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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

FOOD & WATER WATCH, INC, et al.,
Plaintiffs,

v.

U.S. Environmental Protection Agency,
et al.,
Defendants.

Case No.: 17-cv-02162-EMC

**DECLARATION OF
JESSICA TRADER**

I, Jessica Trader, hereby declare as follows:

I am over the age of eighteen (18) years of age and make this statement based on personal knowledge. I am competent to testify to each of the statements made herein.

1 I am a dues-paying member of the organization Food & Water Watch. I have been a member since 2016.

2 I was born on May 27, 1986 and am currently 36 years old.

3 On November 17, 2019, I got engaged to my husband Drew Kaplan, whom I have since married.

4 In August 2020, my husband and I moved from San Francisco, California to Leawood, Kansas. The public water supply in Leawood is treated with fluoridation chemicals.

5 In the fall of 2020, Drew and I began actively seeking to have a baby and in, or about, November 2020 I was blessed to become pregnant with my first child. (A photo of my husband and I when I was six months pregnant is attached as **Exhibit A.**)

6 On August 30, 2021, I gave birth to my daughter Olive Kaplan. Olive is now about 20 months old. (Photos of Olive and I shortly after her birth are attached as **Exhibit B.**)

Trial Exhibit

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1 7 I recently stopped taking birth control medication as my husband and I are now
2 seeking to have another child. We hope to have a third child one day as well.

3 8 I have long been concerned about the health impacts of fluoridation chemicals.
4 My concern was initially triggered when my dentist diagnosed me as suffering from a
5 condition called dental fluorosis. My dentist told me that this condition, which has caused
6 staining and brittleness of my teeth, was caused by too much exposure to fluoride while my
7 teeth were developing.

8 9 As a mother, my primary concern about fluoridation chemicals is the potential
9 adverse impacts they could have on my child and future children. I am particularly concerned
10 about the impact these chemicals could have on their brain development.

11 10 I am not a scientist, but the growing number of studies linking prenatal and
12 early childhood fluoride exposure to impaired neurodevelopment is deeply troubling to me. I
13 understand some of these studies have been funded by the National Institute of Health and
14 addressed fluoride levels that are similar to what I and my children would ingest if we drank
15 our city's fluoridated city water. I also understand that the fluoride consumed by a pregnant
16 mother has access to the baby, including the baby's brain.

17 11 Given the recent studies on fluoride's neurodevelopmental hazards, I have done
18 everything within my power to protect Olive from fluoridation chemicals.

19 12 While pregnant with Olive, I strictly avoided drinking fluoridated tap water by
20 regularly purchasing bottled water and purchasing a water filter that removes fluoride from the
21 water we use at home to cook. I also purchased replacement cartridges to ensure that the water
22 filter was working effectively.

23 13 When Olive was born, I continued to take these measures to protect her from
24 fluoridation chemicals. Upon introducing water into Olive's diet at 6 months of age, I have
25 strived to provide her only non-fluoridated, or defluoridated, water. This has required ongoing
26 and frequent purchases of bottled water.
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14 Periodically purchasing filter cartridges and regularly purchasing bottled water in order to protect Olive, both prenatally and postnatally, has been a substantial expense for me these past three years, and will remain an expense in the years ahead.

15 As long as fluoridation chemicals are added to my city's water supply, I will continue incurring these costs to protect Olive throughout her childhood. I will also do the same if and when I am blessed to become pregnant with a second and third child.

16 Even if fluoridation posed no risk to myself, I would absolutely still incur these costs to protect Olive as protecting her is my top priority and I understand that fluoride's neurological risks are greatest during the childhood years.

17 I declare under penalty of perjury that the foregoing statements are true and correct to the best of my personal knowledge and belief.

Executed on May 1, 2023 in Leawood, Kansas.



JESSICA TRADER

Exhibit A



Exhibit B



