

"UHA 6"

AFFIDAVIT

I, the undersigned (Petra Morum) do hereby declare the following under oath:

1.

I am an adult female with US Passport number 488471097 residing at 12 Knelsby Avenue, Hillcrest with home number 0869990780 and with mobile number 0798787044.

2.

I have often travelled past the Shongweni Landfill (the Dump) when going to and from the Shongweni Farmers Market. Whenever the wind blows from the Landfill towards the car, we smell a distinctly powerful chemical stench. It is this, easily identifiable, stench that I recognise when I smell the same foul air at my house as well as throughout Hillcrest when the wind is blowing in a Southerly direction (i.e. coming from the Dump towards my home).

I have noticed that whenever the wind has a Southerly component to it, the smell arrives. It is extremely powerful and has caused many health issues for my family and for me personally. It is a very strong, disgusting odour that I can only describe as a combination of rotting rubbish and potent chemicals. It is the worst smell I have ever experienced – and the natural reaction is to want to get away from it as quickly as possible. It has woken me up in the middle of the night on many occasions. It is distinct – and I positively recognise the smell as being the exact same smell I have experienced next to the Dump when the wind has been blowing from the dump towards me.

As soon as the UHA website became available I started reporting the smell via the UHA complaint app and website. I have reported it many times – and I try to report it each time the smell arrives although this is not always practical so there are also many days the smell arrives and I do not submit a complaint. There are some weeks when I smell it every single day. On some days, it lingers and is always there throughout the day in my house in every single room – and on other days it comes and goes multiple times in a day.

About 18 months ago, I started to develop severe joint pain throughout my body. It has become progressively worse since then, and it now so bad that on some days I am bed-ridden. I have had some autoimmune-related medical issues in the past such as eczema as a child and very mild joint pain for about 10 years but prior to smelling the stench from the dump it has always been very mild and only occurred in a single joint and only very occasionally. It has previously been more of an inconvenience than the debilitating condition that it has developed into. I am in a continual state of deteriorating health and nothing I can do seems to stop the progression of my joint pain.

My husband experiences a sore throat within half an hour of the smell arriving, and my joints such as those in my knuckles swell up visibly within about 20 minutes of the smell and I usually get a headache, coupled with nausea and fatigue.


About 14 months ago I started seeing Dr Catherine Knight as well as Dr Hennie Palm when my health started deteriorating. I have spent more than a hundred thousand Rands with these Doctors to try and get healthy.

After not getting any better from seeing these doctors, I decided to fly to the Environmental Health Centre (EHC) in Dallas, Texas in the USA to see if they could help me. I spent more than US\$25,000 going there and am flying back to

*Handwritten signature*

see them again in a few weeks which will result in more expenditure. The reason I am going back is that I received some horrifying results of blood tests the clinic initiated – exposing high and dangerous levels of Volatile Solvents in my bloodstream. The Doctor called me last night from the USA and said that he had never seen results like mine before and they are extremely dangerous to my health. He recommended that I remove myself immediately from my home environment to get away from the source of the problem so that I can start the healing process. I have attached this blood test lab report to my affidavit. It must be noted that I intend submitting supplementary expert affidavits from my Doctors as well as from the laboratory conducting these tests as soon as they become available.

As a result of my deteriorating immunity, I have developed many allergies to foods which became evident after three weeks of skin-prick testing at the EHC. Today my husband gives me daily injections of antigens developed specifically for me by the EHC to help my body cope with foods. Under the EHC's instructions I am not allowed to eat any one food more than once in a 4 day period in order to avoid developing a new allergy to that specific food so my diet is extremely restrictive now. I am also not allowed to eat more than one food per food group in a 48 hour period. I am unable to go to a restaurant for a meal as a result of my situation and I no longer have a normal social life as a result. I have also had two failed IVF attempts in the past two years, and my Doctor told me to stop trying because of my poor state of health. I am no longer able to wear my engagement and wedding rings because of my swollen knuckles.

  
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(Signature of the deponent)

I certify that the above affidavit was signed and sworn before me on 25 APRIL 2017 at KLOOF in..... and the deponents signature placed thereon in my presence. The deponent acknowledged that he knows and understands the contents of this affidavit, that he has no objections to taking the prescribed oath and that he considers the prescribed oath to be binding on his conscience.

  
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**COMMISSIONER OF OATHS**

**FULL NAMES:**

**TASVEERA RAMKARAN**  
COMMISSIONER OF OATHS  
PRACTISING ATTORNEY, NOTARY  
& CONVEYANCER - R.S.A.  
76 OLD MAIN ROAD, KLOOF

**ADDRESS:**

**CAPACITY:**



# Environmental Health Center — Dallas

8345 Walnut Hill Lane, Suite 205, Dallas, Texas 75231 • Telephone — (214) 368-4132 — FAX: (214) 691-8432

Date: 9/28/97

Patient Name: Julio Martinez

This is your most recent laboratory report(s), which have been reviewed. Please be advised of the following:

- Normal
- Please schedule an office visit for local patients or a phone consultation for out of state patients with our appointment desk at 214/368-4132 to discuss your lab report(s) with your attending physician.
- Abnormality does not require a doctor's appointment.

Follow-up may be needed at a later date.

Comments:

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3425 Corporate Way  
Duluth, GA 30096



Patient: PETRA  
MORUM  
DOB: February 13, 1975  
Sex: F  
MRN: 1232740643

Order Number: K6140567  
Completed: March 08, 2017  
Received: February 14, 2017  
Collected: February 13, 2017

Environmental Health Cntr of Dallas  
William Rea MD  
8345 Walnut Hill Ln  
Ste 220  
Dallas, TX 75231-4205

1766 Toxic Effects CORE Profile - Blood/Urine

Methodology: Gas Chromatography/Mass Spectrometry, LC/Tandem Mass Spectrometry, Colorimetric

Summary of Toxins found at or above the 95th percentile

Blood Assessment		Urine Assessment
<b>Elevated Volatile Solvents</b> Ethylbenzene Styrene m,p-Xylene o-Xylene  <b>Elevated Chlorinated Pesticides</b> No elevations found at or above the 95th percentile.	<b>Elevated Polychlorinated Biphenyls (PCBs)</b>  No elevations found at or above the 95th percentile.	<b>Elevated Organophosphates</b> No elevations found at or above the 95th percentile.  <b>Elevated Bisphenol A and Compound:</b> No elevations found at or above the 95th percentile.  <b>Elevated Phthalates and Parabens</b> No elevations found at or above the 95th percentile.
*Includes detected values which may not be at or above the 95th percentile.		
Cholesterol 140 Triglycerides 36 Total Lipids (calc) 4	<=200 mg/dL 35-160 mg/dL g/dL	Creatinine = 159 mg/dL

Finding a measurable amount of one or more toxins does not mean that adverse health effects are present, therefore no levels are flagged as abnormal.

These levels provide a reference range to determine whether an individual has been exposed to higher levels of toxicants than found in the general population.

1795 Toxic Effects CORE Profile - Blood/Urine

Volatile Solvents  
ENVIRONMENTAL

	Results ng/mL	Percentile			
		50th	75th	90th	95th
<b>Volatile Solvents - Whole Blood</b>					
1. Benzene	0.25	<DL	0.05	0.17	0.28
2. Ethylbenzene	2.43	<DL	0.05	0.98	0.11
3. Styrene	0.21	<DL	0.05	0.09	0.12
4. Toluene	<DL	<DL	<DL	0.43	0.68
5. m,p-Xylene	3.73	0.13	0.2	0.28	0.34
6. o-Xylene	1.91	<DL	0.051	0.072	0.09
Percentile values are from the NHANES Fourth National Report on Human Exposure to Environmental Chemicals, Updated Tables, CDC, 2009					
7. Hexane	49	236	304	380	418
8. 2-Methylpentane	8	52	63	76	88
9. 3-Methylpentane	21	105	148	142	164
10. Iso-octane	1.3	7.6	8.6	9.6	10.2

No national reference ranges are established for hexane, 2- and 3-methylpentane and iso-octane. Percentile ranges are based on patient samples analyzed by Genova Diagnostics.

<DL = less than detection limit  
>UL = greater than upper linearity limit

1795 Toxic Effects CORE Profile - Blood/Urine

**Chlorinated Pesticides**  
**ENVIRONMENTAL**

**Chlorinated Pesticides - Serum**

	Results ppb	95th Percentile** ppb	Lipid Adjusted Results ng/g lipid	95th Percentile** ng/g lipid
11. DDE	Detected 1.04	12.1	Detected 294.9	1,860
12. DDT	Not Detected	0.13	N/A	19.5
13. Dieldrin	Not Detected	0.14	N/A	19.0
14. Heptachlor Epoxide	Not Detected	0.13	N/A	18.9
15. Hexachlorobenzene (HCB)	Not Detected	0.19	N/A	28.9
16. Mirex	Not Detected	0.09	N/A	13.2
17. Oxychlorane	Not Detected	0.27	N/A	37.7
18. Trans-Nonachlor	Not Detected	0.47	N/A	68.3
19. Endosulfan Sulfate	Not Detected	N/A	N/A	N/A

No national percentiles have been set for endosulfan sulfate. Detected levels are above the Genova Diagnostics limit of detection (0.10 ppb).

**PCBs**  
**ENVIRONMENTAL**

**Polychlorinated Biphenyls (PCBs) - Serum**

	Results ppb	95th Percentile** ppb	Lipid Adjusted Results ng/g lipid	95th Percentile** ng/g lipid
<b>Dioxin-like Polychlorinated Biphenyls</b>				
20. PCB 118	Not Detected	0.22	N/A	31.3
21. PCB 126	Not Detected	0.00048	N/A	0.069
22. PCB 156	Not Detected	0.10	N/A	15.3
23. PCB 169	Not Detected	0.00027	N/A	0.041
24. PCB 77	Not Detected	N/A	N/A	N/A

No national percentiles have been set for PCB 77. Detected levels are above the Genova Diagnostics limit of detection (0.02 ppb).

**Non-Dioxin-like Polychlorinated Biphenyls**

25. PCB 74	Not Detected	0.15	N/A	22.3
26. PCB 138	Not Detected	0.48	N/A	75.3
27. PCB 153	Detected 0.10 - 0.32*	0.62	Detected 25.0 - 80.0*	97.1
28. PCB 180	Detected 0.30	0.53	Detected 86.1	81.5

\*Patient value falls within this range.

\*\*95th percentile values are from the NHANES Fourth National Report on Human Exposure to Environmental Chemicals, CDC, 2009

**Organophosphates**  
**ENVIRONMENTAL**

	Results mcg/gm creatinine	Percentile			
		50th	75th	90th	95th
<b>Organophosphates - Urine</b>					
29. Dimethylthiophosphate (DMTP)	<DL	1.9	5.2	15.7	30.4
30. Dimethyldithiophosphate (DMDTP)	<DL	<DL	0.6	2.14	5.77
31. Diethylthiophosphate (DETP)	<DL	<DL	0.7	1.47	2.02
32. Diethyldithiophosphate (DEOTP)	<DL	<DL	<DL	<DL	0.41
33. Atrazine	<DL	<DL	<DL	<DL	<DL
34. Atrazine Mercapturate	<DL	<DL	<DL	<DL	0.072

Percentile values for organophosphates are from the NHANES Fourth National Report on Human Exposure to Environmental Chemicals, CDC, 2009.

No national reference ranges are established for atrazine or atrazine mercapturate. Percentile ranges are based on patient samples analyzed by Genova Diagnostics.

**Bisphenol A**  
**ENVIRONMENTAL**

	Results mcg/gm creatinine	Percentile			
		50th	75th	90th	95th
<b>Bisphenol A (BPA) - Urine</b>					
35. 4-Nonylphenol	<DL	<DL	<DL	1.11	4.69
36. Bisphenol A	0.70	1.05	3.05	6.09	10
37. Triclosan	4	12	50	203	443

Percentile values are from the NHANES Fourth National Report on Human Exposure to Environmental Chemicals, Updated Tables, CDC, Feb 2011.

No national reference ranges are established for 4-Nonylphenol. Percentile ranges are based on patient samples analyzed by Genova Diagnostics.

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 >UL = greater than upper linearity limit

**Phthalates & Parabens**  
**ENVIRONMENTAL**

**Phthalates and Parabens - Urine**

	Results mcg/gm creatinine	Percentile			
		50th	75th	90th	95th
<b>Phthalates - Metabolites of DEHP (Di-2-ethylhexyl phthalate)</b>					
38. MEHHP	2	19	41	90	179
39. MEHP	1.4	2.4	5.2	11.8	22.1
40. MECPP	<DL	11	22	53	107
41. MEP	36	115	312	855	1,500
<b>Parabens</b>					
42. Butylparaben	3.3	<DL	1.2	9.4	23.1
43. Ethylparaben	2.8	<DL	5.5	32.7	78.8
44. Methylparaben	38	61	228	505	817
45. Propylparaben	3	0	50	120	235

Percentile values are from the NHANES Fourth National Report on Human Exposure to Environmental Chemicals, Updated Tables, CDC, Feb 2011.

<DL = less than detection limit  
>UL = greater than upper linearity limit

This test has been developed and its performance characteristics determined by Genova Diagnostics, Inc. It has not been cleared or approved by the U.S. Food and Drug Administration.