

State of Iowa)

County of Harrison)

Exhibit 19

Affidavit of Lee Merritt, MD

Date: June 13, 2024

Identification:

My name is Lee Merritt, MD. I live at 524 W 4th St., Logan, IA, 51546 in Harrison County, Iowa. My age is 71.

Qualifications:

I am a medical doctor licensed by the Iowa Board of Medicine. I graduated from University of Rochester School of Medicine and Dentistry in 1980. I completed residency training in Orthopaedic Surgery at Naval Hospital San Diego, CA in 1987 and an Orthopaedic Spinal Surgery Fellowship in University of Rochester Strong Memorial Hospital in 1990. I served over 10 years as an officer in the United States Navy Medical Corps, leaving with the rank of Commander.

Facts:

In my experience as a physician who treats patients with COVID-19 and from the study of medical literature pertaining to COVID-19, it is my medical opinion that ivermectin and other "off-label" drugs when given early hospitalization and death from COVID-19.

On or about 10 January 2022, I prescribed Ivermectin for Marty Bach for illness consistent with COVID-19. My prescription was transmitted to Walgreens pharmacy in Council Bluffs, Iowa. Walgreens pharmacy refused to fill the prescription. It is my medical opinion that, within a reasonable level of medical error, this patient died as a result of being deprived of medical care in that they were unable to have their prescription for Ivermectin filled.

I received the Original Joint Statement which discouraged the use of Hydroxychloroquine dated March 26, 2020. My interpretation of this letter was that physicians who treat COVID-19 or pharmacists who fill prescriptions for "off-label" might face disciplinary action.


In addition, I am aware of the article in the Cedar Rapids Gazette dated December 17, 2021 entitled "Dozens of Doctors Under Investigation for Spreading False Information About COVID-19". Any investigation by the Board of Medicine is very expensive for a physician to defend against and even an on-going investigation can have serious effects to a medical career.

On January 19, 2022, I received an investigational letter from the Iowa Board of Medicine stating that I was under investigation for "spreading misleading information about COVID-19" and "prescribing 'off-label' drugs to treat COVID-19. While the Board of Medicine never specified what constituted "mis-leading information about COVID-19", it appears that this investigation was undertaken in response to public statements which I made critical of the military requiring vaccination of all service personnel. In all, I was under investigation for over a year and a half

before I pointed out to the chief of the medical board that the Governor of Iowa herself was requesting the military mandate be stopped—which was my whole point.

It is my hope that the Court will enjoin the Iowa Board of Medicine misusing prolonged and illegal investigations in order to silence physicians who speak about COVID-19 and allow free communication about the subject without physicians fearing the loss of their license. I hope that the Board of Pharmacy will enforce its rule concerning non-discrimination against patients with COVID-19 and allow them to receive treatment for their disease.

I, Lee Merritt, MD, swear under penalty of perjury that the foregoing statement is true to the best of my knowledge.



Lee Merritt, MD

6-14-24

Date

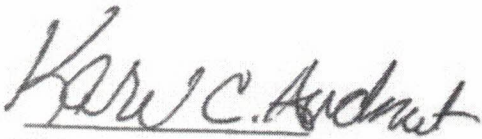
General Affidavit

The named person, Lee Merritt, who is a resident of Harrison County in the State of Iowa personally came and appeared before me, the undersigned Notary Public and makes the foregoing statements, testimony, and General Affidavit, under oath or affirmation, in good faith, and under penalty of perjury, of sincere belief and personal knowledge that the foregoing matters, facts, and things set forth are correct and true to the best of his knowledge.

State of Iowa

County of Harrison

Subscribed and sworn to or affirmed before me on this ¹⁴14th day of June, 2024 by affiant Lee Merritt.



Notary Public

6/14/24

Date

1/29/25

My commission expires



1/29/25