

### Affidavit of Dr. Joan Duwve

I, Joan Duwve, state under penalty of perjury that the following facts are true:

1. In 1994, I received a medical degree from The Johns Hopkins University School of Medicine. I am licensed to practice medicine in Indiana. I am currently employed by the Indiana Department of Health as the Medical Director for Public Health and Preparedness.
2. In the course of my education, training and experience, I have learned about the effects of lead on the human body.
3. Lead is a known human toxin. There is no known "safe" level of lead. Levels as low as 5 mcg/ dl result in loss of IQ points, and are associated with learning and behavioral problems in children. Very high lead levels can cause devastating health consequences, including seizures, coma, and death.
4. Lead readily crosses the immature blood-brain barrier of young children, causing irreversible neurological damage at very low levels.
5. Lead is rapidly absorbed by bone, where it is stored for decades. With normal bone turnover, low levels of lead are released from bone into the blood stream continuously in a lead-poisoned person. During periods of active metabolism, such as childhood growth spurts, pregnancy, or bone loss due to osteoporosis, higher levels of lead are released back into the blood.
6. In pregnant women, lead in blood easily crosses the placenta, also poisoning the unborn fetus.
7. Lead poisoning is most often caused by ingesting lead, through mouthing hands or objects contaminated with lead, eating leaded paint chips or soil containing lead dust in and around deteriorating housing, or drinking water contaminated with lead from old pipes.
8. Lead poisoning can also be caused by inhaling lead-containing dust particles, especially during renovation of houses with lead paint.
9. The effects of lead poisoning are irreversible, and include learning and behavioral problems, decreased IQ, neurologic disorders, kidney damage, anemia, delayed growth, delayed puberty, infertility, seizures, and death.
10. The symptoms of lead poisoning at low levels can be vague and nonspecific. These include fatigue, hyperactivity, decreased appetite, sleep

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problems, and constipation. Symptom onset is often insidious, making lead poisoning difficult to detect.

11. Lead poisoned children are most often identified through recommended routine screenings.

12. Lead hazards in homes are usually found only after a child has been identified as lead poisoned.

13. Lead poisoning is a preventable environmental health problem. Proper elimination of known lead hazards from homes is essential to prevent additional harm to already poisoned children, and the subsequent poisoning of children not yet effected.

Date: 11/6/09

  
Dr. Joan Duwve MD, MPH