

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON

JAMES RODDEN, *et. al.*,
Plaintiffs,

v.

ANTHONY FAUCI, *et. al.*,
Defendants,

Civil Action No. :

DECLARATION OF ROY EGBERT

1. I, Roy Egbert, a resident of New Jersey, am of legal age and make this declaration on personal knowledge.

2. I am a civilian employee with the Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations. I have a combined 16 years, 4 months working for the Federal Government.

3. I was confirmed COVID-19 positive, via Polymerase chain reaction (PCR) testing and symptomatic disease, on November 11, 2020, from a sample collected on November 10, 2020. I am long-term Covid-19 antibody positive via lab work (blood tested).

4. I have taken antibody tests and have been confirmed as having natural immunity.

5. My employer has stated that pursuant to the Presidential Executive Order, and follow-on rules, that they require me to be vaccinated.

6. It is my belief, based on evidence, that I am neither in danger, nor am I a danger to others.

7. I wish to make my own medical choices and am fearful of a government employer declaring this attack on my bodily integrity with no reasonable cause.

8. The pressure put on me to conform—with threatened termination by November 22, 2021, if not earlier, is enormous-and should I conform, it would prevent an adjudication of my constitutional and statutory rights to informed consent and bodily integrity.

9. Putting aside the uselessness of a vaccine to someone with natural immunity, and the safety of the various emergency use vaccines long-term, a common side effect of the vaccines is a sore arm and mild fatigue.

10. I do not believe my employer can, nor do I want it to be able to, force me to accept the equivalent of a punch in the arm whenever it likes on pain of termination for no known improvement of the safety of others.

11. Taking the vaccine, which for me is a medically useless act, would irreparably harm me in my person and in my control over my life and body.

12. Even should I prevail in some separate forum after threatened termination, the time out of the labor force, effect on my psyche and well-being would never be recovered.

I declare under penalty of perjury the foregoing is true and correct.

Date: November 4, 2021



Roy Egbert