1989.

(Active Duty USN) General Practice. General Medical Office with United States Navy Quantico, Virginia (Department Head) 1982-1983. Iwakuni, Japan (Department Head) 1981-1982.

BIBLIOGRAPHY:

Reports of Bleeding and Thrombocytopenia Reported to VAERS after Moderna and COVID-19 Vaccinations, Dec 15, 2020, to Mar 12, 2021, Merritt L, Journal AAPS, Vol. 26, No.2, Summer 2021, p 51-54.

<u>"Wrong Site Surgery"</u>, L. Hieb, Letter to the Editor, Orthopaedics, Vol 26, No. 2, Feb 2003, pg. 124.

Interbody Fusion in the Elderly, Chapter 21, <u>Advances in Spinal Fusion-Molecular Science, Biomechanics and Clinical Management</u>, L. Hieb, Marcel Dekker, Inc. Nov 2003, pg. 293-312.

"Spontaneous Posteroperative Cerebrospinal Fluid Leaks Following Application of Anti-Adhesion Barrier Gel. Case Report and Review of the Literature." Hieb, Stevens. Spine, April 2001, pg. 748-751.

"Tri Care From the Inside and Out", L. Hieb, Naval Institute Proceedings, Nov 2000, pg. 62-65.

Naval Expeditionary Logistics, Enabling Operational Maneuvers from the Sea. Panel report, Naval Studies Board, (Member) Committee on Naval Expeditionary Logistics, 2000.

<u>"Telemedicine, Applying and Misapplying a Concept."</u> L. Hieb. Naval Institute Proceedings, January 1997, pg. 74-75.

<u>Technology for the United States Navy and Marine Corps 2000-2035, Becoming a 21st Century Force, Vol 4 Human Resources", Panel on Human Resources, Naval Studies Board, 1997.</u>

Acute Bilateral Tibial Compartment Syndrome, Report of a Case and Review of the Literature. L. Hieb, Alexander. Clinical orthopaedics and related research, March 1987, pg. 190-193.

PRESENTATIONS/UNPUBLISHED PAPERS:

"Healos Collagen Matrix and Lumbar Interbody Fusion Cages: A 2-year Outcome Study." Macenski, Hieb, Lim, McAfee, Poster Presentation, Meeting of the Americas II, New York, NY, 2002.

<u>"Safety of Interbody Fusion in the Elderly."</u> Hieb, Stevens, Macenski, 2001. Presented at the North American Spine Society Annual Meeting, Nov 2001.

"Healos Mineralized Collagen Matrix Combined with Lumbar Interbody Fusion Cages." Poster Presentation, Congress of Neurologic Surgeons, 51st Annual Meeting, San Diego,

California 2001.

<u>Computerized Tomography in the Evaluation of Cervical and Lumbar Spinal Fractures-Does it Make a Difference?</u> Hieb, Chan, Devanny, Knight, Doerschuk. ASIA 1992. AAOS 1993.

<u>Influence of Pedicle Fixation on Postoperative Pain</u>. Knight, Hieb. Poster presentation at the Scoliosis Research Society/North American Spine Society Pedicle Fixation Workshop, May 1991. <u>Sacral Pedicle Fixation for Short Segment Spinal Fusion</u>. Ibid.

Neurofibromatosis: Post Laminectomy Kyphosis of the Cervical Spine with Anterior Cord Syndrome. Case Report and Literature Review. Knight, Hieb. American Spinal Injury Association, 1991. Also presented SRS 1991.

<u>Intersegmental Fixation with Luque Plating for Degenerative Lumbar Disc Disease.</u> Knight, Montgomery, Hieb, Wujciak. Fifth International Conference on Lumbar Fusion and Stabilization, Osaka, Japan, 1991.

<u>Open Door Laminoplasty for Multilevel Cervical Spondylosis</u>. Knight, Hieb. Videotape American Academy of Orthopaedic Surgeons. 58th Annual Meeting. 1991.

Laminoplasty for Treatment of Multilevel Cervical Stenosis. Knight, Hieb. ASIA 1991.

<u>Complex Fracture of the Proximal Sacrum.</u> Case Report and Presentation of a Method for <u>Fixation</u>. Poster presentation. Hieb, Knight. ASIA 1990.

Pedicle Screw Fixation-Effects on Lumbar Lordosis and the Incidence of Aberrant Screw Placement: Assessment of Early Results. Knight, Chan, Devanny, Jackman, Montgomery, Hieb. SRS/NASS Advanced Course on Pedicular Fixation, 1990.

<u>Pilon Fractures of the Ankle, Review of the Literature and the Experience at Naval Hospital San Diego.</u> Resident research paper presented to the Departments of Orthopaedic Surgery of the Naval Hospital San Diego, and the University of California, San Diego, 1985.

<u>Computerized Tomography versus Myelography in the Diagnosis of Lumbar Disc Disease</u>. Resident research paper presented to the Department of Orthopaedics and Radiology, Naval Hospital Oakland, California, 1984.

RESEARCH PROJECTS:

Pain amelioration from Stem Cells/ Peptide Therapy, Current

Stabilization of the Lumbar Spine in the Elderly Patients, 1999-2001

Restoration of Lordosis following Anterior Cervical Fusion using BAK Cylindrical Cages,

2002.

Effect of Anterior Discectomy and Bone Grafting on the Geometry of the Cervical Neural Foramina. Strong Memorial Hospital, Rochester, New York, 1990.

Real Time Physiology of Gas Transport in Humans Utilizing Parotid Secretion. Navy Undersea Medical Research Institute, 1978.

Electron Microscopy of Solid Tumors. University of Rochester, Department of Histology, 1977.

CERTIFICATION AND LICENSURE:

Recertification, NBPAS through April 30, 2021

Recertification, American Board of Orthopaedic Surgery, 2000, 2010

Board Certified, Orthopaedic Surgery, 1989.

Diplomat, National Board of Medical Examiners, 1981.

Current State Licensure:

Iowa 2000 Nebraska 2001

SCHOLARSHIPS:

United States Medicine Health Professions Scholarship, 1976-1980.

Cancer Institute Summer Fellowship, University of Rochester, 1981.