

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

The American Tradition Institute  
Environmental Law Center  
9033 Brook Ford Rd.  
Burke, VA 22015

Plaintiffs,

v.

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY and  
LISA P. JACKSON, ADMINISTRATOR  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460,

Defendants.

Civil Action No. \_\_\_\_\_

**DECLARATION OF STEVEN J. MILLOY**

I, Steven J. Milloy, under penalty of perjury and in accordance with 28 U.S.C. § 1746, declare as follows:

1. I reside at 12309 Briarbush Lane, Potomac, Maryland 20854 and make this Declaration based upon my personal experience.
2. One of the great horrors my family and I suffer is the memory of the incarceration of Zoran Galkanovic, my uncle, at the Mauthausen concentration camp. Upon threat of death, he was forced to rise each morning and identify those individuals at the concentration camp too ill to work, knowing they would subsequently be executed. I have accepted as a family responsibility the fight against any government who subjects its citizens to inhumane treatment.
3. German physicians conducted large-scale human experimentation at Mauthausen.

“German doctors subjected Mauthausen prisoners to pseudoscientific medical experiments, including testing levels of testosterone, experimenting with delousing chemicals, medicines for tuberculosis, and nutrition experiments. Camp physician Hermann Richter surgically removed significant organs--e.g., stomach, liver, or kidneys--from living prisoners solely in order to determine how long a prisoner could survive without the organ in question. Eduard Krebsbach, the executive camp doctor between autumn 1941 and autumn 1943, killed an undetermined number of prisoners by injecting phenol directly into their hearts.” [U.S. Holocaust Memorial Museum, “Mauthausen Killing Operations,” *Holocaust Encyclopedia*, <http://www.ushmm.org/wlc/en/article.php?ModuleId=10007729> (accessed September 11, 2012)]. “It was behind the gray stone walls of Mauthausen, in his native Austria, that Dr. [Aribert] Heim committed the atrocities against hundreds of Jews and others that earned him the nickname Dr. Death and his status as the most wanted Nazi war criminal still believed by the Simon Wiesenthal Center to be at large. Dr. Heim was accused of performing operations on prisoners without anesthesia; removing organs from healthy inmates, then leaving them to die on the operating table; injecting poison, including gasoline, into the hearts of others; and taking the skull of at least one victim as a souvenir. [*New York Times*, “Uncovering Lost Path of the Most Wanted Nazi,” February 4, 2009].

4. After learning of how the U.S. Environmental Protection Agency (EPA) was risking the lives and health of human study subjects and was failing to honestly represent the nature of the human experimentation that is the subject of the instant matter, I was appalled by this inhumanity. I have dedicated a majority of my current work effort to expose and stop the EPA’s improper, unethical and illegal human experimentation.

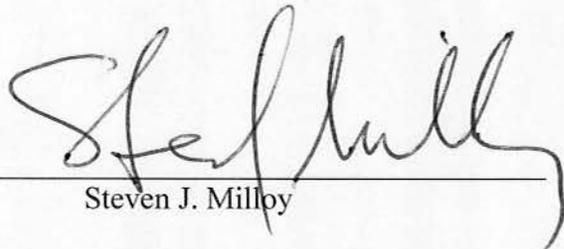
5. I am deeply aggrieved by the kind of human experimentation being conducted by

the U.S. Environmental Protection Agency and will not be relieved until it stops.

6. I own and maintain two websites dedicated to exposing government excess and dishonest science. Since 1996, JunkScience.com (<http://www.junkscience.com>) has been dedicated to exposing the abuse of science by special interests, including the EPA. Since September 2012, EPAHumanTesting.com (<http://www.epahumantesting.com>) has focused on exposing EPA's unlawful and immoral failure to protect human study subjects. These efforts reflect my dedication to ensuring honest, ethical government, especially in cases where the government engages in science and human experimentation.

7. The American Tradition Institute and its Law Center were formed to find and challenge at law governmental actions that violate the core principles of good science, honest government and the rights of citizens and man. I am a member of the American Tradition Institute because I support and join with those who share the purposes of the Institute.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. This declaration was executed on the eleventh day of September, 2012.



Steven J. Milloy