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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VIETNAM VETERANS OF AMERICA, a Non-Profit Corporation; SWORDS TO PLOWSHARES: VETERANS RIGHTS ORGANIZATION, a California Non-Profit Corporation; BRUCE PRICE; FRANKLIN D. ROCHELLE; LARRY MEIROW; ERIC P. MUTH; DAVID C. DUFRANE; WRAY C. FORREST; TIM MICHAEL JOSEPHS; and WILLIAM BLAZINSKI, individually, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

CENTRAL INTELLIGENCE AGENCY; DAVID H. PETRAEUS, Director of the Central Intelligence Agency; UNITED STATES DEPARTMENT OF DEFENSE; LEON PANETTA, Secretary of Defense; UNITED STATES DEPARTMENT OF THE ARMY; JOHN MCHUGH, United States Secretary of the Army; UNITED STATES DEPARTMENT OF VETERANS AFFAIRS; and ERIC K. SHINSEKI, UNITED STATES SECRETARY OF VETERANS AFFAIRS,

Defendants.

Case No. CV 09-0037-CW

EXPERT REPORT OF JEFFREY D. LASKIN, PH.D.

1 **I. INTRODUCTION**

2 **A. Retention**

3 1. I have been retained by Morrison & Foerster LLP on behalf of its clients, plaintiffs
4 in this matter, Vietnam Veterans of America, Swords to Plowshares: Veterans Rights
5 Organization, Bruce Price, Franklin D. Rochelle, Larry Meirow, Eric P. Muth, David C. Dufrane,
6 Wray C. Forrest, Tim Michael Josephs, and William Blazinski (collectively “Plaintiffs”) to serve
7 as a consultant and expert witness in the above captioned action.

8 2. I expect to testify at trial regarding the matters discussed in this expert report, and
9 in any supplemental reports or declarations that I may prepare for this matter. I may also testify
10 at trial regarding matters related to my opinions addressed by any expert or fact witness testifying
11 on behalf of Plaintiffs or Defendants Central Intelligence Agency; David H. Petraeus, Director of
12 the Central Intelligence Agency; United States Department of Defense; Leon Panetta, Secretary
13 of Defense; United States Department of the Army; John McHugh, United States Secretary of the
14 Army; United States Department of Veterans Affairs; and Eric K. Shinseki, United States
15 Secretary of Veterans Affairs (collectively “Defendants”), including but not limited to any
16 reports, testimony, exhibits, references, or demonstratives presented by Defendants.

17 3. I reserve the right to supplement or amend this report if additional facts and
18 information that affect my opinions become available. It is my understanding that Plaintiffs have
19 retained other experts and that Defendants may serve expert reports concerning one or more of
20 the issues I address in this report. I reserve the right to testify concerning such other reports or
21 testimony, and to respond to any such report from Defendants’ expert(s) and to rebut at trial any
22 opinions expressed in such a report or in such testimony. I also understand that depositions of
23 additional fact witnesses may take place and that Defendants have just recently produced or will
24 be producing additional documents that are still undergoing review. Furthermore, it is my
25 understanding that Defendants have produced, and continue to produce, a substantial quantity of
26 documents and other information in formats that are inaccessible or exceedingly difficult to
27 access or evaluate properly, and that Plaintiffs’ counsel is continuing to attempt to convert such
28 information into a usable format. Should Plaintiffs’ counsel’s efforts be successful, and

1 information from these sources becomes available to me, I reserve the right to supplement this
2 report to incorporate that information.

3 4. The headings in this report have been added to create sections for ease of
4 organization. I do not intend these headings to be in any way restrictive of the information
5 contained in the respective sections.

6 **B. Compensation**

7 5. I am being compensated for my work on this matter at my customary rate of \$350
8 per hour, plus expenses. My compensation is not conditioned on my opinions, testimony at
9 deposition or trial, or the outcome of this matter.

10 **II. MY BACKGROUND AND QUALIFICATIONS**

11 6. I received my Bachelor of Arts degree in Chemistry and Biology from New York
12 University in 1973 and my Ph.D. in the field of Pharmacology from the Department of
13 Experimental Therapeutics, Roswell Park Memorial Institute, State University of New York at
14 Buffalo in 1977. From 1977 to 1981, I was a Post-Doctoral Fellow and Staff Associate in the
15 Institute of Cancer Research, College of Physicians and Surgeons of Columbia University.

16 7. In 1981 I became an assistant professor at the College of Medicine and Dentistry
17 of New Jersey-Rutgers Medical School¹ in the department of Environmental & Community
18 Medicine². In 1987 I became an associate professor and in 1993 a full professor. Since 1995 I
19 have been Chief of the Division of Toxicology. During my academic career I have mentored
20 more than thirty graduate students and post-doctoral fellows who have gone on to prestigious
21 positions in academia and industry.

22 8. In 1982 I became a member of the graduate faculty for the Joint Graduate Program
23 in Toxicology at Rutgers University. In 2003 I became Deputy Director of the Joint Graduate
24 Program in Toxicology between UMDNJ and Rutgers.

25 ¹ The institution's name has since changed to the University of Medicine and Dentistry of
26 New Jersey Robert Wood Johnson Medical School ("UMDNJ-Robert Wood Johnson Medical
School").

27 ² The department has since been renamed Environmental & Occupational Medicine.
28

1 9. I have been a member of the Environmental and Occupational Health Sciences
2 Institute (“EOHSI”) at UMDNJ and Rutgers since 1986 and was made the director of the Division
3 of Toxicology there in 2005.

4 10. I am the Center Director for the UMDNJ-Rutgers University CounterACT
5 Research Center of Excellence. The purpose of CounterACT is to develop new and improved
6 countermeasures against high priority chemical weapons threats, including sulfur mustard.

7 11. I am also a founding member of the University Center for Disaster Preparedness
8 and Emergency Response at UMDNJ.

9 12. I have served on the New Jersey Department of Homeland Security Preparedness
10 College as well as on the Advisory and Executive Committee of the New Jersey Universities
11 Homeland Security Research Consortium.

12 13. I am a member of the American Association for Cancer Research and the Society
13 of Toxicology.

14 14. Throughout my career my research has focused on environmental and chemical
15 toxicology. I have lectured and developed courses, as well as published extensively, on the
16 subject of toxicology.

17 15. Sulfur mustard, also called mustard gas, and closely related derivatives such as
18 half mustard, have been a significant focus of my research. I have both published widely and
19 been invited to give numerous presentations on the subject.

20 16. I have published more than 150 original research and review articles in peer
21 reviewed journals on a variety of subjects including chemical toxicology and the effects of
22 vesicants like sulfur mustard on various model systems. I have been invited to present my
23 research work at numerous professional meetings both in the United States and internationally. I
24 have also organized numerous meetings on topics related to my work, including the threat posed
25 by terrorists armed with chemical weapons like mustard gas. A current copy of my *curriculum*
26 *vitae* is attached hereto as Exhibit 1, which includes a complete list of my publications to date.

27 17. I have not testified as an expert witness or prepared an expert report in any matter
28 in the last four years.

1 **III. BASIS AND SCOPE OF MY OPINIONS**

2 18. I have been asked to provide an overview of the physiological effects on the
3 human body of various chemical compounds, broadly classified as irritants and vesicants, studied
4 in various testing programs conducted by Defendants. These compounds include various irritants
5 in addition to the vesicants sulfur mustard, nitrogen mustard and Lewisite. Moreover, I have been
6 asked to provide my opinion about the potential long-term health problems linked to exposure to
7 such agents. In addition, I have been asked to opine about whether service members exposed to
8 irritants or vesicants like mustard gas and/or Lewisite in the various chemical weapons testing
9 programs operated by Defendants during the last century can reasonably be expected to develop
10 adverse long-term health problems as a result. I may testify about any or all of these topics.

11 19. In arriving at my opinions, expressed in detail in this report, I have relied on my
12 personal experience as well as various additional resources. I have relied upon the types of
13 information and resources that are normally relied upon by experts in my field, such as articles in
14 peer reviewed journals, treatises and similar scholarly works, and published reports regarding the
15 testing programs at issue. In particular, I have reviewed several studies commissioned by the
16 Department of Veterans Affairs examining the long-term impact on the health of service members
17 experimentally exposed to various chemical agents including irritants or vesicants during their
18 service. Of particular note is the report titled *Veterans at Risk: The Health Effects of Mustard
19 Gas and Lewisite*,³ published in 1993, and compiled by the Institute of Medicine. I have also
20 reviewed relevant portions of Volumes 2 and 3 of the National Research Council’s report
21 *Possible Long-Term Health Effects of Short-Term Exposure to Chemical Agents*⁴ which focuses
22 primarily on the testing programs conducted at Edgewood Arsenal.

23 ³ *Veterans at Risk: The Health Effects of Mustard Gas and Lewisite*, C. Pechura and D.
24 Rall eds., National Academy Press (1993) (hereinafter “*Veterans at Risk*”).

25 ⁴ *Possible Long-Term Health Effects of Short-Term Exposure to Chemical Agents*, Vols. 2
26 and 3, National Academy Press (1984) (hereinafter “*NRC Report Vol. 2 or 3*”). I have reviewed
27 and relied on the NRC reports for their factual content and descriptions of the various chemical
28 weapons testing programs. My reliance on the factual information contained in those reports does
not mean that I agree with the ultimate conclusions reached. I understand that another expert for
Plaintiffs will be opining on the validity and design of the analysis presented in those reports, and
I express no opinion on that topic.

1 20. I have also reviewed documents from various other sources which contain
2 contemporaneous reports and accounts of actual tests involving irritants, mustard gas and
3 Lewisite. These documents were helpful to my understanding of the circumstances surrounding
4 the experiments performed in the various testing programs and example test protocols used.

5 21. These are some of the primary references I have reviewed and relied upon in
6 reaching my opinions; a complete list of documents I have consulted and considered is included
7 as Exhibit 2 to this report. Throughout my report I have cited specific documents, and portions of
8 those documents, to illustrate technical and historical points. These citations are only illustrative,
9 not exhaustive, and I may rely on other specific portions of these documents, as well as any of the
10 references listed in Exhibit 2 to support any of these points. Moreover, to the extent Defendants
11 provide an expert report responding to any of the points addressed in this report, I reserve the
12 right to consider, comment on, or rely on any documents referenced in any such report.

13 22. I reserve the right to provide further exhibits to be used as a summary of, or as
14 support for, my opinions or testimony, including any testimony by experts or other witnesses at
15 trial.

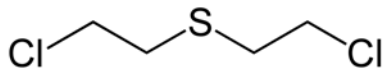
16 **IV. VESICANTS**

17 **A. Vesicants as Weapons of War.**

18 23. Sulfur mustard is likely the best known, and most widely studied, vesicant. It is
19 known by a variety of names, including Yperite, S-mustard, Lost, S-Lost, yellow cross, and H or
20 HD, though it is most commonly called mustard gas. (*Veterans at Risk* at 22; *Medical Aspects of*
21 *Chemical and Biological Warfare – Textbook of Military Medicine, Sidell, F., et al., Office of the*
22 *Surgeon General (1997) (hereinafter “Military Medicine”)* at VET004_001134, 1136-37.)
23 Though its toxic properties were known as early as the 1880s, sulfur mustard was first used as a
24 weapon of war in Belgium, near Ypres, in 1917, where its characteristic odor of mustard or garlic
25 led to its name. (*Veterans at Risk* at 21-22; *see also* Gordon, M. *et al., Chapter 39: Ocular*
26 *Toxicity of Sulfur Mustard, Handbook of Toxicology of Chemical Warfare Agents, Elsevier Inc.,*
27 *575-594 (2009) (hereinafter “Handbook of Toxicology Chapter 39”)* at 575-76; Gerecke, D. *et al.,*
28 *Chapter 41: Dermal Toxicity of Sulfur Mustard, Handbook of Toxicology of Chemical Warfare*

1 Agents, Elsevier Inc., 611-630 (2009) (hereinafter “*Handbook of Toxicology Chapter 41*”) at
2 611.) By the end of World War I, sulfur mustard was responsible for more than 400,000
3 casualties. (*Veterans at Risk* at 9.) Unfortunately, the use of sulfur mustard as a chemical
4 weapon did not end with the end of World War I. Over the ensuing decades, sulfur mustard has
5 been used throughout the world on numerous occasions, most recently in the 1980s by Iraq during
6 its war with Iran. (*Veterans at Risk* at 9-10.)

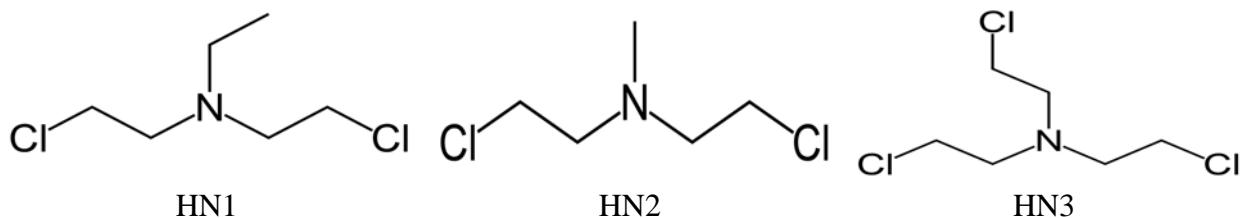
7 24. The chemical structure of sulfur mustard is shown below:



11 Though called a gas, sulfur mustard is typically liquid at room temperature. (*Veterans at Risk* at
12 22.) Exposure of the skin, eyes, respiratory tract or gastrointestinal tract to liquid, gaseous, or
13 aerosolized sulfur mustard can cause serious injury, particularly under hot, humid conditions.
(*Id.*)

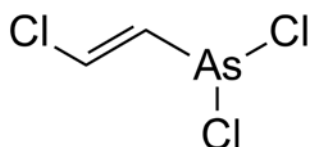
14 25. One of sulfur mustard’s most insidious characteristics is its persistence. At lower
15 temperatures liquid sulfur mustard can remain on contaminated surfaces, such as ground or
16 clothing, for long periods causing an ongoing exposure hazard. (*Id.*; *Military Medicine* at
17 VET004_001138; *NRC Report Vol. 2* at 104-105.) Similarly, sulfur mustard can persist for long
18 periods on the skin and clothing without causing immediate pain or injury; thus soldiers exposed
19 to sulfur mustard may not be aware of the exposure until hours later, when symptoms such as skin
20 reddening, or erythema, first appear. (*See Military Medicine* at VET004_001143, 1151). Despite
21 decades of research, there is still no known antidote for sulfur mustard exposure. (*Id.* at
22 VET004_001136; *Handbook of Toxicology Chapter 39* at 589-590.)

23 26. The nitrogen mustards, a family of chemically related compounds, were first
24 synthesized in the 1930s. (*Military Medicine* at VET004_001136.) The chemical structures of
25 the three nitrogen mustards, HN1, HN2 and HN3, are shown below:
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6 The nitrogen mustards are chemically and structurally similar to sulfur mustard, the primary
7 difference being the replacement of the central sulfur atom with nitrogen. The nitrogen mustards
8 have similar vesicant activity to sulfur mustard, though, based on animal testing, they appear to
9 have more pronounced systemic and central nervous system effects. (*Id.* at VET004_001137.)
10 The nitrogen mustards are not, however, suitable for military use, and have never been used on
11 the battlefield. (*Id.*) One of the nitrogen mustards, HN2, was developed as an effective
12 chemotherapy agent for the treatment of cancer, specifically certain neoplasms. (*Id.* at
13 VET004_001136; *Veterans at Risk* at 44-45.)

14 27. Lewisite is a member of a different class of vesicants called arsenicals, due to the
15 presence of arsenic in the chemical structure, as shown below:



19 Lewisite was developed in the United States towards the end of World War I, but never saw
20 battlefield use. (*Military Medicine* at VET004_001136, 1156.) Lewisite is more volatile than
21 sulfur mustard, and remains fluid at low temperatures, making it better adapted for use in colder
22 climates. (*Id.* at VET004_001156; *Veterans at Risk* at 25.) Its rapid hydrolysis, however, makes
23 it ill-suited for use in warm, humid conditions, where it can be difficult to maintain biologically
24 active concentrations of the vapor. (*Military Medicine* at VET004_001156)

25 **B. Physiological Effects of Mustard Gas and Lewisite.**

26 28. Mustard gas and Lewisite are broadly classified as vesicants based on their ability
27 to produce vesicles, or blisters, on exposed skin, though they can also cause severe damage to the
28 eyes and respiratory tract as well. (*Veterans at Risk* at 21-22.) At sufficiently high doses these

1 effects are lethal. (*Id.*) Moreover, mustard is rapidly absorbed and distributed throughout the
2 body, where it can damage all cell types and organs, including the bone marrow, leading to
3 immune suppression. (*Military Medicine* at 1170.) The effects of mustard gas are also
4 cumulative, meaning that even small doses can build up in the body and produce toxic effects.

5
6
7 **1. General Mechanisms of Action.**

8 29. The exact biochemical mechanism of action of sulfur and nitrogen mustards is not
9 well understood, but both are known to be potent alkylating agents. (*Military Medicine* at
10 VET004_001139-41; Shakarjian, M. *et al.*, “Mechanism mediating the vesicant actions of sulfur
11 mustard after cutaneous exposure,” *Tox. Sci.* 114(1) 5-19 (2010) (hereinafter “Shakarjian 2010”).)
12 As such, they can react with a range of macromolecules in the human body, including DNA,
13 RNA, proteins and cellular membrane components. (*Military Medicine* at VET004_001139-41;
14 Shakarjian 2010 at 9-13; *Handbook of Toxicology Chapter 41* at 612-613.) Mustard mediated
15 injury may be initiated by alkylation of DNA,⁵ interaction with other macromolecules, or some
16 combination of these processes. (*Military Medicine* at VET004_001139-41; *see also Veterans at*
17 *Risk* at 71-80; Shakarjian 2010 at 9-13; *Handbook of Toxicology Chapter 39* at 582-585;
18 *Handbook of Toxicology Chapter 41* at 612-616.) Regardless of the precise sequence of events,
19 injuries caused by mustard typically involve a disruption of the epidermal-dermal junction,
20 inflammation, and blister development. (*Military Medicine* at VET004_001139-41; *Veterans at*
21 *Risk* at 162-164; Shakarjian 2010 at 6, 8-14; *Handbook of Toxicology Chapter 41* at 613-616; *see*
22 *also Handbook of Toxicology Chapter 39* at 582-585 (explaining these effects in the eye).)

23 30. Like mustard, the exact biochemical pathway of Lewisite activity is not well
24 understood. (*Military Medicine* at VET004_001157.) As with other arsenicals, Lewisite can
25

26
27 ⁵ Alkylation is a type of chemical modification of DNA that typically leads to DNA
28 damage and genetic mutation. For example, chemotherapeutic agents used to fight cancer, such
as nitrogen mustard, routinely kill cancer cells by damaging their DNA through alkylation.

1 inhibit a variety of enzymes, which likely leads to its toxic properties, particularly inhibition of
2 carbohydrate metabolism. (*Id.*; see also *Veterans at Risk* at 71-80, 166-167.)

3 31. Most information on mechanisms of irritation and toxicity has been obtained using
4 mustard gas and the related vesicant half mustard (2-chloroethyl ethyl sulfide also referred to as
5 CEES). Aqueous physiological solutions of mustard gas are highly reactive, displaying a half-life
6 of only 24 minutes at room temperature, rates of hydrolysis increase with increasing temperature.
7 (Shakarjian 2010 at 9). Under these conditions, sulfur mustard forms a cyclic ethylene sulfonium
8 ion intermediate, a process that creates a reactive electrophile and the release of a hydrogen and
9 chloride ions. In tissues, this electrophile can react not only with nucleophilic sites in DNA, but
10 also RNA, proteins, carbohydrates and other biomolecules. Specific target molecules include
11 sulfhydryls, phosphates, ring nitrogens and carboxyl groups. Because sulfur mustard is
12 bifunctional, it can form a second electrophile, again via a sulfonium ion intermediate. This can
13 result not only in monofunctional adducts with biological molecules in cells and tissues, but also
14 bifunctional adducts. This bifunctional nature also means that sulfur mustard can form inter- as
15 well as intramolecular cross-links. (*Id.*)

16 32. In the case of DNA, mono- or bifunctional lesions generated by sulfur mustard can
17 initiate repair processes through DNA damage signaling cascades. These include homologous
18 recombination as well as nucleotide excision repair and non-homologous end joining. (Jowsey,
19 P.A., et al., "DNA damage responses in cells exposed to sulphur mustard," *Toxicol Lett.* 209:1-10
20 (2012).) Sulfur mustard-induced interstrand DNA cross links can also result in potentially toxic
21 DNA strand breaks. Critical for the repair of DNA strand breaks, including those induced by
22 sulfur mustard, is phosphorylation of the histone H2A variant, H2A.X. (Joseph, L.B., et al.,
23 "Structural changes in the skin of hairless mice following exposure to sulfur mustard correlate
24 with inflammation and DNA damage," *Exp Mol Pathol.* 91:515-527 (2011).) Phospho-H2A.X
25 recruits DNA damage response proteins important in DNA strand break repair. Each of the DNA
26 damage signaling cascades initiates processes that can promote survival of damaged cells and
27 contribute to alterations in epithelial cell growth and differentiation often associated with the
28

1 pathology found in both animal and human tissues following sulfur mustard exposures.

2 (Shakarjian 2010.)

3 33. An important factor associated with sulfur mustard-induced tissue damage that can
4 mediate irritation reactions as well as aberrant pathology is the production of cytokines, growth
5 factors, and lipid mediators. A number of animal studies have documented that sulfur mustard
6 increases expression of proinflammatory cytokines and growth factors in the skin. For example,
7 in rabbit skin, *in situ* hybridization studies have shown increases in interleukin-1beta, interleukin-
8 8, and monocyte chemoattractant-1. (Tsuruta, J., et al., "The cytokines NAP-1 (IL-8), MCP-1,
9 IL-1 beta, and GRO in rabbit inflammatory skin lesions produced by the chemical irritant sulfur
10 mustard," *Inflammation*. 20:293-318 (1996).) In mouse skin, sulfur mustard has been reported to
11 increase interleukin-1beta, interleukin-6, tumor necrosis factor-alpha and granulocyte monocyte-
12 colony stimulating factor. (Ricketts, K.M., et al., "Inflammatory cytokine response in sulfur
13 mustard-exposed mouse skin," *J Appl Toxicol*. 2000 Dec; 20 Suppl 1:S73-S6 (2000); Sabourin,
14 C.L., et al. "Alterations in inflammatory cytokine gene expression in sulfur mustard-exposed
15 mouse skin," *J Biochem Mol Toxicol*. 14:291-302 (2000).) Generally similar increases in
16 cytokines have been reported in the skin of weanling pigs, an animal model that closely resembles
17 human skin. (Sabourin, C.L., et al. "Cytokine, chemokine, and matrix metalloproteinase
18 response after sulfur mustard injury to weanling pig skin," *J Biochem Mol Toxicol*. 16:263-272
19 (2002).)

20 34. It is well recognized that eicosanoids, a class of lipid mediators that include
21 prostaglandins and leukotrienes, are critical for the development of inflammatory reactions.
22 Cyclooxygenase-2, the rate limiting enzyme in prostaglandin metabolism, has been reported to be
23 upregulated in mouse skin following sulfur mustard treatment. (Joseph, L.B., *Exp Mol Pathol*. at
24 91:515-527 (2011).) In a human skin construct model, CEES has also been shown to upregulate
25 cyclooxygenase-2 as well as several additional eicosanoid biosynthetic enzymes including 5-
26 lipoyxygenase, microsomal prostaglandin E₂ synthases, leukotriene A₄ hydrolase and leukotriene
27 C₄ synthase. (Black, A.T., et al., "Expression of proliferative and inflammatory markers in a full-
28 thickness human skin equivalent following exposure to the model sulfur mustard vesicant, 2-

1 chloroethyl ethyl sulfide,” *Toxicol Appl Pharmacol.* 249:178-187 (2010).) The importance of
2 prostaglandins in mediating inflammation in the skin following sulfur mustard treatment is
3 supported by work showing that sulfur mustard toxicity is blunted in cyclooxygenase-2 deficient
4 mice and that inhibition of the enzyme reduced sulfur mustard-induced inflammation and dermal
5 necrosis in the mouse ear vesicant model. (Wormser, U., et al., “Reduced sulfur mustard-induced
6 skin toxicity in cyclooxygenase-2 knockout and celecoxib-treated mice,” *Toxicol Appl*
7 *Pharmacol.* 200:40-47 (2004); Young, S.C., et al., “Investigation of anticholinergic and non-
8 steroidal anti-inflammatory prodrugs which reduce chemically induced skin inflammation,” *J*
9 *Appl Toxicol.* 32:135-41 (2012).)

10 35. The precise injury in tissues leading to basal cell damage and blistering is not well
11 understood. In the skin and cornea, sulfur mustard damages many layers of the tissue. In the
12 skin, damage can be found in the epidermis and dermis. However, it is generally thought that
13 blistering is the result of damage to the dermal-epidermal junction. In animal models, sulfur
14 mustard-induced damage to the basement membrane has been observed in skin as well as cornea.
15 (McNutt, P., et al., “Pathogenesis of acute and delayed corneal lesions after ocular exposure to
16 sulfur mustard vapor,” *Cornea.* 0:1-11 (2012); (Shakarjian 2010).) Despite the relatively non-
17 selective chemical reactivity of sulfur mustard, basal keratinocytes overlying the basement
18 membrane of the dermal-epidermal junction in the skin appear most sensitive and blistering
19 involves detachment of these cells from their basement membrane adherence zones. (Shakarjian
20 2010.) The mechanisms leading to detachment of these cells is multifactorial. Sulfur mustard
21 may directly modify basement membrane proteins and weaken basal cell attachments. For
22 example, sulfur mustard can modify intracellular actin microfilaments and keratin intermediate
23 filaments, both of which are known to be critical in maintaining epithelial connections with the
24 basal lamina. (Shakarjian 2010.) Direct modifications of these proteins *in vitro* have also been
25 demonstrated to block keratinocyte adherence to these matrix proteins, a response blocked by
26 sulfur mustard scavengers. (Zhang, Z., et al., “Assessment of sulfur mustard interaction with
27 basement membrane components,” *Cell Biol Toxicol.*, 11:89-101 (1995).) Alternatively, sulfur
28 mustard is known to stimulate target tissues to produce matrix metalloproteinases, a class of

1 enzymes released by keratinocytes that can directly target and degrade proteins in the basement
2 membrane. (Shakarjian, M.P., et al., "Preferential expression of matrix metalloproteinase-9 in
3 mouse skin after sulfur mustard exposure," *J Appl Toxicol.* 26:239-246 (2006).) In the above
4 studies, a mouse ear vesicant model was used to show that sulfur mustard markedly increases
5 matrix metalloproteinase-9, an enzyme that can degrade collagen IV and other components of the
6 basement membrane.

7 36. Another important consequence of sulfur mustard-induced DNA alkylation is the
8 activation of poly(ADP-ribose) polymerase (PARP), a family of nuclear signaling enzymes that
9 regulate poly-ADP ribosylation of DNA-binding proteins that are involved in repair processes.
10 Excessive activity of this enzyme in basal cells can deplete cells of NAD⁺ and adenosine
11 triphosphate resulting in cytotoxicity. This is thought to result in apoptosis or necrosis of basal
12 cells and contribute to the process by which these cells detach from the basement membrane to
13 cause blisters. (Kehe, K., et al., "Molecular toxicology of sulfur mustard-induced cutaneous
14 inflammation and blistering," *Toxicology* 26:12-19 (2009); Shakarjian 2010.)

15 37. As discussed in more detail below, these agents have various specific
16 physiological effects depending on the dose and exposed tissue. The most detailed information
17 has been reported in humans exposed to sulfur mustard. The skin, respiratory tract and eyes are
18 the most common sites of exposure to sulfur mustard.

19 2. Dermal Effects

20 38. One of the hallmarks of human exposure to sulfur mustard is irritation reactions.
21 In the skin, exposures can result in both acute and chronic reactions. Chronic effects have been
22 reported many decades following sulfur mustard exposures. Both acute and chronic effects are
23 dependent on dose and duration of exposure as well as environmental conditions. For instance,
24 higher temperatures and increased humidity exacerbate acute irritation reactions. Grossly, acute
25 irritation, which often arises within several hours of sulfur mustard exposure, includes pruritus, an
26 itching or burning sensation, pain, erythema, swelling, and vesicle and blister formation. (*See*
27 Poursaleh, Z., et al., "Pathogenesis and treatment of skin lesions caused by sulfur mustard,"
28 *Cutan Ocul Toxicol.* 1-9 (2011).) Soon after initial exposure, these reactions can lead to dermal

1 erosions and ulceration. Microscopically, this is associated with changes in growth and
2 differentiation of the epidermis, disruption of the basement membrane and white blood cell
3 infiltration with increased edema in the dermis. (Naraghi, Z.S., et al., “A clinicopathological
4 study on acute cutaneous lesions induced by sulfur mustard gas (Yperite),” *Eur J Dermatol.*
5 15:140-145(2005).)

6 39. Skin damage begins almost immediately after exposure to mustard, though
7 noticeable symptoms generally do not appear for 1-24 hours after exposure, typically appearing
8 more rapidly after exposure to liquid sulfur mustard, and may not be complete for several days.
9 (*Veterans at Risk* at 157-158; *Handbook of Toxicology Chapter 41* at 612-616.) The LD₅₀⁶ for
10 skin exposure with liquid sulfur mustard is about 700 mg/kg, which corresponds to exposure of
11 about 25% of the surface of the body, though a drop containing as little as 10 µg of sulfur mustard
12 can cause blistering. (*Military Medicine* at VET004_001139, 1170; *see also Veterans at Risk* at
13 157, Table 3-4.) Vapor exposure is typically reported as the concentration of the agent (mg/m³)
14 times the duration of exposure, or C_t. (*Military Medicine* at VET004_001139.) Thus, a longer
15 exposure to a low concentration of agent can be just as dangerous as a brief exposure to a very
16 high concentration. (*Id.*) The threshold vapor exposure for skin damage depends on various
17 factors including skin site, temperature, humidity, and sweat, though it generally falls in the range
18 of 50-2,000 mg•min/m³. (*Id.* at VET004_001139, 1143, 1170; *Veterans at Risk* at 158.)

19 40. Skin blisters caused by sulfur mustard are typically dome-shaped, thin walled and
20 surrounded by erythema. (*Military Medicine* at VET004_001144; *Handbook of Toxicology*
21 *Chapter 41* at 618-620.) Severe lesions are prone to necrosis and secondary infection. (*Military*
22 *Medicine* at VET004_001144.) Healing depends on the severity of the injury—erythema may
23 resolve in a matter of days while blisters may take weeks to months to fully heal. (*Military*
24 *Medicine* at VET004_001146-47.) In either case, exposure routinely leads to changes in skin
25 pigmentation. (*Id.*; *Veterans at Risk* at 159-162.) Irritation reactions can persist, with burning,
26 itching and psoriasis-like skin lesions reported many decades post sulfur mustard exposure,

27 ⁶ The LD₅₀ is the dose of a given compound that is lethal to 50% of the exposed
28 population.

1 including severe cases in which patients present with bullous lesions, lichen simplex, prurigo and
2 eczema. (Ghassemi-Broumand, M., et al., “Delayed Ocular, Pulmonary, and Cutaneous
3 Complications of Mustards in Patients in the City of Sardasht, Iran,” *Cutan Ocul Toxicol.*,
4 27:295-305 (2008) (hereinafter “Ghassemi-Broumand 2008”); Rowell, M., et al., “The chronic
5 effects of sulfur mustard exposure,” *Toxicology* 263:9-11 (2009); Namazi, S., et al., “Long-term
6 complications of sulphur mustard poisoning in intoxicated Iranian veterans,” *J Med Toxicol.*,
7 5:191-195 (2009) (hereinafter “Namazi 2009”).)

8 41. Unlike mustard gas, skin exposure to Lewisite is almost immediately painful.
9 (*Military Medicine* at VET004_001156-57; *Veterans at Risk* at 25.) Drops containing as little as
10 14 µg of Lewisite can cause vesication, while the LD₅₀ for skin exposure is about 30 mg/kg. (*Id.*
11 at VET004_001157; *Veterans at Risk* at 164-166.) Erythema appears within minutes of exposure,
12 with blisters developing within a few hours. (*Military Medicine* at VET004_001157; *Veterans at*
13 *Risk* at 166.) The resulting lesions are typically less severe than with mustard exposure, heal
14 more rapidly, are less prone to secondary infection, and produce changes in skin pigmentation
15 less often. (*Military Medicine* at VET004_001157.)

16 3. Pulmonary Effects

17 42. Acute inhalation exposure to sulfur mustard can cause irritation of the respiratory
18 tract, a result of non-specific inflammation of the mucosa and submucosa, which can develop into
19 a condition closely resembling acute respiratory distress syndrome. (Sohrapour, H., “First World
20 Congress on Biological and Chemical Warfare Agents, Belgium,” 291-297 (1989); Kehe, K., et
21 al., “Acute effects of sulfur mustard injury- Munich experiences,” *Toxicology* 263:3-8 (2009).)
22 Chronic lung irritation, which has been observed many decades following sulfur mustard
23 exposure, can result in changes that compromise lung function including losses of vital capacity
24 and forced expiratory volume and chronic obstructive pulmonary disease. These signs are often
25 associated with respiratory distress and abnormal lung auscultation. (Bijani, K. and
26 Moghadamnia, A.A., “Long term effects of chemical weapons on respiratory tract in Iraq-Iran
27 war victims living in Babol (North of Iran),” *Exotoxicology & Environmental Safety* 53:422-424
28 (2002); Namazi 2009; *see also* Brown, E. “Pulmonary Effects Following Chronic Exposure to HS

1 Vapor,” at VET123-008141-47 (report noting pulmonary disabilities reported by munitions
2 factory workers chronically exposed to mustard gas during the 1940s.)

3 43. Mustard-mediated lung damage is dose dependent, beginning with the upper
4 airways and descending into the lower airways as the dose of mustard increases. (*Military*
5 *Medicine* at VET004_001148; Weinberger, B. *et al.*, “Sulfur mustard-induced pulmonary injury:
6 therapeutic approaches to mitigating toxicity,” *Pulmonary Pharm. & Therapeutics* 24:92-99
7 (2011) (hereinafter “Weinberger 2011”) at 92-93.) The C_t for airway injury with gaseous sulfur
8 mustard is 100-500 mg•min/m³. (*Military Medicine* at VET004_001139, 1170; *see also Veterans*
9 *at Risk* at Tables 3-4 and 7-1.) Lung tissue is particularly susceptible to toxins compared to other
10 types of tissue, making inhalation an especially damaging form of exposure. The inflammation
11 associated with mustard gas exposure can vary from mild to severe, with necrosis of the airway
12 epithelium common in more serious cases. (*Military Medicine* at VET004_001148; *Veterans at*
13 *Risk* at 113-118; Weinberger 2011 at 93-95.) Airway injury typically takes several days to fully
14 develop, and in extreme cases can lead to acute inflammation of the upper and lower airways,
15 discharge, inflammatory exudate, pseudomembrane formation, tissue necrosis, and airway
16 obstruction due to sloughing of damaged tissue. (*Military Medicine* at VET004_001148-149;
17 *Veterans at Risk*; 113-118.) Symptoms of mustard gas exposure include coughing, hoarseness,
18 airway inflammation, and toneless voice. (*Military Medicine* at VET004_001148; *Veterans at*
19 *Risk*; 113-118.) Of those casualties who die from mustard exposure, the majority are due to
20 massive pulmonary damage from inhaling gaseous mustard, often complicated by infection and
21 sepsis. (*Military Medicine* at VET004_001150.)

22 44. Lewisite produces effects similar to mustard gas, and has an LD₅₀ by inhalation of
23 about 1,500 mg•min/m³ with airway damage occurring at a C_t of about 500 mg•min/m³. (*Military*
24 *Medicine* at VET004_001157.) Lewisite vapor causes immediate irritation of the respiratory
25 tract, which typically causes those exposed to seek immediate protection and treatment, thus
26 limiting their exposure and the extent of their injuries. (*Id.* at VET004_001158; *Veterans at Risk*
27 at 117-118.)

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4. Ocular Effects

45. While the eye is the organ most sensitive to sulfur mustard, as with skin exposure, there can be a prolonged latency period after exposure before symptoms appear. (*Military Medicine* at VET004_001147; *Handbook of Toxicology Chapter 39* at 575.) The time before symptoms appear varies by both individual sensitivity and the concentration of sulfur mustard, though the latency period is generally shorter than it is for skin exposure. (*Military Medicine* at VET004_001147; *Handbook of Toxicology Chapter 39* at 576 (noting a typical latency of 6-8 hours).)

46. Acute irritation reactions of the eye following sulfur mustard exposure include tearing, conjunctivitis, pain and grittiness under the eyelid, blepharospasm and corneal edema. Corneal damage and ulceration have also been reported. (Kehe, K., and Szinicz, L., "Medical aspects of sulphur poisoning," *Toxicology* 214:198-209 (2005).) Chronic ophthalmic complications reported many decades following sulfur mustard exposure include photophobia, foreign body sensation, burning, itching, lacrimation, redness, blurred vision, pain, and difficulty while reading; hyperemia, conjunctival edema, sub-conjunctival hemorrhage, conjunctival vascular dilation, conjunctival concretion, and altered visual acuity have also been reported as well as alterations in corneal structure and functioning, edema and neovascularization. (Pleyer, U., et al., "Delayed mustard gas keratopathy: clinical findings and confocal microscopy," *Am J Ophthalmol.* 128: 506-507 (1999); Ghassemi-Broumand 2008; Namazi 2009.)

47. The C_t for eye injury with gaseous sulfur mustard is 10-70 mg•min/m³. (*Military Medicine* at VET004_001139, 1170; *Handbook of Toxicology Chapter 39* at 579-580; see also *Veterans at Risk* at Tables 3-4 and 8-1.) Mild irritation generally appears after a low C_t exposure. (*Military Medicine* at VET004_001139; *Handbook of Toxicology Chapter 39* at 575-580.) As the C_t increases subjects experience progressively worsening conjunctivitis, blepharospasm, pain, and corneal damage. (*Military Medicine* at VET004_001139; *Handbook of Toxicology Chapter 39* at 575-580.) Subjects also typically experience persistent photophobia that can last for weeks, even with mild exposures. (*Military Medicine* at VET004_001139; *Handbook of Toxicology Chapter 39* at 575-580; see also *Veterans at Risk* at 133-139.)

1 48. Liquid mustard exposure causes even more severe eye injuries. Symptoms can
2 appear within minutes of a droplet of mustard entering the eye. (*Military Medicine* at
3 VET004_001148.) In extreme cases liquid mustard contamination of the eye can lead to
4 perforation of the cornea, loss of vision, and even loss of the eye. (*Id.*)

5 49. Laboratory studies with rabbits have shown that liquid mustard is rapidly absorbed
6 and dispersed into the eye, a process taking approximately five minutes. (*Military Medicine* at
7 VET004_001148.) Prompt decontamination of the eyes after exposure to liquid mustard is thus
8 vital to avoid serious local or systemic injury.

9 50. Lewisite is somewhat less toxic to the eye than mustard gas, producing damage at
10 a C_t of about 150 mg•min/m³. (*Military Medicine* at VET004_001157.) Moreover, eye injuries
11 from Lewisite tend to be less severe than those caused by sulfur mustard, because the immediate
12 pain and irritation caused by even small exposures to Lewisite triggers rapid blepharospasm,
13 preventing further contamination. (*Id.* at VET004_001158.)

14 5. Systemic Effects

15 51. Both sulfur and nitrogen mustards are known cellular poisons with mutagenic
16 effects making them recognized human carcinogens. (*Veterans at Risk* at 4, 22, 71-80.) Due to
17 its limited study in humans, the carcinogenic and mutagenic effects of Lewisite are not known,
18 though it has been found to produce chromosomal abnormalities in mammalian cells, which
19 suggests that similar effects may occur in humans. (*Military Medicine* at VET004_001159;
20 *Veterans at Risk* at 25.)

21 52. As a potent alkylating agent, DNA is one of mustard's most sensitive targets.
22 (*Military Medicine* at VET004_001177, 1180; *Veterans at Risk* at 82-85; *NRC Report Vol. 2* at
23 105-106.) Animal testing has shown that pulmonary and dermal, as well as subcutaneous,
24 exposure to sulfur mustard can cause localized cancers, though typically not systemic ones.
25 (*Military Medicine* at VET004_001177-78.) Studies of human exposures, including on the
26 battlefield, chronic exposures in munitions factories, and accidental exposures, indicate that sulfur
27 mustard is a human carcinogen. (*Id.* at VET004_001178.) In studies of chronic exposure of
28 factory workers, a definite link was found between increased incidences of respiratory tract

1 cancers and prolonged exposure to mustard gas. (*Id.*; see also *Veterans at Risk* at 87-103; *NRC*
2 *Report Vol. 2* at 107-111; see also Doi, M. *et al.*, “Effect of mustard gas exposure on incidence of
3 lung cancer: a longitudinal study,” *Am J Epidemiol.* 173:659-666 (2011).)

4 53. Sulfur mustard has also been found to be teratogenic and gonadotoxic, meaning
5 that it attacks the reproductive organs leading to infertility. (See Amirzargar, M.A. *et al.*,
6 “Chronic mustard toxicity on the testis: a historical cohort study two decades after exposure,” *Int*
7 *J Androl* 32:411-416 (2009) (hereinafter “Amirzargar 2009”).) Researches found a significant
8 decrease in fertility among men exposed to sulfur mustard during the Iran-Iraq war, though the
9 authors were unable to correlate the incidence of infertility with the extent of mustard exposure.
10 (*Id.* at 413-415.) Moreover, there have been reports of an adverse impact on the health of
11 children born to parents exposed to mustard gas, indicating some as yet poorly understood
12 heritable impact from mustard gas. (See Abolghasemi, H. *et al.*, “Childhood physical
13 abnormalities following paternal exposure to sulfur mustard gas in Iran: a case control study,”
14 *Conflict and Health* 4:13 (2010).)

15 C. U.S. Testing of Mustard Gas and Lewisite.

16 54. The use of sulfur mustard and other chemical weapons during World War I left a
17 lasting impression on military planners. Even before the Japanese attack on Pearl Harbor in 1941,
18 the United States had begun clandestine experiments with mustard gas. (See *Veterans at Risk* at
19 *v*, 10.) This research was conducted by two primary groups, the Committee on Medical Research,
20 which focused on treatments and protective ointments through the National Research Council’s
21 Committee on the Treatment of Gas Casualties, and the National Defense Research Committee,
22 which studied protective clothing, such as uniforms and gas masks, through military units such as
23 the Chemical Warfare Service. (*Id.* at *v*, 29-48.)

24 1. Pre-1950 Testing.

25 55. In response to the extensive, and devastating, use of chemical weapons during
26 World War I, the U.S. began developing its own chemical weapons capability. (See *Health*
27 *Effects from Chemical, Biological and Radiological Weapons*, Department of Veterans Affairs
28 (2003) (hereinafter “*Health Effects*”) at 3.) By 1942 the U.S. military had determined that animal

1 testing was insufficient to evaluate the effects of such weapons, and embarked on a program of
2 human experimentation with, among other chemical agents, sulfur mustard and Lewisite. (*Health*
3 *Effects* at 3; *NRC Report Vol. 2* at 254-257.) The program focused both on improving the U.S.
4 chemical weapons arsenal and the means to protect service members from such weapons. (*Health*
5 *Effects* at 3.) When World War II finally ended, upwards of 60,000 U.S. service members had
6 participated as human test subjects in these mostly secret experiments. (*Id.*; *Veterans at Risk* at
7 v.) Of these, at least 4,000 were exposed to high concentrations of mustard gas or Lewisite in
8 chamber or field tests. (*Health Effects* at 3; *Veterans at Risk* at 1.)

9 56. Exposure protocols in the program varied widely, but fell into three general
10 categories:

- 11 • **Drop or patch tests** – drops of mustard or Lewisite were placed on the skin or
12 clothing to test protective equipment, antidotes, treatments for burns,
13 sensitization, and the effects of physical exertion on the extent and severity of
14 reactions to mustard or Lewisite exposure.⁷
- 15 • **Chamber tests** – subjects were placed in gas chambers, with or without
16 protective equipment, and exposed to gaseous mustard or Lewisite. Subjects
17 were typically exposed multiple times until they developed erythema.
- 18 • **Field tests** – subjects were sent into contaminated areas, typically to test the
19 effectiveness of protective equipment, though some tests involved unprotected
20 subjects, and to evaluate the persistence and extent of contamination.

21 (*Health Effects* at 3-4; *Veterans at Risk* at 31-41.)

22 **a. Drop or Patch Tests**

23 57. There appears to have been little or no standardization in the drop and patch type
24 tests.

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27 ⁷ Mustard drop tests were also a common element of basic training to impress on recruits
28 the dangers of chemical weapons and the need for prompt response if such weapons were used.
(*Health Effects* at 3-4; *Veterans at Risk* at 31-41.)

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Moreover, the tests often involved different protective ointments or treatments. (*Veterans at Risk* at 35.) Given this high degree of variability in the tests, it is difficult to determine the cumulative dose subjects experienced, although it appears to have always been sufficient to cause a visible response—at minimum erythema but more likely a blister. (*Id.*) Moreover, given that mustard is rapidly absorbed into the system, and accumulates over time, even relatively small drops could present an appreciable systemic exposure.

b. Chamber Tests

58. The chamber tests were similarly poorly controlled. (*Veterans at Risk* at 36.)

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They were then examined 24 hours later for signs of erythema, an indication of failure of the protective equipment. (*Veterans at Risk* at 36.) This process was repeated either daily or every second day until the subject developed moderate to intense erythema. (*Id.* at 36-37.) These were called “man-break” tests since the endpoint was the subject showing signs of injury from the vesicant being tested. (*Id.*)

59. Using the development of erythema as an endpoint would, in my opinion, have led to substantial exposure. The development of erythema during these tests was an indication that the protective equipment had failed. However, given the lag between exposure and the development of erythema, many of the subjects who eventually did develop erythema were likely exposed to mustard gas for a prolonged period, since they would have remained in the chamber until the end of an exposure period, unaware that their equipment had already failed and they were effectively unprotected. Moreover, some chamber test subjects, given incomplete or inadequate protective equipment to begin with, experienced dangerously high exposures, and developed severe burns and crusted lesions, particularly to the genitals, that took up to a month to heal. (*Health Effects* at 4; *Veterans at Risk* at 39.)

60. It is difficult to determine with any degree of accuracy the dose of mustard subjects in these chamber tests actually received.⁸ At minimum, they received a sufficient cumulative dose to suffer skin damage, since development of erythema was the endpoint of the tests. (*Veterans at Risk* at 52.) This means they received a minimum of 100-300 mg•min/m³ of mustard, while some likely received much higher doses, in the 1,000-2,000 mg•min/m³ range.

⁸ It is my understanding, based on conversations with Plaintiffs’ counsel, that Defendants have compiled a “Mustard Gas Database.” While that database includes some information about exposures, it includes little or no dose information. I have not seen any other records that provide useful information about the actual doses received by test subjects. I therefore have relied on secondary indications of dose, such as physical manifestations of exposure.

1 (*Id.*) Given the hot, humid conditions of the chamber tests, the effective doses were likely
2 significantly higher, since mustard tends to preferentially attack moist skin. (*Id.*)

3 61. Beyond the direct exposure during the test itself, the requirement that subjects
4 remain in their “equipment,” unmasked, for 4-24 hours after exiting the chamber likely exposed
5 them to additional mustard from their contaminated clothing. (*Id.*) Finally, the repetition of such
6 tests, every day or two, further compounded the exposure due to accumulation of the mustard
7 dose.

8 62. In addition to skin exposure, *Veterans at Risk* describes the likely leakage of
9 mustard through the gas masks used in the tests, indicating that subjects may have received
10 substantial additional exposure to the eyes and respiratory tract even through properly functioning
11 masks. (*Id.* at 53-54.) I have reviewed the calculations reported in *Veterans at Risk* and find
12 them reasonable, though I have not independently verified them.

13 63. Taken together, these facts indicate that the subjects used in chamber tests likely
14 received substantial cumulative doses of mustard. (*Id.* at 55.)

15 **c. Field Tests**

16 64. Apparently little is known about the protocols for field tests, although the available
17 evidence indicates that over the years of the testing programs more than 1000 service members
18 were involved. (*Veterans at Risk* at 40.)

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27 65. Given the uncertainty in testing conditions (particularly temperature and
28 humidity), and levels and efficacy of protective equipment used, it is difficult to determine the

1 likely level of exposure suffered by these subjects.
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10 66. Based on the discussion in *Veterans at Risk* and other references I have reviewed,
11 it appears that a very large number of service members experienced significant exposures to
12 sulfur mustard and Lewisite in the pre-1950 military chemical weapons testing programs. These
13 test subjects likely suffered significant acute injuries and, as discussed below, are, in my opinion,
14 at an increased risk of developing a range of disorders traceable to their exposure to mustard gas.

15 **2. Post-1950 Testing and the Edgewood Arsenal Program.**

16 67. The vesicant testing program continued at Edgewood Arsenal after World War II,
17 but the scope of the program was far more limited. Records indicate that at least 147 individuals
18 were exposed to sulfur mustard at Edgewood Arsenal. (*NRC Report Vol. 2* at 124; *Veterans at*
19 *Risk* at 46-47.) The bulk of the subjects were involved in chamber tests. (*NRC Report Vol. 2* at
20 124.) As with much of the World War II era testing, chamber tests at Edgewood were designed
21 to test protective clothing and masks. (*NRC Report Vol. 2* a 124; *see also* DTIC Report 462053
22 “Protection Afforded By Experimental XXCC3-Impregnated Navy Work/Combat Clothing Worn
23 By Men Exposed to Mustard Vapor” at 3, 7-16; “Agent List 1955-1975 Edgewood”
24 VET102_000129 at 219-221.) And, as with the World War II era tests, subjects received
25 repeated exposures until the test equipment failed and they developed erythema, in some cases as
26 many as fourteen sequential exposures. (*NRC Report Vol. 2* at 124-127; DTIC Report 462053 at
27 15.) While in some instances information about the target concentration of mustard in the
28 chamber is available, since the tests involved testing protective equipment to the point of failure

1 using development of erythema as a guide, it is difficult to know what total dose these subjects
2 actually experienced. (*Id.* at 124-127.) Given that the protocols seem similar to those described
3 in *Veterans at Risk* for the World War II era testing, I believe it is reasonable to assume that
4 subjects in the Edgewood gas chamber experiments received total doses of mustard gas in the
5 same range estimated for the subjects involved in the World War II era experiments—namely
6 significant mustard exposures.

7 68. Approximately thirty subjects at Edgewood were also used in sulfur mustard drop
8 tests to test protective ointments and treatments. (*NRC Report Vol. 2* at 124-126.) These subjects
9 sometimes developed erythema and blistering at the site of application. (*Id.*) As noted above, the
10 rapid absorption of mustard through the skin means that these drop tests also likely gave these test
11 subjects a substantial systemic exposure to sulfur mustard. Again, exactly how large of a dose is
12 difficult to know without more precise information about the size of drop used, the concentration
13 of sulfur mustard in the drop, ambient conditions (including temperature and humidity), the
14 solvent, and the condition of the subject's skin, particularly whether they were sweating.

15 69. There were, apparently, no reports of respiratory or ocular injuries in the 147 men
16 exposed to sulfur mustard during the Edgewood testing. (*NRC Report Vol. 2* at 127.) It is,
17 however, likely that they did experience some level of mustard exposure to the eyes and
18 respiratory system, given that, as noted in *Veterans at Risk*, gas masks are imperfect and will
19 typically allow some level of leakage. Moreover, subjects required to continue wearing
20 contaminated clothing *without* a mask would almost assuredly suffer some mustard exposure to
21 their eyes and respiratory system.

22 **V. IRRITANTS**

23 70. In addition to the large-scale testing of vesicants discussed above, particularly
24 sulfur mustard, Defendants tested a wide range of irritants. (*See NRC Report Vol. 2* at 101-103,
25 135-184, 203-210, 231-253.)

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28 Human and animal testing has shown that each of these agents causes acute toxicity

1 and, in some cases, persistent toxicity has been noted. The possibility of long-term health effects
2 caused by a particular agent are dependent on a variety of factors including the acute dose,
3 duration of exposure, ambient environmental conditions (temperature, humidity, etc.),
4 sensitization from prior exposure and inter-individual variability. (See, e.g., *NRC Report Vol. 2* at
5 101-103, 135-184, 203-210, 231-253.) Unfortunately, the major irritants tested at Edgewood,
6 Adamsite, CN, CS and EA 1778, have not been well studied; there is a lack of clinical data,
7 particularly longitudinal studies of subjects exposed to these compounds. In the case of
8 individuals responding to acute chemical irritant exposure, however, persistent adverse health
9 effects including irritant-induced asthma continue to be noted. (Brooks, S.M., et al., "Reactive
10 airways dysfunction syndrome. Case reports of persistent airways hyperreactivity following high-
11 level irritant exposures" *J Occup Med.* 27(7):473-476. (1985).)

12 **A. Adamsite**

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21 Tightness of the chest has been reported. According to the NAS report on Possible Long-Term
22 Health Effects of Short-Term Exposure to Chemicals in studies at Edgewood, "predominant
23 symptoms were related to respiratory tract irritation: burning sensations of the respiratory
24 passages, choking sensations, dysphonia, dyspnea, coughing, and sneezing. Nausea was common.
25 Other, less frequent effects were retching, anorexia, headache, dizziness, lacrimation, salivation,
26 and urinary frequency." (*NRC Report Vol. 2* at 209.)

27 72. According to the CDC/NIOSH, "Exposure to higher concentrations of Adamsite
28 (DM) can result in more severe, longer-lasting redness, itching, and swelling possibly followed

1 by blister (vesicle) formation” and in the eye, exposures can lead to necrosis of the corneal
2 epithelium. (CDC, NIOSH, The Emergency Response Safety and Health Database: Vomiting
3 Agent: Adamsite, http://www.cdc.gov/niosh/ershdb/EmergencyResponseCard_29750017.html.)
4 Such injuries can have long-term health consequences.

5 73. Sittig's Handbook of Toxic and Hazardous Chemicals and Carcinogens states that,
6 “No assessment has been made of possible long-term effects of short-term exposures to
7 Adamsite.” However, medical surveillance including pulmonary function tests and radiographic
8 imaging is suggested especially in those who have persistent symptoms of dyspnea, cough or
9 chest discomfort. This emphasizes the possibility that exposure to respiratory irritants,
10 particularly repeated or high dose exposures, can lead to long term respiratory effects.

11 **B. CN**

12 74. CN is known by a number of names, including mace, phenacyl chloride,
13 chloroacetophenone, and phenyl chloromethyl ketone.

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17 According to the CDC,
18 NIOSH, exposure to CN in the eyes can cause “inflammation of the cornea (keratitis),
19 inflammation of the conjunctiva (conjunctivitis), chemical burns, loss of the outer layer of the
20 cornea (corneal epithelium), sensitivity to light (photophobia), and blurred vision. Partial eye
21 opacity is possible and may be permanent.” (CDC, NIOSH, CHLOROACETOPHENONE (CN):
22 Riot Control/Tear Agent, [http://www.cdc.gov/NIOSH/ershdb/EmergencyResponse](http://www.cdc.gov/NIOSH/ershdb/EmergencyResponseCard_29750033.html)
23 [Card_29750033.html](http://www.cdc.gov/NIOSH/ershdb/EmergencyResponseCard_29750033.html).) In the skin, mild to moderate responses include irritation and pain while
24 severe responses can cause erythema, blistering, and denuded areas. In the lung, severe responses
25 can cause pulmonary edema, bronchospasm and bronchopneumia. Severe reactions to CN as
26 described may have long term adverse health consequences. According to the CDC, “severe
27 exposures, such as those in enclosed spaces, may cause permanent damage to the eyes, including
28 blindness.” (*Id.*)

1 75. According to the *Report Volume 2*, “CN, a moderately toxic irritant, has immediate
2 effects on the eyes, skin, and respiratory tract. CN is a strong skin-sensitizing agent, but is rarely
3 lethal. The Committee found no evidence of lasting ocular or respiratory effects in 99 volunteers
4 exposed experimentally at Edgewood between 1958 and 1972 when subjects were evaluated
5 2 wk. after cutaneous administration or inhalation of aerosol. Allergic contact dermatitis or
6 hypersensitivity in these volunteers on re-exposure to CN is possible. There has been no
7 systematic study of the possible mutagenic and neoplasm-promoting effects of CN with current
8 scientific methods.” (*NRC Report Vol. 2* at xv.) Echoing the concern about the lack of
9 information about potential long-term consequences of exposure to such compounds, Olajob and
10 Salem have noted that “As with other xenobiotics, not enough is known concerning the long-
11 term/chronic effects of riot control agents.” (Olajos, E.J. and Salem, H., “Riot control agents:
12 pharmacology, toxicology, biochemistry and chemistry,” *J Appl Toxicol.* 21(5):355-391 at 355
13 (2001).)

14 **C. EA 1778**

15 76. An irritant developed at Edgewood Arsenal, EA 1778 is also known as nonanoyl
16 morpholide and pelargonic morpholide. EA 1778 is a lacrimator that causes coughing, a burning
17 sensation of the nose, throat, and eyes, and in some cases nausea. (*NRC Report Vol. 2* at 231-
18 234.) It has also been reported to cause respiratory tract irritation including rhinorrhea, substernal
19 pain, and dyspnea. (*Id.*)

20 77. In its report, the NAS stated that EA 1778 appeared to be less toxic than other
21 irritants tested, and did not expect long term health effects from the dosages used at Edgewood.
22 (*Id.* at 233, 253 (“The Committee does not expect long-term health effects in subjects tested with
23 nonanoyl morpholide at the dosages used at Edgewood.”).) They noted, however, that as with the
24 other irritants tested, there was no specific toxicological information available regarding the
25 potential for long-term health effects. (*Id.* at 233, 235 (“As with CA, DM and CHT, specific
26 toxicologic data regarding its potential in this regard are not available.”)

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1 **D. CS**

2 78. By far the irritant most widely tested Edgewood was CS, also called o-
3 chlorobenzylidene malononitrile or tear gas. Service members were subjected to full body
4 exposures in wind tunnel tests, to more limited exposures in mask and smaller wind tunnel tests,
5 to ocular exposures, and skin tests. (*See NRC Report Vol. 2* at 135-166; *see, e.g.*, Edgewood
6 Arsenal Technical Report EATR 4246 The Effects of the Riot Control Agent CS on Visual
7 Acuity; Edgewood Arsenal Technical Report EATR 4252 An Evaluation of the Irritant Potential
8 of CS Aerosols on Human Skin Under Tropical Climatic Conditions; Edgewood Arsenal
9 Technical Report EATR 4301 Toxicity of o-Chlorobenzylidene Malonitrile (CS) in
10 Trioctylphosphate (TOF) Solutions; Edgewood Arsenal Technical Report EATR 4309
11 Toxicology of Riot Control Agents—CS, CN, and DM at 14-25; Edgewood Arsenal Technical
12 Report EATR 4377 CS in Water: Effects on Human Eyes.) CS vapors are extremely irritating to
13 the eyes and respiratory tract. According to the *NRC Report*, the immediate effects of CS
14 “include a burning, pricking, or peppery sensation in the eyes, nose, mouth, throat, and skin;
15 lacrimation, rhinorrhea, and salivation; blepharospasm and injection of the conjunctivas and
16 margins of the eyelids; photophobia lasting up to 1 h in 10% of subjects; tightness of the chest
17 associated with gripping pain, breathholding, dyspnea, coughing, and sneezing; erythema and
18 occasionally vesiculation of exposed skin; and nausea, vomiting, headache, and apprehension.”
19 (*NRC Report Vol. 2* at 148.)

20 79. As with the other irritants discussed above, studies of long-term effects of CS are
21 lacking. According to Blain (2003) “[t]here is no evidence that a healthy individual will
22 experience long-term health effects from open-air exposures to CS or CR.” (Blain, P.G. “Tear
23 gases and irritant incapacitants. 1-chloroacetophenone, 2-chlorobenzylidene malononitrile and
24 dibenz[b,f]-1,4-oxazepine,” *Toxicol Rev.* 22(2):103-110 at 104 (2003).) According to the *NRC*
25 *Report*, “[t]here are no data to suggest that the low dose CS-exposure of 105 subjects at
26 Edgewood would give rise to long-term health effects in the primary target organs, the eyes and
27 respiratory tract” and “[t]here is virtually no evidence that CS poses a mutagenic or carcinogenic
28 hazard.” (*NRC Report Vol. 2* at 165-66.) The *NRC Report* also notes that “[r]esults of

1 experimental studies in microorganisms and short-term experiments in laboratory animals suggest
2 that long-term medical abnormalities in soldiers exposed to CS are unlikely. Acute tissue
3 changes produced in animals and humans seem reversible and not likely to become chronic in the
4 absence of recurrent exposures.” (*Id.* xiv.) However, “[f]ollow-up information on the long-term
5 state of health of exposed soldiers is not available, but no reports indicate that Edgewood subjects
6 have experienced any long-term sequelae.” (*Id.*)

7 **VI. LONG-TERM HEALTH EFFECTS**

8 **A. Vesicants.**

9 80. As early as the 1930s it was known that exposure to mustard gas could produce
10 long-term health effects. (*See Veterans at Risk* at 28-29.) The U.S. military, however, apparently
11 failed to include this research in at least its 1941 training manual on how to treat victims of
12 chemical weapon attacks, and chose not to follow the long-term health of the service members
13 used in its chemical weapons testing programs. (*Id.*)

14 81. As noted above, I have reviewed a variety of sources that have examined the likely
15 long-term health effects from exposure to mustard and Lewisite. These include summaries of
16 studies of humans exposed to mustard under battlefield conditions, particularly during World War
17 I and the Iran-Iraq war, chronic occupational exposures of workers in munitions factories, and
18 clinical exposures, as well as studies in animal models. Of particular importance in my review
19 was the discussion in *Veterans at Risk* as well as more recent scientific reports of the health and
20 welfare of Iranians exposed to mustard during the Iran-Iraq war.

21 82. It is my understanding that the *Veterans at Risk* report was commissioned by the
22 Department of Veterans Affairs (“VA”) in response to the disclosure that tens of thousands of
23 service members had been used as human test subjects in experiments with mustard gas and
24 Lewisite, a rise in veterans presenting with health problems likely linked to these exposures, and
25 growing public pressure to determine the possible long-term health effects these victims might be
26 suffering as a result of their participation in the various testing programs. (*See Veterans at Risk* at
27 v-vi, 1-2, 11.) As described in *Veterans at Risk*, the men and women who conducted that
28 investigation reviewed thousands of pages of documents describing the testing programs as well

1 as first-hand accounts, where possible, consulted the scientific literature about mustard gas and
2 Lewisite, and examined medical records from victims of the various branches of this testing
3 program. (*Id.* at vi, 2-3, 11-12.)

4 83. Based on their extensive investigation, the authors of *Veterans At Risk* found a
5 causal relationship between exposure to mustard gas or Lewisite and the following conditions:

- 6 • Respiratory cancers
 - 7 ○ Nasopharyngeal
 - 8 ○ Laryngeal
 - 9 ○ Lung
- 10 • Skin cancer
- 11 • Leukemia (typically acute nonlymphocytic type, associated with nitrogen
12 mustard exposure)
- 13 • Skin pigmentation disorders
- 14 • Chronic skin ulceration and scar formation, including related sexual dysfunction
15 due to scrotal or penile scarring
- 16 • Chronic respiratory disorders
 - 17 ○ Chronic bronchitis
 - 18 ○ Chronic laryngitis
 - 19 ○ Emphysema
 - 20 ○ Asthma
 - 21 ○ Chronic obstructive pulmonary disease
- 22 • Recurrent corneal ulcerative disease
- 23 • Delayed recurrent keratitis of the eye
- 24 • Chronic conjunctivitis
- 25 • Bone marrow depression and related immunosuppression
- 26 • Psychological disorders⁹

27 ⁹ I express no opinion about the long-term *psychological* effects of the mustard gas and
28 Lewisite testing programs on the test subjects, except to state that these effects must also be
(Footnote continues on next page.)

1 (Veterans at Risk at 4-5, 214-226; *Military Medicine* at VET004_001177; see also Namazi, S. et
2 al., “Long-term complications of sulphur mustard poisoning in intoxicated Iranian veterans,” *J*
3 *Med Tox.* 5(4):191-195 (2009); Rowell, M. et al., “The chronic effects of sulfur mustard
4 exposure,” *Toxicology* 263:9-11 (2009).) The authors also found a likely, though not confirmed,
5 link between exposure to sulfur mustard and 1) acute nonlymphocytic leukemia, and 2)
6 reproductive dysfunction due to the mutagenicity, teratogenicity and genotoxicity of mustard
7 agents. (*Veterans at Risk* at 4-5. 214-226.)

8 84. While I have not reviewed all of the underlying data and documents, I have
9 reviewed *Veterans at Risk* and find the reasoning and conclusions of the report sound and
10 consistent with the other scientific and medical literature I have reviewed. (*See, e.g., Veterans at*
11 *Risk* at 87-111, 118-130, 139-147, 167-178.) It is my opinion, based on the discussion in *Veterans*
12 *at Risk*, as well as the other references I have reviewed and my extensive experience in this field,
13 that short term exposure to mustard gas or Lewisite can cause any or all of the diseases and
14 disorders listed above, and that they can arise years after the original exposure, particularly the
15 various cancers. Moreover, given the types and extents of exposures discussed above, and the
16 high degree of uncertainty about the actual dose subjects suffered, I agree that there is likely a
17 causal relationship between exposure to mustard gas or Lewisite during the U.S. testing programs
18 and development of one or more of these diseases or disorders, even years or decades later.
19 Indeed, given the relatively conservative estimates of exposure levels reported in *Veterans at Risk*
20 I believe that test subjects in the military mustard gas and Lewisite testing programs suffered
21 substantial exposures that likely will lead to long-term health effects.

22 85. Evidence from studies of occupational and battlefield exposure to sulfur mustard
23 indicates a causal connection between such exposures and long-term effects such as respiratory
24 and skin cancers. (*See Veterans at Risk* at 97-111.) Given the doses likely experienced by

25
26 (Footnote continued from previous page.)

27 evaluated to arrive at a comprehensive assessment of the effects of the testing of mustard gas and
28 Lewisite on veterans of these testing programs. I understand that the topic of psychological
effects will be addressed by a different expert.

1 subjects of gas chamber and other tests, as discussed above, it is my opinion that they are likely at
2 increased risk for these types of cancers. Moreover, the evidence from therapeutic uses of
3 nitrogen mustard demonstrates a causal relationship between exposure to nitrogen mustard and an
4 increased risk of at least leukemia. (*Id.* at 102-103.) Again, subjects of the various testing
5 programs exposed to nitrogen mustards are, in my opinion, at increased risk of developing such
6 cancers.

7 86. Acute and severe exposure to sulfur mustard, leading to erythema and blistering,
8 has been linked with long-term recurrent skin pigmentation abnormalities, chronic skin ulceration
9 and skin cancers. (*Veterans at Risk* at 167-178; *see also* Namazi 2009 at 192-195; Rowell 2009.)
10 Given that development of erythema was the endpoint for most, if not all, chamber tests, and that
11 the injuries could become much more severe (including severe blistering and crusted lesions as
12 discussed above), it is my opinion that subjects involved in chamber tests would be at an
13 increased risk for developing these kinds of disorders. Similarly, subjects involved in drop or
14 patch type tests, where a subject's skin was exposed directly to liquid or gaseous mustard, would
15 also be at an increased risk for the skin disorders discussed above at least at the site of the test.
16 Moreover, given the rapid absorption and systemic distribution of sulfur mustard, these subjects
17 could experience systemic effects as well. The long-term effects of exposure to mustard gas and
18 Lewisite may become manifest many years after the time of initial exposure or exposures.

19 87. Beyond the increased risk of respiratory cancer, studies of occupational and
20 battlefield exposure to sulfur mustard and/or Lewisite demonstrate that exposure to these
21 compounds increases the risk of victims developing a variety of respiratory disorders, including
22 chronic bronchitis, chronic laryngitis, emphysema, asthma and chronic obstructive pulmonary
23 disease. (*See Veterans at Risk* at 119-130; *see also* Weinberger 2011 at 93; *see also* Namazi 2009
24 at 192-195; Rowell 2009; Ghanei, M. and Harandi, A.A., "Long term consequences from
25 exposure to sulfur mustard: a review," *Inhalation Tox.* 19:451-456 (2007) (hereinafter "Ghanei
26 2007").) Moreover, while an acute response to exposure is a strong indication that subjects will
27 later develop respiratory disorders, even relatively modest exposures are associated with later
28 development of respiratory disorders. (*Veterans at Risk* at 119-130.) Given the extent of

1 exposure subjects used in the human testing programs experienced, particularly during the gas
2 chamber tests, it is my opinion that they are likely at higher risk for these kinds of respiratory
3 disorders, as noted in *Veterans at Risk*.

4 88. With regard to ocular disorders, severe acute injury from sulfur mustard exposure
5 has been linked to recurrent corneal ulcerative disease, while more mild exposures are linked to at
6 least prolonged conjunctivitis. (*See Veterans at Risk* at 139-147; *Handbook of Toxicology*
7 *Chapter 39* at 576, 578 (noting the appearance of recurrent, persistent ocular ulcerations after a
8 latency of 10-25 years in severe acute exposures); *see also* Namazi 2009 at 192-195; Rowell 2009
9 at 10 (noting the emergence of an aggressive form of keratitis 15-20 years after initial exposure).)
10 There seem to have been few reports of ocular involvement during the testing programs—
11 erythema seems to have been the primary endpoint for at least the chamber and drop tests.
12 However, given the prolonged exposure, particularly in the chamber tests, the likely leakage rates
13 of the gas masks used, and the fact that these subjects spent substantial periods of time unmasked
14 while continuing to wear contaminated clothing— I find it likely that subjects were exposed to
15 sufficient levels of sulfur mustard to suffer some eye injury and could be at an increased risk for
16 the disorders mentioned above. Moreover, given the exquisite sensitivity of the eye to sulfur
17 mustard, subjects exposed to sulfur mustard *without* masks or similar protective clothing would,
18 in my opinion, definitely have suffered some acute ocular damage and would likely be at an
19 increased risk for corneal ulcerative disease, prolonged conjunctivitis, and recurrent keratitis of
20 the eye.

21 89. The authors of *Veterans at Risk* recommended that the VA and the Department of
22 Defense, to the extent possible, identify every test subject exposed to any level of mustard gas or
23 Lewisite, inform them of the exposure and the possible health effects, provide a medical
24 evaluation, and give treatment for any disorders linked to their exposure. (*Veterans at Risk* at
25 224-226.) I believe that this is an appropriate approach for at least two reasons. First, it will
26 provide medical evaluation and care to a cohort of veterans. Second, it would provide
27 exceedingly valuable information about the health of these test subjects and add to the body of
28 knowledge about the long-term health effects of exposure to mustard gas and Lewisite. The

1 longitudinal studies currently underway in Iran examining the effects decades after mustard
2 exposure during the Iran-Iraq war are testament to the importance of such monitoring, and have
3 already yielded important insights into the negative long-term health effects of mustard exposure.
4 (*See, e.g.,* Abolghasemi, H. et al., “Childhood physical abnormalities following paternal exposure
5 to sulfur mustard gas in Iran: a case control study,” *Conflict and Health* 4:13 (2010); Namazi
6 2009; Rowell 2009.) While there can be no dispute that exposure to mustard is linked to a variety
7 of long-term health disorders, more data is always helpful in elucidating such effects, and
8 revealing previously unknown ones.

9 90. I have reviewed several letters sent by the Department of Veterans Affairs to
10 veterans or used internally by the VA, and I believe that they are inaccurate in some respects.
11 (*See* Mustard Gas Outreach Letter at VET001_015113-115; Chem-Bio Outreach Letter at
12 VET001_015129-134; Training Letter 06-04 at VET001_015121-128; Clinician’s Letter at
13 VET001_015606-9; Clinician’s Letter at DVA012 000269-271.) For example, the letters note the
14 linkage between exposure to mustard gas and the diseases mentioned above, but suggest that only
15 subjects who experienced “full-body” exposure are at risk of these conditions. (*See*
16 VET001_15607-8; VET001_015114; DVA012 000270.) According to the letters, patch or drop
17 tests are not considered “full-body” exposures and thus do not pose a risk of long-term effects.
18 (*See* VET001_015114 (“VA may grant compensation to veterans who have certain diseases
19 associated with **full-body exposure** to mustard agents or Lewisite during military service. This
20 means that the entire body was exposed rather than just one or more locations on the skin, such as
21 in a ‘patch test.’ Information from DoD shows that while you were exposed to mustard agents or
22 Lewisite, this exposure was not full-body exposure.”) (emphasis in original); DVA012 000270.)
23 The letters also suggest that there is no conclusive link between “full-body” exposure and long-
24 term health effects. (*See* DVA012 000270 (“VA may grant compensation to veterans who have
25 certain diseases associated with **full-body exposure** to mustard agents or Lewisite during military
26 service.”) (emphasis in original).) In my opinion, such statements are medically and scientifically
27 unsupportable. Rather, in my opinion, there is a consensus in the field that mustard gas and
28 Lewisite cause both adverse short and long-term health effects. And, I can state to a reasonable

1 degree of scientific certainty, that the kinds of exposures to mustard gas or Lewisite I understand
2 took place during Defendants' testing programs, whether it be "full-body" or some other type of
3 exposure, would cause adverse health effects such as those discussed above. Stated another way,
4 assuming a population of approximately 60,000 test subjects exposed to mustard and Lewisite, it
5 is scientifically unassailable that at least some of those exposed, regardless of whether
6 "full-body" or another type of exposure, will experience long-term health effects.

7 91. In my opinion the vast majority of the subjects, if not all of them, suffered
8 significant exposure to mustard and/or Lewisite. Given that many of the tests were conducted to
9 the point of failure of the "protective" equipment being tested, I would consider that "full-body"
10 exposure. But even apparently more limited exposures, like skin drop or patch tests, were
11 effectively systemic exposures given the rapid absorption and dissemination of mustard in the
12 human body coupled with its cumulative effects and persistence in the system. Thus, I see no
13 scientific rationale for differentiating between test subjects based on whether they received "full-
14 body" exposure as VA has chosen to define it. All human test subjects exposed to any mustard
15 effectively experienced full-body exposures and are, in my opinion, at an increased risk of long-
16 term health effects resulting from their participation in the military testing programs. And, in my
17 opinion, there is medical value to the subjects and their doctors of knowing the substances, doses,
18 and possible health effects, from a standpoint of prevention and treatment.

19 92. I have also been asked to review the VA's form Chem-Bio Outreach Letter, which
20 I understand was sent to at least some veterans exposed to mustard gas or Lewisite.
21 (VET001_015129-130). The Chem-Bio Outreach Letter is not particularized to reflect the
22 circumstances of any individual's exposures or those of any discrete group. It does not identify
23 what compound or compounds a veteran receiving it was exposed to, nor does it disclose what
24 sorts of long-term effects a veteran might suffer as a result of their exposure. Rather, it states
25 generally, and in my opinion incorrectly, at least with respect to mustard gas and Lewisite, that
26 there are no known long-term health effects from the chemicals tested. (*See* VET001_015130
27 ("Scientists know much about many of the agents used in these tests. In order to best serve
28 veterans and their families, VA continues to study the possibility of long-term health effects

1 associated with in-service exposure to chemical and biological agents. If the medical community
2 identifies such health effects, I assure you that we will share this information with you and other
3 veterans as it becomes available to us.”) Yet the long-term health effects of mustard gas in
4 particular are well known and significant. And, in contrast to the Outreach Letter, I understand
5 that the Department of Veterans Affairs’ internal Chem-Bio Information Letter to clinicians
6 indicates that there are long-term health effects from mustard gas and Lewisite. (*See*
7 VET001_015608 (“Available evidence and follow-up study in general does not support
8 significant long-term, physical harm among subjects exposed to acutely toxic amounts of these
9 agents other than mustard agents and Lewisite.”).)

10 93. The Fact Sheet accompanying the Chem-Bio Outreach Letter also states that the
11 program “evaluated the effects of low-dose exposures to chemical agents.” (VET001_15131.)
12 As noted above, however, for at least the mustard chamber and field tests it was virtually
13 impossible to determine *what* dose subjects actually experienced. I thus find it inaccurate to
14 characterize the doses as “low.” Many, arguably most, of the subjects experienced a sufficiently
15 high dose to cause erythema if not worse, which I consider a significant dose of sulfur mustard.
16 In my opinion, the doses were not so inconsequential as to rule out the possibility of adverse
17 health effects.

18 **B. Irritants.**

19 94. As noted above, little research has been done on the long-term health effects of the
20 irritant compounds tested at Edgewood, including Adamsite, CS, CN and EA-1778. The *NRC*
21 *Report* speculates that long-term health effects are unlikely, though admits that there is no
22 scientific or clinical research to directly support this position. I too have been unable to locate
23 sufficient reliable data demonstrating whether the test subjects exposed to irritants at Edgewood
24 would or would not be more likely to develop long-term health problems than unexposed
25 subjects. In my opinion, however, the subjects of irritant exposures should be contacted and
26 medically evaluated. First, such an outreach program could provide much needed data about the
27 long-term effects of these compounds, the very sort of information that at this time does not exist
28 in the literature. Second, it appears that many of the subjects were exposed to more than one

1 compound, or underwent multiple exposures, and while it is difficult to know the long-term
2 effects of single exposures, it is possible that subjects who endured exposures to compounds that
3 might interact with one another are at even greater risk of adverse health effects. In my opinion it
4 is vital to contact these test subjects precisely because the likely effects of their exposures cannot
5 be determined based on the information currently available.

6 95. As I noted previously, the Chem-Bio Outreach Letter states that test subjects were
7 exposed only to low doses of chemicals. But I do not see how that determination could be made.
8 For example, subjects were frequently exposed to aerosols, and while the aerosol concentration
9 could be determined, the actual exposure was unknown since it depended on how much of the
10 compound was inhaled and absorbed by the skin and eyes. In most, if not all, irritant experiments
11 the exposure was at least sufficient to cause acute effects, which I consider a significant exposure.
12 Indeed, individuals involved in the testing program were apparently concerned by the levels of
13 exposures. I reviewed at least one memorandum criticizing the design of some field tests for
14 exposing subjects to unreasonably high concentrations of CS. (*See* Disposition Form re
15 Volunteer Testing at JK01 0000213-214.) I thus question the basis for the statement in the Chem-
16 Bio Outreach Letter that test subjects were exposed only to low doses.

17 **VII. CONCLUSION**

18 96. It is my opinion that subjects in Defendants' chemical weapons testing programs
19 experienced significant, and often dangerous, levels of mustard and Lewisite exposure, as well as
20 significant irritant exposures. The weight of scientific and medical literature demonstrates that
21 such exposures to mustard and Lewisite can have significant health impacts decades after the
22 acute exposure, while the effects of irritant exposures are currently not fully known.

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97. It is my opinion that the service members who were subjects in the military testing programs are at an increased risk for the kinds of long-term health effects I discuss above.

Respectfully submitted,

Dated: August 7, 2012

Jeffrey D. Laskin, Ph.D.

Exhibit 1

CURRICULUM VITAE
July 18, 2012

NAME: Jeffrey D. Laskin, Ph.D.

PRESENT TITLE: Professor and Chief
Division of Toxicology

ADDRESS: Department of Environmental & Occupational Medicine
University of Medicine and Dentistry of New Jersey
Robert Wood Johnson Medical School
170 Frelinghuysen Road
Piscataway, NJ 08854

EDUCATION:

B.A. (Chemistry and Biology), June 1973, New York University,
University College of Arts and Science, New York
Ph.D. (Pharmacology), September 1977, Dept. of Experimental Therapeutics, Roswell
Park Memorial Institute, State University of New York at Buffalo, Buffalo, New York
Post-doctoral Fellow, Staff Associate, 1977- 1981, Division of Environmental Sciences, Cancer
Center/Institute of Cancer Research, College of Physicians and Surgeons of Columbia
University, New York, NY

ACADEMIC APPOINTMENTS:

Chief, Division of Toxicology (7/1/95 – present)
Department of Environmental & Occupational Medicine
UMDNJ-Robert Wood Johnson Medical School
Piscataway, New Jersey
Professor, Department of Environmental & Occupational Medicine (7/1/93-present)
UMDNJ-Robert Wood Johnson Medical School
Piscataway, New Jersey
Assistant Professor; 5/1/81-6/30/87
Department of Environmental & Occupational Medicine
UMDNJ-Robert Wood Johnson Medical School
Piscataway, New Jersey
Associate Professor; 7/1/87-6/30/93
Department of Environmental & Occupational Medicine
UMDNJ-Robert Wood Johnson Medical School
Piscataway, New Jersey
Member of the Graduate Faculty, Rutgers, The State University of New Jersey, Graduate
Programs in Toxicology, Pharmacology, Biochemistry, Microbiology (1/15/82-present)
Deputy Director, Joint Graduate Program in Toxicology, UMDNJ and Rutgers University

(2003-present)
Member of the Environmental and Occupational Health Sciences Institute (EOHSI)
UMDNJ and Rutgers University (1986-present)
Director, Division of Toxicology, EOHSI (2005-present)
Center Director, UMDNJ-Rutgers University CounterACT Research Center of Excellence
Member of the Cancer Institute of New Jersey (1995-present)
Member of the Corporation of the Marine Biological Laboratory, Woods Hole, MA
(1997-present)
Founding member, Woods Hole Toxicology Forum, Woods Hole, MA (2007-present)
Founding member and Executive Committee member, University Center for Disaster
Preparedness and Emergency Responses (UCDPER)(2007-present)
Advisory Committee, Maria Ferrari Westchester Children's Environmental Health Center,
2009-present.

HONORS

2011 Foundation of UMDNJ Excellence in Research Award, UMDNJ School of Biomedical Sciences

LECTURES AND COURSE DEVELOPMENT

Environmental Medicine, UMDNJ-Robert Wood Johnson Medical School (1981-present)
Environmental Toxicology, UMDNJ-School of Public Health (2003-present)
Skin and Ocular Toxicology, UMDNJ/Rutgers University Joint Graduate Program in Toxicology,
(1986-present)
Mechanisms of Chemical Toxicity- UMDNJ-School of Public Health (2002-present)
Mechanism in Drug Toxicity, Lehigh University Satellite Education Network, Distance Education
Program (2006-2008)
Environmental Toxicology, New York Medical College School of Public Health (2008-present)

UMDNJ/RWJMS COMMITTEES

9/1/93-present	Appointments and Promotions, Dept. Env. and Occupational Medicine
7/1/97-6/30/00	Committee of Review
9/1/97-8/30/99	Cancer Institute of New Jersey Instrument Committee
9/1/04-8/31/07	Institutional Core Facility Committee
9/16/03-10/1/10	Research Day Organizing Committee
9/1/96-present	IACUC Animal Care Committee
1/15/08-present	UCDPER Executive Committee

EOHSI COMMITTEES

2003-present:	EOHSI Directors Cabinet
2003-present:	EOHSI Space Committee
2008-present:	EOHSI faculty recruitment Committee
2008-present:	Student affairs

STATE OF NEW JERSEY COMMITTEES

2008-present:	NJ Department of Homeland Security Preparedness College
2008-present:	Advisory Committee; NJ Universities Homeland Security Research Consortium

2008-present: Executive Committee; NJ Universities Homeland Security Research Consortium

MEMBERSHIP IN PROFESSIONAL ORGANIZATIONS

American Association for Cancer Research
Society of Toxicology
Dermatology Specialty Section, Society of Toxicology
Secretary/Treasurer (2000, 2001), elected position, Dermatology Specialty Section, Society of Toxicology

LOCAL PROFESSIONAL ORGANIZATIONS

1994-present: Founder and organizer, New Jersey Skin Club
2008-present: Founder and organizer, Basic & Applied Dermatology Forum
2008-present: Chairman, Program Committee, Basic & Applied Dermatology Forum
2007-present: Organizing committee, New Jersey Skin Workshop

INTERNATIONAL MEETINGS ORGANIZED

Symposium, "Nitric Oxide in Health and Disease", Piscataway, NJ; 6/23/93-6/26/93
Symposium, "Advances in the Biology of the Skin: Pharmacology and Toxicology",
Piscataway, NJ; 6/24/96-6/27/96
Symposium, "Advances in the Biology & Treatment of the Skin", Piscataway, NJ
6/23/99-6/25/99
"Fourth International Conference on Nitrosative and Oxidative Stress in Disease", New York, NY
(sponsored by the New York Academy of Sciences), 10/28/09-10/30/09

RECENT LOCAL MEETINGS ORGANIZED

NJ Spotlight on Skin Research; Minisymposium, Biomaterials Research Center, Rutgers University.
6/25/07
Basic and Applied Dermatology Research Forum, "Wound Healing and Positive Deviance", EOHSI-
Rutgers University/UMDNJ-Robert Wood Johnson Medical School, 11/04/09

RECENT SERVICE ON FEDERAL COMMITTEES

NIH Study Section, XES1 LWJ-B (MM), 10/18/04-10/19/04
NIH National Institute of Arthritis and Musculoskeletal and Skin Diseases Roundtable on Wound
Healing, 1/16/07-1/17/07
Department of Defense, DTRA FY08 Joint Science and Technology Office for Chemical and
Biological Defense (JSTO-CBD) Scientific Review; Respiratory and Systemic
Therapeutics: 4/04/07-4/05/07
NIH, Allergy, Immunology & Transplantation Research Review Committee (AITRC): 3/03/08-
3/04/08
Department of Defense, DTRA FY09 Joint Science and Technology Office for Chemical and
Biological Defense (JSTO-CBD) Scientific Review: 4/07/08-4/08/08
NIH Study Section. CounterACT review ZNS1 SRB-R (33): 4/22/08-4/23/08
NIH Study Section, NIEHS ONES ZES1 JAB-G-R3: 2/10/09-2/11/09
NIH Study Section, NIEHS ONES ZES1 TN G T1 C: 2/10/09
NASA Advanced Environmental Health/Advanced Food Technology Committee, Houston, TX,

11/8/09-11/7/12
NIH Study Section, NIH ZRG1 IMST-A: 11/12/09-11/13/09

RECENT INVITED PRESENTATIONS (2007-present):

- 4/26/07, "Laminins and the Extracellular Matrix as Targets for Sulfur Mustard", 1st Annual CounterACT Network Research Symposium, Arlington, VA.
- 6/25/07, "Oxidative Stress and Skin Toxicity", NJ Spotlight on Skin Research; Minisymposium, Biomaterials Research Center, Rutgers University.
- 10/12/07, "Sulfur Mustard Countermeasures: NATO conference on Defense against the Effects of Chemical Hazards, Edinburgh, Scotland.
- 11/14/07, "Mechanism of Cutaneous Inflammation", Dermal Clinical Evaluation Society, Glenpointe Marriott, Teaneck, NJ
- 2/21/08, "The UMDNJ/Rutgers University CounterACT Research Center of Excellence", Robert Wood Johnson Medical School Executive Council, New Brunswick, NJ
- 4/16/08, "Oxidative Stress in Chemical-induced Skin Injury", 2nd Annual CounterACT Network Research Symposium, Washington, DC.
- 4/25/08, "Treatments for Sulfur Mustard Poisoning", Department of Chemistry, Lehigh University, Bethlehem, MA
- 8/03/08, "Risks from Exposure to Sulfur Mustard", Woods Hole Toxicology Forum, Woods Hole Oceanographic Institute, Woods Hole, MA
- 9/18/08, "Perspectives in Homeland Security Research", Department of Environmental Health, New York Medical College School of Public Health
- 10/24/08, "The UMDNJ/Rutgers University CounterACT Research Center of Excellence", Biomedical Advanced Research and Development Authority (BARDA), 2009 HHS Public Health Emergency Medical Countermeasures (PHEMC) Enterprise Stakeholders Workshop, Marriott, Arlington, VA
- 11/5/08, "Oxidative Stress in Sulfur Mustard Toxicity"; Lovelace Respiratory Research Institute, Sulfur Mustard Symposium, Albuquerque, NM
- 12/18/08, "Thioredoxin reductase as a target for sulfur mustard", Biomaterials Center, Rutgers University
- 4/15/09, "Antioxidants as Countermeasures to Sulfur Mustard", 3rd Annual CounterACT Network Symposium, Washington, DC
- 6/8/09, "Drug Development under the FDA Animal Efficacy Rule", Johnson and Johnson Pharmaceutical Research Institute, Raritan, NJ.
- 7/28/09; "Mechanisms of inflammation", Javelin Pharmaceuticals, Cambridge, MA.
- 7/29/09; "Redox cycling of 2- and 4-hydroxyestrogen catechol metabolites in breast epithelial cell lines", 2009 Gordon Research Conference on Hormones & Cancer, Holderness School, NH
- 8/7/09; "Mechanisms mediating chemical redox cycling", Woods Hole Oceanographic Institute, Woods Hole, MA
- 8/8/09; "US efforts to combat chemical terrorism", Woods Hole Educational Forum, Woods Hole, MA
- 11/30/09; "Oxidative stress induced by chemical alkylating agents", New York Academy of Sciences symposium on Oxidative and Nitrosative Stress, New York, NY.
- 5/2/10; "Mechanism of action of sulfur mustard and related alkylating agents, Department of Chemistry, Lehigh University.
- 3/8/11; Control of Stem Cell Differentiation in the Lung. Society of Toxicology, Washington, DC.
- 4/29/11; The Threat of Chemical Terrorism, Department of Environmental Medicine, New York University, Sterling Forest, NY
- 6/22/11; Mechanisms of Action of Chemical Threat Agents, 5th Annual CounterACT Network Research Symposium, Washington, DC
- 6/26-28/11: Overview of the UMDNJ-Rutgers University CounterACT Research Center of Excellence, 6th Annual CounterACT Network Research Symposium, San Francisco, CA

MENTORED GRADUATE STUDENTS

Linda Piccinini (Microbiology, Ph.D., 1985)
Christopher Molloy (Toxicology, Ph.D., 1986)

Edmund Lee (Toxicology, MD/Ph.D., 1987)
Edward Yurkow (Toxicology, Ph.D., 1988)
Fred Mermelstein (Toxicology, Ph.D., 1990)
Adrienne Garcia-Welsh (Nutrition, Ph.D., 1993)
Diane E. Heck (Toxicology, Ph.D., 1994)
Anthea Dokidis (Biochemistry, Ph.D., 1995)
Carol Faaland (Biochemistry, Ph.D., 1997)
John Mitchell (Toxicology, Ph.D., 1997)
Yang Jin (Toxicology, MD/Ph.D., 1997)

George DeGeorge (Pharmacology, Ph.D., 1999)
Blase Billack (Toxicology, Ph.D., 2001)
Anna Vetrano (Biochemistry, Ph.D., 2002)

Valescia John (Toxicology, M.S., 2003)
Adrienne Black (Toxicology, Ph.D., 2007)
Karma Fussell (Toxicology, Ph.D., 2007-2011)
Ruijin Zheng (Toxicology, 2005-present)
Irene Wolman (Toxicology, 2008-present)
Ronald Udasin (Toxicology, 2009-present)

POST-DOCTORAL FELLOWS

Tanveer Abidi, Ph.D. (1987-1989)
Leslie Helyer, Ph.D. (1990-1993)
Chitra Punjabi, Ph.D. (1991-1993)
Randy Shuler, Ph.D. (1991-1994)

Runa Sur, Ph.D. (2000-2001)
Rupa Mukhopadhyay, Ph.D. (2003-2005)
Anna Vetrano, Ph.D. (2003-2005)

Joshua Gray, Ph.D. (2003-2006)
Adrienne Black, Ph.D. (2009-2011)
Vladimir Mishin, Ph.D. (2005-present)
Yun Wang, Ph.D. (2006-present)
Shaojun Yang, Ph.D. (2007-present)
Yi-Hua Jan, Ph.D. (2007-present)
Jamie Bernard, Ph.D. (2011-present)

RESEARCH ASSISTANT PROFESSORS

Diane Heck, Ph.D. (1996-2004)
Thomas Mariano, Ph.D. (1997-2003)
Michael Shakarjian, Ph.D. (2005-2008)

Current position

Medical Scientist at Biogen Idec
Rutgers University, Ernest Mario School of
Pharmacy (Professor II & Dean)
Rockefeller University (Chief of Dermatology)
Johnson & Johnson (Principal Scientist)
Javelin Pharmaceuticals (President & CEO)
Consultant in Nutrition Sciences
New York Medical College (Professor & Chair)
Affymetrix, Inc. (Staff Scientist)
Consultant in Toxicology
Hurley Consulting (Consultant in Toxicology)
Brigham and Women's Hospital, Harvard University
(Assistant Professor)
M & B Laboratories (President and CEO)
St. Johns University (Associate Professor)
UMDNJ-Robert W Johnson Medical School
(Assistant Professor)
Johnson & Johnson (Scientist I)
Rutgers University (Research Teaching Spec)
Res. Scientist, BASF, Germany

Current position

Kean University (Assistant Professor)
Consultant in Nutrition Science
Consultant in Toxicology
Environmental Resources Management
(Senior Toxicologist)
Johnson and Johnson (Staff Scientist)
Johnson and Johnson (Staff Scientist)
UMDNJ-Robert W Johnson Medical School
(Assistant Professor)
US Coast Guard Academy (Assistant Professor)
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Joshua Gray, Ph.D. (2006-2008)

US Coast Guard Academy (Assistant Professor)

STUDENT COMMITTEES:

Active member of Rutgers University and University of Medicine and Dentistry of New Jersey graduate programs in Toxicology, Molecular Biosciences, Biochemistry, Cell and Molecular Biology, and Nutrition. Involved in teaching and serving on various program and student committees including qualifying examination committees and doctoral defense committees.

PATENTS

- US patent #5,216,176 (June 1, 1993) "7-Alkoxycoumarins, dihydropsoalens and benzodipyranones as photoactivated therapeutics"
- US patent #5,356,929 (October 18, 1994) "Reduced and quaternized psoralens as photoactivated therapeutics"
- US patent #5,473,083 (December 5, 1995) "Reduced and quaternized psoralens as photoactivated therapeutics"
- US patent #5,695,761 (December 9, 1997) "Suppression of nitric oxide production by osteopontin"
- US patent #6,177,424 (January 23, 2001) "4'-substituted-4',5'-dihydropsoalens and therapeutic Uses thereof"
- US patent #6,255,324 (July 3, 2001) "Amino- and mercurio-substituted 4',5'-dihydropsoalens and therapeutical uses thereof"
- US patent #7,015,022 (March 21, 2006) "Mammalian catalase-dependent oxidation processes and methods for stimulating oxidative activities"
- US patent #7,105,511 (September 12, 2006) "Fluorescent fused-ring triazoles that inhibit cell proliferation and uses thereof"
- US Patent #7,150,967 (December 19, 2006) "Fluorescent tags for amino acid and nucleic acid analysis"
- US Patent #7,598,238 (October 6, 2009) "Fluorescent fused-ring triazoles that inhibit cell proliferation and uses thereof"
- US Patent #8,071,642 (December 6, 2011) "Dimethyl amino ethyl ether psoralens and methods for their production and use"
- US patent pending (publication number 20030225148) "Biological methods of use of 4-amino-3-mercapto-triazoles"
- US patent pending (publication number 20040225000) "Methods of producing 4-amino-3-mercapto-triazoles"
- US patent pending (submitted by UMDNJ November 3, 2009) "Unique dual action therapeutics"
- US Provision patent (submitted by UMDNJ September 15, 2009) "Pharmacologically active vanilloid carbamates"

PUBLICATIONS

JOURNAL ARTICLES

1. Laskin JD, Evans RM, Slocum HD, Burke D, Hakala MT. (1979). Basis for natural variations in sensitivity to 5-fluorouracil in mouse and human cells in culture. *Cancer Research*, 39, 383-390.
2. Mufson RA, Laskin JD, Fisher PB, Weinstein IB. (1979). Melittin shares certain cellular effects

with phorbol ester tumor promoters. *Nature*, 290, 72-74.

3. Laskin JD, Mufson RA, Weinstein IB, Engelhardt DL. (1980). Identification of a distinct phase during melanogenesis that is sensitive to extracellular pH and ionic strength. *J. Cellular Physiology*, 103, 467-474.
4. Laskin DL, Laskin JD, Weinstein IB, Carchman RA. (1980). Modulation of phagocytosis by tumor promoters and epidermal growth factor in normal and transformed macrophages. *Cancer Research*, 40, 1028-1035.
5. Evans RM, Laskin JD, Hakala MT. (1980). Assessment of growth limiting events caused by 5-fluorouracil in mouse and human cells. *Cancer Research*, 40, 4113-4122.
6. Laskin DL, Laskin JD, Weinstein IB, Carchman RA. (1981). Induction of chemotaxis in mouse peritoneal macrophages by phorbol ester tumor promoters. *Cancer Research*, 41, 1023-1028.
7. Laskin JD, Mufson RA, Piccinini L, Engelhardt DL, Weinstein IB. (1981). Effect of tumor promoters on newly synthesized proteins in mouse epidermis. *Cell*, 25, 441-450.
8. Evans RM, Laskin JD, Hakala MT. (1981). Effect of excess folates and deoxyinosine on the activity and site of action of 5-fluorouracil. *Cancer Research*, 41, 3288-3295.
9. Pietropaolo C, Laskin JD, Weinstein IB. (1981). Effect of tumor promoters on sarc gene expression in normal and transformed chick embryo fibroblasts. *Cancer Research*, 41, 1565-1571.
10. Matthew E, Laskin JD, Zimmerman EA, Weinstein IB, Hsu KD, Engelhardt DL. (1981). Benzodiazepines have high affinity binding sites and induce melanogenesis in B16/C3 melanoma cells. *Proceedings of the National Academy Sciences, USA*, 78, 3935-3939.
11. Laskin DL, Laskin JD, Weinstein IB, Carchman RA. (1981) Enhancement of macrophage-induced cellular cytotoxicity by phorbol ester tumor promoters, *Cancer Research* 41, 4523-4528.
12. Laskin JD, Piccinini L, Engelhardt DL, Weinstein IB. (1982). Control of melanin synthesis and secretion in B16/C3 cells. *Journal Cellular Physiology*, 113, 481-486.
13. Laskin JD, Piccinini L, Engelhardt DL, Weinstein IB. (1983). Specific protein production during melanogenesis in B16/C3 melanoma cells. *Journal Cellular Physiology*, 114, 114-121.
14. Molloy CJ, Gallo MA, Laskin JD. (1984). Effect of the chemical irritants anthralin and benzoyl peroxide and mouse skin epithelial cell protein production. *Journal Society Cosmetic Chemists*, 35, 197-205.
15. Hsu L, Natyzak D, Laskin JD. (1984). Effect of the tumor promoter 12-O-tetradecanoyl phorbol-13-acetate on neurite outgrowth from sensory ganglia. *Cancer Research*, 44, 4607-4614.
16. Laskin JD, Lee E, Yurkow E, Laskin D, Gallo MA. (1985). A possible mechanism of psoralen toxicity not involving direct interaction with DNA. *Proceedings National Academy*

Sciences, USA, 82, 6158-6162.

17. Molloy CJ, Laskin JD. (1985). Alterations in mouse epidermal keratin production induced by dietary vitamin A deficiency. *Annals New York Academy Sciences*, 455, 739-740.
18. Laskin JD, Lee E, Laskin D, Gallo MA. (1986). Psoralens potentiate UVA light induced inhibition of epidermal growth factor binding. *Proceedings National Academy Sciences, USA*, 83, 8211-8215.
19. Laskin JD, Piccinini L. (1986). Tyrosinase isozyme heterogeneity in differentiating B16/C3 melanoma. *Journal Biological Chemistry*, 261, 16626-16635.
20. Yurkow EJ, Laskin JD. (1987). Characterization of a photoalkylated psoralen receptor in HeLa cells, *Journal Biological Chemistry*, 262, 8439-8442.
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23. Laskin DL, Gardner CR, Laskin JD. (1987). Induction of chemotaxis in mouse peritoneal macrophages by activators of protein kinase C. *Journal Leukocyte Biology*, 41, 474-480.
24. Laskin DL, Sirak AA, Pilaro AM, Laskin JD. (1988). Functional and biochemical properties of rat Kupffer cells and peritoneal macrophages. *Journal Leukocyte Biology* 44, 71-78.
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26. Molloy CJ, Laskin JD. (1988). Keratin polypeptide expression in mouse epidermis and cultured epidermal cells *Differentiation* 37, 86-97.
27. Laskin DL, Robertson FM, Pilaro AM, Laskin JD. (1988). Activation of liver macrophages following phenobarbital treatment of rats, *Hepatology*, 8, 1051-1055.
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(Neodol-12) and other surfactants in the assay of protein kinase C. *Biochemistry Biophysica Acta*, 992, 362-368.

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35. Robertson FM, Beavis AJ, Oberyshyn TM, O'Connell SM, Dokidos A, Laskin DL, Laskin JD, Reiners JJ. (1990). Production of hydrogen peroxide by murine epidermal keratinocytes following treatment with the tumor promoter 12-O-tetradecanoylphorbol-13-acetate. *Cancer Research*, 50, 6062-6067.
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neutrophils. *Journal Leukocyte Biology*, 49, 369-379.

44. Laskin JD, Dokidis A, Sirak A, Laskin DL. (1991). Distinct patterns of proteoglycan biosynthesis in human granulocytes, monocytes and differentiated myeloid leukemia cells, *Leukemia Research*, 15, 515-523.
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regulation of wound healing. *Journal Biological Chemistry*, 267, 21277-21280.

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62. Punjabi CJ, Laskin JD, Huang S-m, MacEachern L, Laskin DL. (1994). Enhanced production of nitric oxide by bone marrow cells and increased sensitivity to macrophage colony stimulating factor (CSF) and granulocyte-macrophage CSF after benzene treatment of mice. *Blood*, 83, 3255-3263.
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