

5-18-2007

Hysteria, Greed, and the Public Purse: The Litigation Impacting a Local Governmental Agency

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Hysteria, Greed, and the Public Purse:
The Litigation Impacting a Local Governmental Agency

Submitted to the Graduate Faculty of the
University of New Orleans
in partial fulfillment of the
requirements for the degree of

Doctor of Philosophy
in
Urban Studies

by

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B.A. Loyola University New Orleans, 1971
M.S.U.S. University of New Orleans, 1988

May, 2007

DEDICATION

To George.....

You won! Our day has come!
I am walking across the stage ahead of you...
yet...
because of you!

You have made me a better person in mind and spirit!

I love you!

ACKNOWLEDGEMENT

As I conclude my studies in the Ph.D program in Urban Studies, I would like to thank a few people who have greatly assisted me during this long journey.

To former Louisiana State Representative Charles Emile "Peppi" Bruneau, Jr. who retired recently after serving over thirty years in the Louisiana House of Representatives. The Krewe of Endymion may have been the reason for his visit, but he was actually an "Angel" sent to me by God in my hour of need.

To the late Robert O. Washington, Ph.D., former Dean of the Graduate School at UNO, for taking the time to assess a situation that was wrong and making it right. In later years, I enjoyed being a student in his Environmental Justice class, shortly before his untimely death. To the end, he was a dedicated teacher putting his students first even when his health was in a state of constant decline. I wish that God had spared him to be with me on graduation day. He would be the first person I would embrace and thank.

I would like to thank my committee members, Jane Brooks, John Wildgen, and Bob Whelan for being there at the beginning and at the end of this journey and assisting me with their time, patience, and encouragement.

To Fritz Wagner, Ph.D., chairman of my committee for his prodding, reassurance, diplomacy, attention to detail, and constant encouragement. As Dean of the College of Urban and Public Affairs, he was constantly involved in local, state, and national affairs in urban studies, inspiring his students and helping to make New Orleans a better place to live.

I am left with a few more people to thank. My mother, Marie B. DiRosa, always put the health, education, and welfare of her children first. She is a beautiful role model. She expects the best from her children in everything we do and showers us all with her love and attention. I have been truly blessed by her devotion.

The Superdome would not have been a big enough venue to hold all the people my grandmother, Clara E. Buffa, would be calling to tell about this latest achievement in my life. I miss her daily just like she said I would.

My sons, Renny and Jeffrey, are my greatest gifts from God. I know you are as proud of your Mother as I am of you. Always be true to yourselves and the ones you love.

And, finally, thanks to almighty God for giving me the strength and energy to run this race to the finish. My trust and faith in Him have brought me countless little miracles...miracles that have lifted each and every new barrier blocking my way.

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ABSTRACT

This research is a case study of the litigation in progress by hundreds of St. Bernard Parish families against the Sewerage and Water Board of New Orleans and Browning Ferris Industries (BFI). The families are suing for personal and property damages sustained as a result of the poor operation and maintenance of the East Bank Sewerage Treatment Plant (EBSTP) and the Crescent Acres Landfill.

The purpose of the study will be to examine the consequences, links, and process of interaction among three key units of analysis: the plaintiffs, their lawyers, and one of the major defendants in the litigation, the Sewerage and Water Board of New Orleans; and, three basic concepts related to each study group: the hysteria of the neighborhood, the greed of the lawyers, and the vulnerability of the public sector to litigation. I postulate that the plaintiffs' lawyers, originally retained to assist the neighborhood in their fight for closure of the landfill, became motivated by greed to expand the neighborhood fight and bring it to a more lucrative conclusion. By engaging their trust, the lawyers were able to organize the neighborhood and plant the seeds for mass psychogenic illness and neighborhood hysteria. The resulting litigation illustrates the vulnerability of the public sector to contrived litigation and the concomitant consequences to John Q. Citizen and the public purse. This research will contribute to our understanding of the concepts of greed and hysteria, will provide much needed insight on public service agency vulnerability, and will offer solutions to the problems encountered by public service agencies in providing legally mandated services.

CHAPTER I

INTRODUCTION

This research is a case study of the litigation in progress by hundreds of St. Bernard Parish families against the Sewerage and Water Board of New Orleans and Browning Ferris Industries (BFI). The families are suing for damages sustained as a result of the poor operation and maintenance of the East Bank Sewerage Treatment Plant (EBSTP) and the Crescent Acres Landfill. The plaintiffs maintain they have sustained both personal injuries and property damages because of their homes' close proximity to both of these facilities. Their attorneys and the scientific experts they have retained assert that air emissions and groundwater contamination from the East Bank Sewerage Treatment Plant and the Crescent Acres Landfill have produced serious health problems, terminal cancers, heart and lung diseases, and respiratory problems for their clients.

The plaintiff claim forms, completed early in the litigation process, enumerate a variety of medical ailments attributable to alleged exposure to toxic emissions. The ailments range in severity, from minor respiratory infections, sore throat, sinus infections, and burning eyes to incidences of cancer, emphysema, and heart disease. In addition, most litigants claim to fear contracting cancer and other terminal diseases as a consequence of their exposure to toxic substances. However, some plaintiffs admit having no physical complaints at all.

The residents also maintain that the noxious odors produced by the Crescent Acres Landfill and the East Bank Sewerage Treatment Plant constitute a nuisance and that these odors, when coupled with the effects on the health and well-being of the residents, are responsible for widespread property devaluation in the area.

It is important to note that this lawsuit is strictly an outgrowth of the community's displeasure with the odors emanating from the Crescent Acres Landfill. The neighbors banded together and formed a citizen action group to force the closure of the landfill and an end to the recurring odors. Outspoken neighbors sent newsletters, met regularly, called upon public officials for action, and even sought legal advice in their fight to close the landfill. By generating excitement and a call to action, the activist neighbors and their legal advisors were able to produce an atmosphere of fear and anxiety among the area residents.

The lawyers attended the monthly meetings and offered their expertise in fighting the landfill, forcing its closure, and seeking retribution for the public nuisance the landfill had created. As the neighborhood group grew in size and prominence, neighborhood agitation and anxiety increased accordingly. More and more neighbors were asked to participate in the landfill closure movement. Guest speakers were invited to the meetings, more neighbors were recruited to join the ranks, public officials were held accountable, and the momentum continued to build.

The anxiety, the residents' fear of the unknown, and their excitability were all manifestations of what I believe can be called hysteria. Regular meetings, newsletters, and neighborly visits all fueled this hysteria. The attorneys' regular attendance and updates at neighborhood meetings and their goodwill gestures to the community helped solidify the public and gave credence to their fears. As a result of the hysteria, the residents came to trust in the lawyers who they believed would help in their fight for the landfill closure. The lawyers, motivated by money and self-interest, were all too willing to consolidate and push the neighborhood's claims into the legal arena where all parties could be well compensated.

Rationale for the Study

In their efforts to achieve maximum rewards for their clients, the plaintiffs' lawyers sued not just the Crescent Acres Landfill but also the Sewerage and Water Board of New Orleans and the Department of Environmental Quality. This research focused on the Sewerage and Water Board, a public body funded entirely by the sale of water and sewer services to the public. The Sewerage and Water Board's infrastructure is old, antiquated, and in dire need of repair as are the facilities it operates, but it has trouble staying abreast of costs because fees are determined by public referendum. As a result, its employees are for the most part underpaid, under-trained, and poorly supervised civil service workers.

Several years ago, the members of the board of the Sewerage and Water Board voted to hire PSG, an outside contractor to operate its sewerage treatment plants. Civil service employees working at these plants were either hired by PSG or were relocated to other positions within the Sewerage and Water Board.

The Sewerage and Water Board has been under much scrutiny in recent years. The United States Environmental Protection Agency sued the Sewerage and Water Board in the early 1990s for serious environmental violations. The terms of the settlement agreement called for the Sewerage and Water Board to make necessary repairs to its facilities and infrastructure within federally monitored timelines.

The rationale for this case study became clear to me as I was the paralegal who prepared documents for use at trial in this litigation. Public outcry for privatization of this public body is now a thing of the past. For the foreseeable future, the Sewerage and Water Board will remain a quasi-public agency. Facilities in need of repair, lack of adequate funding, a politically appointed board, low employee morale, and marginally competent and poorly trained civil service workers

are all indicative of the Sewerage and Water Board's vulnerability to attack by well-financed, well-prepared plaintiffs' attorneys.

This case study is only one of a multitude of lawsuits filed against the Sewerage and Water Board of New Orleans. This research will, therefore, provide much needed insight on public service agency vulnerability and will offer solutions to the problems encountered by public service agencies in providing legally mandated services. At the same time, it will add to the constantly evolving body of knowledge regarding both hysteria and greed in American culture.

Personal Interest in the Case Study

As a paralegal working on this litigation, it was my job to read, index, categorize, synopsise, and organize the millions of pages of documents to be used in the trial of this case. Indexes and databases were prepared for every single sheet of paper. Thousands of copies of documents were made by outside copying services and turned over to all counsel of record involved in this case. File cabinets and several file rooms were filled to capacity and still more room was needed to house all of the documents pertinent to this case.

The more I read, the more there was to read. This case became a full time job for me and required assistance from another paralegal and several secretaries and that was for document management purposes only. Every hour, every quarter hour of time was accounted for and billed to the Sewerage and Water Board. Every fax was logged in, every in-house copy was logged and charged, every telephone call was logged and billed, and every paper filed in the court record was filed by a court runner. What troubled me the most was the utter vulnerability of the Sewerage and Water Board in defending itself when sued and the astronomical costs associated with such large scale litigation defended by outside counsel.

Once the plaintiff claim forms began trickling into the office and I had a chance to study them, I was even more awestruck. All of this work in document management, all of the time expended, all of the legal costs incurred in defending this lawsuit, and all because of runny noses and watery eyes of the plaintiffs. The residents smelled an offensive odor, believed it was coming from the BFI dump site, could not get it closed, and so they hired attorneys to mediate on their behalf. Once the attorneys were retained to help in the closure of the landfill, the situation snowballed out of control. The plaintiff attorneys sued the landfill and also added the Sewerage and Water Board and the Louisiana Department of Environmental Quality as defendants in the litigation.

These claimants and their lawyers cost the Sewerage and Water Board hundreds of thousands of dollars in trial preparation costs alone. I wanted to know how a neighborhood "stink" case could evolve into this public policy nightmare. In examining the litigation in this case study, I hoped to shed light on a problem with serious ramifications to the public purse and offer solutions to try and prevent it from happening again.

Questions to be Addressed

Simply put, how did a neighborhood "stink" case escalate into major litigation costing taxpayers millions of dollars? What caused a harmless neighborhood nuisance to grow into a public health hazard? What was the process of interaction between the parties; what were the consequences of their interactions; and, most importantly, what were the effects of the interactions among the neighborhood residents, their lawyers, the Sewerage and Water Board employees and the public lawyers?

How did the manifestations of hysteria, greed, and public entity vulnerability coalesce with such resounding implications? Were the odors that the neighbors complained of coming

from the East Bank Sewerage Treatment Plant at all or only from the Crescent Acres Landfill? When did the neighbors first smell the odors? Were the odors just a nuisance or a ramification of a more serious problem? Were the neighbors subjected to toxic emissions, and, if so, from what site did they originate? Were the neighbors truly ill or merely reacting hysterically to the allegations drummed up by the lawyers and their experts?

Were the lawyers altruistically motivated to exact compensation for their aggrieved clients, or were they inspired by the prospect of huge settlement sums? Who has funded the costs of this litigation? What were their motivations and how did each stand to profit? What effects did neighborhood hysteria, attorney greed, and public sector vulnerability have on the litigation progress? What impact did these effects have on the judge charged to hear the case, on the expert witnesses called to testify, and on the legal teams and their support staffs as they prepared for trial?

Purpose of the Case Study

The purpose of this study was to determine whether or not the plaintiffs' lawyers, originally retained to assist the neighborhood in their fight to close the landfill, became motivated by greed to take up the neighborhood fight and bring it to a more lucrative conclusion. By establishing trust, the lawyers were able to organize the neighborhood and generate public hysteria. The resulting litigation is a byproduct of greed and hysteria. This case study clearly illustrates the vulnerability of the public sector in protecting itself against such contrived litigation. It is, therefore, postulated that public sector vulnerability invites costly litigation from greedy lawyers looking for a big settlement. Unless changes to the system are made to protect public entities from such abuse, the concomitant consequences for John Q. Citizen and the public purse will be dire.

Scope and Limitations

This litigation is still ongoing after more than a decade. Consequently, the researcher is limited by matters of privilege as related to the case. Not all documents are available for public review while the case is in progress; some have been adjudicated in the courts as privileged matters.

The most potent limitation of this research is the reliability of the plaintiff claim form. In most cases, the claim forms were completed by members of the plaintiffs' attorneys' staff; some were notarized and some were not. The researcher did not interview the plaintiffs at any time; she relied on information supplied in the claim forms and in depositions. The researcher was not present during any plaintiff deposition nor was she present at the plaintiff's attorney's office at the time when any claim form was completed.

The researcher encountered other methodological difficulties. To my knowledge, no one has ever tried to put data collected for litigation against the Sewerage and Water Board of New Orleans into an empirical form. Access software made this possible for me to a limited degree, i.e., the researcher was limited by her knowledge and familiarity with the software, but it is possible for others to replicate this study and draw even more inferences from the data collected. Access enables queries of all kinds, and at some later date, more research can be conducted based on the data collection in this case study.

Another limitation of the study is the fact that it represents only one look at how outside counsel handles a public agency's defense. While this particular outside counsel was ever cognizant of cost expenditures, I feel certain that this may not be the case in other law firms hired as outside counsel. Although billing for each outside case is reviewed by the legal department of the Sewerage and Water Board before payment is rendered, without someone ever

present in outside counsel's offices, there really is no way of determining if hours billed were for actual hours spent on Sewerage and Water Board business.

Significance and Expectations of the Study

This research will contribute to our understanding of the concepts of greed and hysteria as they relate to and affect small communities and the provision of essential public services. Moreover, this case study will present much needed documentation to illustrate the serious ramifications faced by the public sector when it is confronted with well-financed litigation. It will suggest recommendations for legislative action and public policy initiatives designed to protect public service entities from the ravages of long, protracted, well-financed, and marginally legitimate litigation proceedings. It is not enough for defendant public service agencies to be exonerated of wrongdoing in a court of law. They must also be exonerated from the exorbitant costs of defense, especially when lawsuits fail to establish wrongdoing on their part.

I further hope to show that the data culled from the plaintiff claim forms and presented herein will support the theory that the hysteria of the plaintiffs was manipulated by the greed of the lawyers and that both, hysteria and greed, prompted the lawsuit and the millions of dollars of expenses that followed. The implications of this case study are of utmost important to public sector agencies that provide services to the public but there are also serious consequences to private enterprise as well.

CHAPTER II

LITERATURE REVIEW

A review of the literature associated with hysteria, the psychiatric disorder characterized by excitability, anxiety, and the simulation of organic disorders, provides the historical grounding necessary for the study of hysteria as it relates to the plaintiffs in this particular case study. The literature review lends credence to the theory that the physical manifestations of the neighborhood residents are socially and/or culturally determined.

Historical Evolution of Hysteria

To discuss the disciplinary and theoretical foundations for hysteria, one must first understand its historical evolution. The concept of hysteria is defined as a behavior that produces the appearance of disease although the patient is unconscious of the motives for feeling sick. A variety of disciplines have contributed to the study of hysteria. The historical context draws from the field of science and medicine; the medical studies have gynecological, neurological, psychiatric, and even humoral orientations. The social sciences have also added to the study of hysteria in fields as diverse as sociology, psychology, political science, and even economics.

The term “hysteria” is derived from the Greek word for uterus, *hysteria*, which in turn derives from the ancient Indian word for stomach or belly. Our earliest record of the disease dates back to an ancient Egyptian medical papyrus (circa 1900 B.C.) which documents a series of bizarre behavioral disturbances in adult women. The Egyptians theorized that the uterus was a free-floating, autonomous organism capable of traveling throughout a woman’s body. When the uterus moved too far upward in the body, it caused pressure on the diaphragm, resulting in a battery of peculiar physical and mental symptoms. Egyptian doctors concocted various methods for treating the disease. In some cases, fragrant or sweet-smelling substances were placed on the

vulva to lure the womb back down into the correct position; in other instances, women were coaxed into inhaling or swallowing fetid or foul-tasting substances to repel the uterus away from the upper parts of the body. The primary goal of treatment, however, was to return the womb to its correct position in the pelvic cavity.¹

The Greeks also adopted this notion of a migratory uterus and used it to formulate their medical and philosophical theories of hysteria. While ancient Egyptian text had only hinted at a causal link between hysteria and an unsatisfactory sexual life, Plato plainly expresses in the *Timaeus* the theory only implicit in Egyptian writings: “the womb is an animal which longs to generate children. When it remains barren too long after puberty, it is distressed and sorely disturbed, and straying about in the body and cutting off the passages of the breath, it impedes respiration and brings the sufferer into the extremist anguish and provokes all manner of disease besides.”

Similarly, fifth century B.C. writings from the school of Hippocrates reiterated that sexual deprivation caused a restless womb to travel upwards in the pelvic cavity. Dizzy spells, motor paralysees, sensory losses, and/or wild emotional outbursts were all ramifications of the womb’s quest for sexual satisfaction. It was common, therefore, for the ancient Greeks to order uterine fumigation or the application of tight pelvic bandages for the medicinal treatment of hysteria and the sexually deprived uterus. As one might expect, immediate marriage was also touted for its curative values. (p.19)²

Second century Roman physicians wrote about hysteria too. Aretaeus, the Cappadocian, theorized that “hysterical suffocation” was more prevalent in younger women than in older women precisely because “in those in whom the age, mode of life, and understanding is more

¹ Mark S. Micale, Approaching Hysteria (Princeton:Princeton University Press, 1995), 19.

² Ibid.

mild, the uterus also is of a wandering nature; but in those more advanced in life, the age, mode of living, understanding, and uterus are of a steady character.” (p.287)³

With the growth of anatomical knowledge, the ancient Roman physicians renounced the theory of the traveling womb but continued to associate hysteria exclusively with women and “diseases of the womb,” i.e., miscarriages, premature births, menopause. They identified hysteria with virgins, widows, and spinsters recommending heavy doses of marital sex.

The first great paradigm shift in the history of hysteria occurred during the fifth through thirteenth centuries. St. Augustine wrote during the period of Christian civilization in the Latin West that all human suffering, even organic and mental illnesses, were manifestations of some innate evil. Hysteria, with its shifting and highly dramatic symptoms, was seen as a sign of possession by the devil. Instead of calling for more sex to treat the disease, church leaders called for supernatural invocations, prayers, incantations, and even exorcisms.

During the late medieval and Renaissance period, hysteria was no longer diagnosed in hospitals or treated by the religious institutions; the locus instead shifted to the courtroom and the legal system; the witch-hunt had begun and the sensational trials and executions followed. Happily, by the end of the Renaissance period, the scientific revolution in England and Europe argued forcefully for the return of hysteria to the medical profession for treatment, thus signaling an end to religious condemnation and/or legal punishment.

Neurological Model of Hysteria

It was not until the 17th century when autopsies failed to reveal any uterine abnormalities that the neurological model of hysteria evolved. No longer was hysteria a condition of the womb or the soul; rather, it was viewed as a problem in the head. In 1696, Roman physician, Giorgio

³Philip R. Slavney, M.D., Perspectives on "Hysteria" (Baltimore: John Hopkins University, 1990), 14 citing

Baglivi, documented the most comprehensive case histories of hysterical patients to date and in so doing, for the first time, addressed the phenomenon of hysterical contagion. *De praxi medicina*, Baglivi's medical treatise, emphasized the profound influence of a doctor's words and actions on the hysteric and his clinical observations provided the catalyst for the emergence of the neurological model of the disease. Baglivi's treatise lends support to the present study because one is able to extrapolate the theory of hysterical contagion to the people under study in this litigation. Isn't it possible that the plaintiffs in this case study were so influenced by their neighbors thoughts and fears and their lawyers' words and deeds that they became part of a wave of hysteria, mistaking ordinary, everyday sinus problems and common colds for something far more serious?

Hysteria as Hypochondria

While the late eighteenth century and the early nineteenth century marked a return to the uterine theories of hysteria, no one school of thought prevailed in the study of hysteria's origins; instead, the theories of the time mirrored the physician's nationality and area of expertise. While some eighteenth century writers linked hysteria with sexual deprivation, other theorists blamed hysterical symptoms on sexual overindulgence. Franz Anton Mesmer initiated the use of hypnosis in the study of Parisian salon ladies in the 1780s inspiring much research into the unconscious mental processes, the psychogenesis of nervous and mental symptoms and the psychotherapeutic role of the doctor and the hysteric. Even the process of ovulation in women, discovered in the 1840s, inspired an ovarian theory of hysteria.⁴

In his comprehensive work, Robert Whytt, an eighteenth-century physician, documented over four pages of complaints associated with hysteria and hypochondria. He considered both

Aretaneus, The Extant Works of Aretaeus, the Cappadocian, (1856) 287.

disorders to be one and the same with manifestations in the gastrointestinal, genito-urinary, neuromuscular, pulmonary, and/or cardiovascular systems. Whytt described dramatic mood changes in these patients, noting that all were suffering from diseases that they did not, in fact, have. And he noted that the more he tried to convince the sufferers they were disease-free, the more agitated and angered they became.⁵ Whytt would encounter the same resistance from the plaintiffs in the instant case. No matter how much the Sewerage and Water Board and the Louisiana Department of Environmental Quality assured the St. Bernard residents that their fears of toxic fumes and hazardous chemical releases coming from the sewerage plant were unfounded, the more convinced the residents were to the contrary.

Because Dr. Whytt could not find a correlation between hysteria and any gross neuropathology, he postulated that both illnesses (hysteria and hypochondria) were the result of an “uncommon delicacy or unnatural sensibility of the nerves.” This delicacy or nerve sensibility explained why hysteria was more often found in women. Yet one fundamental cause did not explain why hysteria differed so much from case to case. Whytt hypothesized that some weakness found in organs other than those in the nervous system along with some extraneous force such as intestinal worms, an obstruction, or emotional trauma could account for the clinical diversity of hysteria.

It had long been established that emotional stimuli could produce physiological changes. Just as tears follow tragedy and shame precedes red faces, so too distressing sensory perceptions in vulnerable nervous systems could produce abnormal consequences. “It is to be observed that strong nervous symptoms are seldom occasioned by fear, terror, grief, the force of imagination,

⁴ Micale, 23.

⁵ Slavney, 24, citing Robert Whytt, Observations on the Nature, Causes and Cure of those Disorders which have been commonly called Nervous, Hypochondriac, or Hysteric, to which are prefixed some remarks on the Sympathy of the Nerves (Edinburgh: Becket & DuHondt, 1765) 101-102.

or any sudden impression on the organs of sense, in persons whose nerves are firm and less sensible but, when the contrary is the case, the causes above mentioned will often produce the most sudden and violent hysteric fits, or convulsive disorders.”⁶

By establishing a causal link between emotional distress and hysteria, it became clear to physicians of the day that hysteria resulted from abnormalities in the function of the nervous system rather than in its structure. Consensus was building toward a neural etiological model of hysteria, identifying neurological symptoms and signs with the illness.

Hysteria and the Lesion Theory

The modern medical history of hysteria begins with Jean-Martin Charcot, the “father of neurology” during the 1860s and 1870s. Dr. Charcot conducted pioneering research at the Salpêtrière, a large, historic hospital on the edge of Paris. He documented over 120 case histories of hysteria. Charcot theorized that hysteria was a dysfunction of the central nervous system caused by a lesion of some sort and manifesting itself primarily in motor and sensory abnormalities. Charcot’s lesion theory, while later proved erroneous, put an end to the general acceptance of the uterine etiology for hysteria and opened the door to the diagnosis of hysteria in men.⁷

Despite his brilliance, Charcot’s theories were flawed; there was no precipitating lesion. He wrongly emphasized the most complex forms of hysteria and oversimplified the disease descriptions to make them fit into his model. He was not really interested in his patients as people; he cared about them only as subjects, taking away their dignity and hope and pressing them into mass conformity, solitary confinement, or “circus acts” for his weekly lectures.

⁶ Slavney, 23, citing Whytt, 222.

⁷ Micale, 88.

By the time of Charcot's death in 1893, the paradigm shift in the etiology of hysteria was complete; physicians no longer approached hysteria from a gynecological, demonological, or neurological perspective. Instead, medical science began to investigate the psychogenic implications of Charcot's study of hysteria.

Hysteria as Depression

Pierre Janet, in his medical dissertation, *The Mental State of Hystericals* (1893), also used Charcot's work to illustrate that hysteria represented a mental malady, not with physical causes, but rather with physical ramifications. He posited that the amnesias, trances, convulsions, disturbances of sensation, movement, vision, and speech, as well as the multiple personality syndromes, etc. documented by Charcot and others before him in their case studies, were the result of emotional traumas that became "subconsciously fixed" on the hysteric's psyche. Janet meticulously documented his patient observations in detailed case studies, focusing attention on the altered states of consciousness exhibited by his patients rather than the physical symptoms they displayed.⁸

Janet believed that the "starting-point of hysteria is the same as that of most great neuroses, it is a *depression, an exhaustion of the higher functions of the encephalon.*"⁹ Janet posited that hysteria produced a withdrawal from consciousness; functions, such as memory, sensation, and movement, normally under the control of an integrated personality became disassociated, operating independently. Hysteria, for Janet, was psychophysiological. Whether the vulnerability of the nervous system was inherited or acquired was inconsequential; hysterical attacks were always precipitated by emotion and the power of suggestion. According to Janet, the physiological function affected was directly determined by suggestion, previous damage to or

⁸ Micale, 26.

specific weakness of the functioning system; and the occurrence of strong emotion at the time the function was in progress.¹⁰ Janet, however, had observed no malfunction of the nervous system to account for the symptoms and signs of hysteria; consequently, he lacked the confirming evidence needed to give credence to his theory of the etiology of hysteria.

Janet was not able to find the "microbe of hysteria" but his theories on the power of suggestion were on target. Would not Janet have raised the issue of the power of suggestion in the St. Bernard neighborhood? The proximity of the sewerage treatment plant was enough for the lawyers and neighbors to conclude that their real or imagined illnesses were attributable to the treatment plant, just because it was located in the area. The power of suggestion is a real factor in this litigation. Compensation from the Sewerage and Water Board is sought for every runny nose, chronic cough, and spoiled bar-b-que plans. The grievances run the gamete, as any litigation fraught with emotion usually does, but to attribute so many inane symptoms to the sewerage treatment plant simply defies logic when there were so many other reasonable explanations.

Hysteria as a Psychological Disease

Following Janet, the search for the "broken part" in the nervous system was taken up by Sigmund Freud. Trained in neurological medicine, Sigmund Freud, too, studied at the Saplêtrière in 1885 and 1886 and it was his encounter with Charcot that charted the course of his intellectual and professional life. After moving to Vienna, Freud learned of local internist, Dr. Josef Breuer's work with hysterical patients. Breuer had been making progress in the treatment of his patient, "Anna O" and her story intrigued the young Freud. The story of "Anna O" is well documented in

⁹ Ibid.

¹⁰ Slavney,25.

Studies on Hysteria (1895) a collaborative effort by Breuer and Freud, making her the single most famous patient in the history of the study of hysteria.¹¹

Anna O. exhibited a multitude of idiosyncratic symptoms of hysteria. While under hypnosis, she was able to trace her symptoms back to the emotionally disturbing events that precipitated them. Later, in talks with Dr. Breuer, Anna O. was able to recall the disturbing events, talk about them on a conscious level, and rid herself forever of the bizarre symptoms she had been experiencing; the symptoms never returned.

Breuer and his patients helped Sigmund Freud reconceptualize hysteria as a psychological disease with quasi-physical symptoms. Freud posited that all hysteria, whether male or female, had traumatic, oftentimes, sexual origins. He hypothesized that those patients unable to cope with their unpleasant experiences on a conscious level summoned all their emotional energy to repress the repulsive memories. Freud's theory of hysterical conversion, i.e., the conversion of all of that negative emotional energy into somatic manifestations of hysteria, was the result of the body giving unconscious expression to these repressed memories. The physical expressions of the repressed memories were by no means arbitrary and meaningless. Rather, Freud believed the expressions were the complex symbolizations of the patient's inhibited experiences.¹²

Freud's psychoanalytic model represents the second resexualization of hysteria, this time with the sexual appearing as an integrated psychosexual model rather than the genital or reproduction based biological model of the past. Freud's view of hysteria as a function of the psyche meant the disorder was now open to new methods of treatment and therapy. He theorized

¹¹ Micale, 27.

¹² Micale, 28.

that once the patient was able to bring repressed memories into the conscious state, the hysterical symptoms disappeared.

During the 1880s and 1890s, Freud experimented with various forms of therapeutic treatment: medical electricity, hypnosis, and the templar pressure technique, but it was his “free association” technique that he considered the most promising.¹³ The free-associative technique called for the psychoanalyst’s attentive listening to the rambling thoughts of the patient; supposedly, the random thoughts revealed the troubled psyche to the analyst. Such intense and individualized treatment no doubt forged a tremendous bond between doctor and patient.

Most assuredly, psychoanalysis has dominated the history of hysteria in the first half of the twentieth century. But, the most consequential development in the history of hysteria in this century has been the dramatic, if not, mysterious decline in the incidence of the disorder. The literature is continuous from the ancient Greeks to Freud but after twenty centuries of medical history, the word “hysteria” has all but disappeared from official diagnostic usage; those cases that have been documented in the recent past are much simpler and less flamboyant than their counterparts in centuries past.

The evolution of hysteria as a disease is remarkable because of its social, psychological, economic, political, religious, and gender based origins. Perhaps it no longer occupies center stage in the medical literature because of our times, the sociosexual emancipation of women, or our psychological literacy. After all, the rise of modern feminism makes it all but impossible to continue to characterize hysteria as a female reaction to sexual repression and limited opportunities. And now that the psychological and sociological fields have been feminized, the therapist’s role has changed too. The old style authoritarian shrink modeled after the stern Dr. Charcot or the bullying style of Sigmund Freud to illicit repressed experiences have given way to

the softer, more approachable style of the female therapist whose role is supportive, never challenging the veracity or historical reality of the patient's narratives.

Shorter and the Mechanism of Hysterical Conversion

Edward Shorter, a modern European social historian with medical training, focused attention on the mechanism of hysterical conversion. He studied German, French, English, and American medical journals and concluded that, throughout history, hysterical patients have always expressed their emotional anxieties through physical afflictions. While the frequency of these physical symptoms remained constant over time and across cultures, Shorter recognized that the specific bodily signs or syndromes expressed were actually socially and/or culturally determined.

Shorter documented in "Paralysis: The Rise and Fall of a 'Hysterical' Symptom," the wide ranging physical, social, and cultural manifestations of hysteria through the decades. Shorter noted that eighteenth century women were more subject to swooning or convulsive fits than their nineteenth century upper and middle class female counterparts who took to their bedrooms, expecting to be waited on hand and foot by family, friends, servants, and doctors. After 1900, there were no "couch" ladies; they disappeared mysteriously from the culture of the times.¹⁴

In today's society, young ladies no longer faint, swoon, or take to their beds. Rarely, do we see ticks, convulsive movements, or young women paralyzed in hypnotic stares; instead, a good number of today's adolescent or young adult women suffer from psychogenic eating disorders, like anorexia and bulimia.¹⁵ Shorter's study, *From Paralysis to Fatigue: A History of*

¹³ Ibid.

¹⁴ Edward Shorter, "Paralysis: The Rise and Fall of a 'Hysterical' Symptom," Journal of Social History 19 (Summer 1986): 549.

¹⁵ Ibid., 564.

Psychosomatic Illness in the Modern Era, (1992) posits that patients continually changed the physiological manifestations of hysteria to conform to the paradigm of the times.

Hysterical tics, paralysis, fainting spells, etc. of hundreds of years ago, and, even the fatigue syndromes of today, Shorter contends, are the result of behavior inculcation by doctors, internalized unconsciously by their patients.¹⁶ If Shorter's premise is correct, then we should be able to determine and/or predict, with specificity, what symptoms will be manifested by the hysteric once the social, cultural, economic, and political framework of his/her environment is known.

Shorter's work is significant because it explores the social and cultural links to hysteria over time. It is significant to this study because of the medical claims made by the residents of the St. Bernard neighborhood. Red eyes, runny noses, coughs, hay fever, sneezing are common ailments affecting most of the residents of the area, not just those living near the treatment plant. There is nothing unusual about any of these symptoms. Southeast Louisiana residents fill the offices of eye, ear, nose, and throat doctors throughout the region with the very same complaints and most do not live anywhere near a sewerage treatment plant. The social and cultural links of these commonplace symptoms have morphed into a mass hysteria where the residents of this St. Bernard neighborhood now fear poor quality of life, lower property values, poor health, and in extreme cases, life-threatening diseases and even death.

Hysteria and the Caste System

The early modern theorists have also suggested a correlation between the caste system and the diagnosis and treatment of hysteria as a disease. Although very little was written through the ages about the interrelationship of class identity to the syndrome, most early practitioners of

¹⁶ Edward Shorter, *From Paralysis to Fatigue: A History of Psychosomatic Illness in the Modern Era* (New York:

the day believed that hysteria was a malady affecting predominately the middle and upper classes of society. Robert Burton, in his 1621 *Anatomy of Melancholy*, observed that when women were kept hard at work they were not troubled with such afflictions of the body. He suggested that the “noble virgins” and “nice gentlewomen” of the day were prone to hysterical fits because of their lives of leisure and ease. Rarely, were the hired servant, poor handmaiden, or country wench so misaffected; they simply had too much work to do.¹⁷ Even Freud’s case studies of wealthy bourgeoisie patients suggested that hysteria was an affliction of the affluent. It is no surprise, therefore, that the early modern medical literature went so far as to prescribe manual labor for its curative value.

The new hysteria studies, however, point to the widespread existence of hysteria among working class women. Edward Shorter, for example, in his “Rise and Fall of a ‘Hysterical’ Symptom” posits that the discrepancy in the social interpretation of the disease and the actual demographics of the disorder calls into question the accuracy of early sociological studies. Shorter contends that early scholars relied heavily upon the diaries of middle and upper class women and the writings of “society nerve doctors” to formulate their theory that hysteria was a malady of the upper classes. Once the case studies from hospitals and physicians with a socially diverse practice were analyzed, it became clear that working class women were just as prone to hysterical symptoms as their upper and middle class counterparts.¹⁸ Unfortunately, as with other diseases of the body, hysteria among the lower classes went, for the most part, undiagnosed, untreated, and unreported before the nineteenth century.

Free Press, 1992), chapter 1.

¹⁷ Micale, 155, citing Robert Burton, *The Anatomy of Melancholy*, ed. Holbrook Jackson part 1 (New York: Vintage, 1977), 417.

¹⁸ Shorter, “Rise and Fall of Hysterical Symptom,” 572.

Hysteria in a Political Framework

The modern literature of the last century analyzes hysteria within a political framework. From this perspective, hysteria becomes the pathology of powerlessness; its symptoms, a form of social protest against gender roles. Stymied by their lack of education, nineteenth century women were socially, economically, and politically subservient to men and did not have the where-with-all to adequately express their defiance. Elaine Showalter, in her 1997 book, Hystories: Hysterical Epidemics and Modern Media, suggested that the lack of a public voice to rally their masses left nineteenth century women with no alternative but to articulate their economic and sexual oppression through their somatic symptoms. Paralysis, mutism, self-starvation, and spasmodic seizures all became bodily metaphors for the immobility, silence, denial of appetite, and hyper-femininity forced upon them by society.¹⁹

Hysteria in Men

Another relevant discovery in the new hysteria studies is the prevalence of hysteria in men over the centuries. Elaine Showalter, for instance, contends that male hysteria had been clinically diagnosed as early as the seventeenth century.²⁰ Why, then, do we not see evidence of the existence of hysteria in men over the centuries? What accounts for this cultural denial of hysteria in men? Perhaps it is rooted in the very genesis of the disease. After all, with no roaming uterus, there could be no male hysteria, right? Physicians actually convinced themselves that what they were seeing in men was some other phenomena. Over the years, doctors treated their male patients for hypochondria, neurasthenia, shell shock, post traumatic stress disorders, etc., anything but hysteria, because to diagnose a man with hysteria was to label him unmanly,

¹⁹ Elaine Showalter, Hystories: Hysterical Epidemics and Modern Culture (New York: Columbia University Press, 1997) 54-55.

²⁰ Ibid. 64.

effeminate, or, worse yet, homosexual, a diagnosis too difficult to make and, surely, too difficult for the patient to accept.

It is interesting to study male hysteria within the context of three historical settings. In each case, and within each historical domain, doctors diagnosed and treated three separate and distinct neuroses: 1) the neurasthenic male of the Victorian age; 2) the male hysteric of late nineteenth century France; and, 3) the battle soldier hysteric of the war era. An analysis of each offers valuable insight in the study of hysteria in men.

Janet Oppenheim, in her book Shattered Nerves, examined the Victorian neurasthenic male against the backdrop of changing attitudes toward masculinity and the outward expression of male emotion.²¹ Historically, during the age of Enlightenment, for example, and also during the Romantic eras, men had been encouraged, even praised, for public and private displays of strong emotions. The social, cultural, and even moral changes of the Victorian era, consequently, wrecked havoc on the male's ability to express outward emotion. After all, a society that valued self control and self discipline could no longer tolerate male emotionalism. Nineteenth century doctors theorized that this bottled up energy, frustration, and anxiety manifested itself in a variety of male nervous disorders.

First identified as "American nervousness", neurasthenia, a chronic fatigue syndrome, was first diagnosed by American neurologist, George M. Beard, in the 1870s. Beard postulated that life in the fast lane had caused educated professionals, both male and female, to experience tremendous mental and physical fatigue, but conceded that nineteenth century physicians were unable to determine the organic causes of the fatigue.²²

²¹ Janet Oppenheim, "Shattered Nerves": Doctors, Patients, and Depression in Victorian England (New York: Oxford University Press, 1991), chapter 5.

²² Showalter, 50.

Neurasthenia as a disease became the hysteria of the elite by the turn of the century, and while diagnosed in both men and women, neurasthenia, just like hysteria, was defined and treated differently in the sexes. Doctors still considered female neurasthenia a result of reproductive problems, intellectual strain, emotional trauma, or exhaustion and ordered total sequestration and bed rest as a treatment. No matter what its underlying causes, however, most neurasthenic women rebounded quite quickly, for surely the treatment was worse than the symptoms.

Unlike the medical professionals of the day who believed that male neurasthenia was a result of excessive work and anxiety, Janet Oppenheim's recent work analyzes male neurasthenia in the context of societal change during the nineteenth century. She points to an ethos of aggressive capitalism, strong nationalism and imperialism, social Darwinism, an Evangelical religious climate, and an emerging sports culture; each significantly impacted not only nineteenth century culture but the male psyche as well. Oppenheim observed that the majority of men who experienced "shattered nerves" were young adults and argued convincingly that the causal factors behind the male neurasthenia syndrome were cultural, not intrinsically organic. Men experienced traumatic stress just as women did; but the precipitating causes of the societal stress were quite different. Oppenheim noted that career indecisiveness, loss of religious faith, struggles with male authoritarian figures and sexual and emotional repression were all conflicts that drained men of their *joie de vivre*, plunging them into the despairs and fatigue associated with neurasthenia.²³

²³ Oppenheim, chapter 5.

Hysteria in a Cultural Framework

Mark Micale's 1995 work, Approaching Hysteria, is important to this study of hysteria because of its survey of the cultural history of the disorder throughout time and in various locales. Micale formulated a systematic and comprehensive analysis of masculine hysteria by examining in great detail a second historical setting for the male variant of hysteria: nineteenth century France. He examined the work of Briquet, at the Hôpital de la Charité in Paris, Charcot, at the *Salpêtrière*, and the early work of Sigmund Freud.

Although French physician, Pierre Briquet's career was devoted to the study of infectious diseases, he did publish an important treatise (800 pages) on the study of hysteria. *Traité de l'hystérie clinique et thérapeutique* was widely accepted by his Parisian contemporaries, especially Charcot, but over the years fell by the wayside, eclipsed by the advent of modern psychoanalysis. Recent studies of hysteria in America, however, have resurrected interest in Briquet's work, with an effort by doctors at Washington Medical School in St. Louis, Missouri to systematize a clinical definition of hysteria under the less pejorative label of "Briquet's syndrome."²⁴

Briquet's treatise is significant because of its value to the modern clinical study of hysteria. Rich in epidemiological research, the "traité" is characterized by extensive quantitative studies that reject the historical association of hysteria to the female reproductive system. In fact, the "traité" begins with the study of seven cases of male hysteria because Briquet insisted that hysteria was a "neurosis of the brain" caused by the interaction of many diverse factors.

Briquet contended that age, gender, emotional disposition, previous physical illness, family history, psychological stress, even mode of education all influenced the affected

²⁴ Slavney, 35-40.

personality. He postulated that traumatic events such as the death of a loved one, spousal abuse, or even anxiety over the health of a child could trigger a hysterical crisis in both men and women and that the symptoms of hysteria could affect almost any organ of the body.²⁵ By dismissing the widely accepted premise of the sexual etiology of the disease, Briquet became a pioneer in the study of twentieth century epidemiological and cross cultural psychiatry. His case work in the study of hysteria is well documented and his extensive quantitative studies offer today's social scientist a medical methodology and worldview never before available.

Like Briquet's work before him, Charcot's work at the *Salpêtrière*, from 1878 to 1893, documented and published over sixty case histories of hysteria in men. These men were working class men, predominately, factory workers, not the stereotypical effeminate or homosexual man, the celibate priest, the privileged aristocrat, or the pubescent boy.²⁶

Whatever its origins, Charcot concluded that male and female hysteria were virtually the same. He noted no particular difference in the physical expression of the disease. Both sexes, for instance, were subject to athletic contortions, seizures, epileptic-like fits, etc., although the male versions of these fits appeared on a grander scale, more athletic, more violent, just because of the male strength involved. Charcot, however, noticed and documented the difference in the male and female emotional patterns generated by the disease. Women's symptoms, for example, like crying, were, oftentimes, mobile and fleeting, with only intermittent dramatic outbursts; men, on the other hand, appeared much more depressed, melancholic, and somber, although they rarely, if ever, cried.

Finally, the genderization of hysteria begun with Briquet at the beginning of the nineteenth century ends with Freud at the end of the nineteenth century. The evolution of the

²⁵ Micale, 52.

psychoanalytic method is a direct result of Freud's work with hysterics. No other neuroses or psychoses elicited such a strong doctor-patient relationship, a relationship whose very treatment was built upon the persuasiveness of the doctor to evoke either real or fantasized narratives of repressed sexual abuse. Today's social scientists, while deploring Freud's ruthless methods, must still acknowledge that it was his work with hysterics that led him to what is universal in psychic construction.

Finally, it is important that this study analyze male hysteria as it appears in its modern day civilian settings, particularly, in the context of wartime nervous disorders. Dr. Charles S. Myers, an English military doctor during the first World War, noticed that returning soldiers were suffering from such emotional distress that they experienced incapacitating headaches, limps, partial paralysis, loss of voice, insomnia, and even amnesia. Unwilling to characterize these hysterical symptoms as such, he coined the term "shell shock" suggesting that the soldier's symptoms were caused by their close proximity to the physical and chemical effects of exploding shells. What was particularly interesting about "shell shock," however, was not only that the war neuroses increased after the war but that some of its victims had never actually been under fire in the first place.

Elaine Showalter, in her book *The Female Malady*, addressed the issue of male hysteria in post World War I society and offered an interesting social and psychological analogy between middle class Victorian women and the front line soldiers of World War I. She intimated that both felt trapped by a closed and intolerable social and psychological world beyond their control. Just as the uneducated Victorian woman was ill-equipped to appropriately express her frustrations, so too the Edwardian male was stifled by a cult of manliness that required a stiff upper lip under all

²⁶ Micale, 164, citing Jean-Martin Charcot, *À propos de six cas d'hystérie chez l'homme*, (Paris: Théraplix, 1969) 409.

circumstances, even war. The soldier's psychosomatic symptoms represented not just a protest against the ravages of war but also a deep resentment for the society that had placed him in harms way in the first place.²⁷

The residents of the St. Bernard neighborhood, male and female alike, experienced these same feelings of powerlessness in their dealings with the Sewerage and Water Board and Browning Ferris Industries. Frustrated by the sights, sounds, and smells in their neighborhood, and unable to resolve the frustrations of their day to day existence, they welcomed the overtures of the lawyers and town hall meetings to vent their frustrations. United as a neighborhood, their psychosomatic symptoms were internalized and their protests escalated to the level of litigation.

F. G. Gosling and Joyce M. Ray, in their 1986 article in the *Journal of Social History* elegantly propose that the diagnosis of hysteria from the upper and middle classes to the lower classes and from the female gender to the male gender is symbolic of "the democratization of American nervousness."²⁸ This democratization of nervousness represents not just a process of downward social progression, wherein working class people experience a sort of psychological gentrification that mimics the psychological illnesses of their social superiors. No, this democratization of nervousness also encompasses a "gender by class" modality, comparatively analyzing how men and women from middle and lower class backgrounds are diagnosed with hysteria. It is the integration of both of these factors, gender and class, that account for the "democratization" of hysteria.

In any event, today's social scientists must come to terms with the recent discovery of the high incidence of hysteria in the lower classes and also among men. What accounts for the

²⁷ Elaine Showalter, The Female Malady: Women, Madness, and English Culture, 1830-1980 (New York: Pantheon, 1985) 172.

²⁸ F. G. Gosling & Joyce M. Ray, "The Right to be Sick:" American Physicians and Nervous Patients, 1885-1910," Journal of Social History 20 (Winter 1986): 253.

discrepancies in diagnosing the disease along class and gender lines and how could the medical literature fail to address these issues for over three hundred years? Certainly a re-evaluation of the earlier medical literature is necessary to determine if a genuine evolution occurred in the social epidemiology of the disease or was it simply a matter of more skilled professionals, more modern institutions, or better diagnostic tools to properly identify the disease. The latter explanation is the more plausible.

For a re-evaluation of the literature to be credible, social scientists must thoroughly examine and review all of the case studies in the medical literature to determine what effects the elements of class, age, gender, culture, religious affiliation and ethnic background had on the diagnosis of the disease. How did these easily identifiable characteristics influence not just the patient's susceptibility to the disease but his treating physician's ability or inability to properly diagnose and treat the disease?

The Diminution of Hysteria in the Clinical Literature

Finally, after studying the history of hysteria, from its earliest beginnings thousands of years ago, one marvels that, with few exceptions, today's physicians and psychiatrists have written very little about hysteria in our own century. Mark Micale, a Yale professor, offers two theories for the diminution of hysteria in the clinical literature: 1) sociosexual emancipation; and) 2) psychological literacy.²⁹

Freud theorized that the sexual repression, emotional suppression, and social suffocation of the Victorian era were the psychological and social factors that created neurasthenic men and hysterical women. The de-Victorianization of these restraining social customs and mores resulted

²⁹Micale, p. 171.

in the passing of those conditions that generated the nervous conditions in the first place. In this respect, hysteria is viewed as a culture-bound pathology.

Another explanation for the diminishment of hysteria as a medical phenomenon is the growing literacy of not only twentieth century social scientists but also the general public in the psychological processes. There is no doubt that people in today's society are more psychologically savvy, more educated on the nature and operations of the psyche. Most laymen are familiar with modern psychological lingo. They have either heard, read about, or know people who have experienced psychosomatic stress disorder, post traumatic stress disorder, chronic fatigue syndrome, multiple personality disorders, etc.

Widespread access to newspapers, radio, television, and movies has not only educated today's people about the human psyche; it has also, unfortunately, made them first-hand witnesses to psychological perversions and atrocities never before imagined. Consequently, most scholars conclude that hysteria today is virtually non-existent in the modern, medicalized, industrialized, western world where people are better able to, and often encouraged to express their frustrations openly. Hence, the hysteria of old could only exist in rural, lower-class, third-world populations.³⁰

Author and Princeton English Professor, Elaine Showalter's contributions to the postmodernist study of hysteria are relevant to the present study. Showalter has even coined the word "hystories" to describe the culturally oriented, hysterical narratives that describe present day hysterics. In this age of mass communication, Showalter's "hystories" present creditable evidence of the role of both medicine and the media in constructing and distorting the symptoms and stories of the modern hysteric. She posits that Chronic Fatigue Syndrome, the Gulf War

³⁰ Paul Chodoff, "A Re-Examination of Some Aspects of Conversion Hysteria", Psychiatry 17 (1954): 75-81.

Syndrome, recovered memories from long ago sexual abuse, satanic ritual abuse, and even multiple personality disorders are diseases with no convincing medical or external explanations.

Showalter may have gone too far with some of her conclusions. After all, there may be some medical basis for Chronic Fatigue Syndrome and the Gulf War Syndrome. More study is needed before we characterize returning war heroes, suffering from this syndrome, as hysterics. It would not be politically correct, that is certain, nor would it be socially acceptable either, to suggest that syndrome sufferers were not really sick. Physical ailments with unconventional complex causes are not entirely out of the realm of possibility for returning soldiers, especially when doctors and diagnosticians do not know what toxins the soldiers were exposed to while they were on foreign soils.

Showalter is convinced that hysteria is not disappearing from the modern medical and psychiatric literature at all? I agree wholeheartedly. What is lacking in the modern literature review is a clear definition of hysteria, a definition that will satisfy a multi-disciplinary approach to its study. Hysteria is not disappearing from our world; it is just called by different names in different disciplines. In 103 articles published on the subject since 1972, there have been 30 different terms used to describe the affliction.³¹ Acceptable terminology must be identified and be consistently used by all disciplines if we are to fully understand the complex nature of hysteria.

Mass Psychogenic Epidemics of the 1990s

The mass psychogenic epidemics of the 1990s, for example, are indicative of the return of hysteria to the general populace. 24-hour radio, 24-hour cable news programs, 24-hour access to the internet, newspapers, tabloids, magazines, and movies bombard us round the clock with all

³¹ Leslie P. Boss, "Epidemic Hysteria: A Review of the Literature," *Epidemiologic Reviews* 19, No. 2 (1997) 240.

manner of health risks and illness-inducing contaminants. These stories, and the sound bites advertising these stories, are meant to induce us to stay tuned to keep abreast of the latest health crisis lest we put ourselves and/or our families at risk. The scare tactics are necessary to ensure a captive audience, and a captive audience generates ratings and economic profit for the media and for its sponsors.

While I do concur with Showalter that some hysteria is contrived for a variety of reasons, I must also credit her for correctly alerting the public to the illnesses brought on by strong emotions and psychological stresses. I would think that Showalter would agree with me once I presented the residents' claims of illnesses to her in this case study and credit the lawyers and the neighborhood leaders with spreading a hysterical epidemic.

In a 1997 article published in *Epidemiologic Reviews*, Leslie P. Boss examines the concepts of epidemic hysteria, mass hysteria, mass psychogenic illness, and mass sociogenic illness and characterizes the aforementioned as one and the same illness: an illness defined as "a constellation of symptoms suggestive of organic illness, but without an identifiable cause." Epidemic hysteria is viewed as a social phenomenon occurring between two or more otherwise healthy people who share common beliefs related to the symptoms.

Boss posits that mass hysteria is a culture-bound stress reaction characterized by two separate variants: an anxiety variant and a motor variant. Abdominal pain, dizziness, fainting, headache, nausea, and hyperventilation are all indicative of the anxiety variant of mass hysteria; convulsions, laughing, hysterical dancing, and pseudoseizures are common motor variants. Although there are documented cases of the motor variant in Western culture, it is far too

primitive to be socially acceptable; consequently, the anxiety variant is much more pervasive in Western society.³²

A review of the literature on mass hysteria and mass psychogenic illness suggests that mass hysteria is triggered by some environmental event, resulting in a significant emergency response, and a belief by those who become ill that the environmental event was the cause of their illness or anxiety.

What is significant about Boss' work is that he reviewed the reported outbreaks of epidemic hysteria in the literature from 1973-1993 and compared it to the work done by François Sirois in his study of mass hysteria outbreaks from 1872 through 1972. The tables presented in Boss' study offer definitive proof of the historical evolution of the disease from diagnosis to triggering factors to socio-cultural manifestations of its symptoms.³³

In reviewing the literature over a period of 101 years, Sirois was able to identify 78 distinct outbreaks of epidemic hysteria. Boss identified almost that many, 70, in the twenty years immediately following the Sirois study. In Table 1, it is interesting to compare the location of the reported outbreaks over the years. While the locations of the epidemics were quite similar, usually in schools and small towns, it is interesting to note the rise in the number of reported outbreaks in factories as the years progressed. The cause of this spike in factory related outbreaks is not clear, however. Perhaps it was a result of the increased reporting of outbreaks; perhaps it was a result of more investigations in the workplace. Or perhaps, it was a result of more workers being able to collect sick leave. This last reason would explain Table 2. Boss posits, however, that the increase in outbreaks and sick people is the result of an increased population and the

³² Boss, p. 233.

³³ Ibid.

increased likelihood of women working outside the home. I think the sick leave explanation is the more plausible, especially after Table 3 is reviewed.

Table 1. Location of Reported Outbreaks of Epidemic Hysteria

Location	1872-1972		1873-1893	
	No.	%	No.	%
Schools	34	49	35	50
Towns/Villages	17	24	7	10
Family group	*		3	4
Factories	8	11	20	29†
Institutions	4	6	3	4
Hospitals	3	4		
Other	3	4	2	3‡
Unknown	1	1		

* Not a category in the Sirois (9) report.

† Includes office buildings.

‡ Train station, birthday party.

Table 2. Number of Ill People in Reported Outbreaks of Epidemic Hysteria

No. ill	1872-1972		1873-1893	
	No.	%	No.	%
<10	22	33	7	10
10-30	25	37	13	19
>30	19	28	44	63
Unknown	1	1	6	9

Table 3. Sex of People Ill in Reported Outbreaks of Epidemic Hysteria

Sex	1872-1972		1873-1893	
	No.	%	No.	%
Female	58	83	10	14
Male and female	8	11	52	74
Male	3	4	1	1
Unknown	1	1	6	10

Another significant finding of Boss' comparative study is the fact that epidemic hysteria can usually be traced back to a precipitating case. Boss labels the precipitating case, the "index" case, and he suggests that it is from the index case that the contagious illness spreads. (Table 4) Boss' study also examines the "triggering" effect of epidemic contagion, determining that in most

cases during his twenty year study, the "trigger" was some environmental event: a nuclear release or environmental concerns over food, air, or water quality. (Table 5)

Table 4. Index Case Identified in Reported Outbreaks of Epidemic Hysteria

Index Identified	1972-1972		1973-1983	
	No.	%	No.	%
Yes	36	51	40	57
No	15	21	17	24
Unknown	19	27	13	19

Table 5. Triggering Factors in Reported Outbreaks of Epidemic Hysteria

Triggering factor	1972-1972		1973-1983	
	No.	%	No.	%
Events	32	46	38	54
Rumors	6	9	8	11
Events and rumors	2	3	1	1
Not defined	30	43	23	33

Another likely trigger was the exaggerated or imaginary fears associated with any mysterious odor. Most environmentally triggered hysteria outbreaks were characterized by rapid onset and recovery and were typified by anxiety variant symptoms and behaviors. What is noteworthy for this case study is the role that rumor played in the spread of the contagion. K. T. Goh's 1987 epidemiological study of an illness outbreak of school children further bolsters this premise. Goh concluded that those students who were aware of a pre-existing rumor about a noxious gas that had infiltrated their school were more likely to get sick when they smelled an unusual odor than those students who knew nothing about the gas rumor. Goh determined that those who accepted the rumor as fact succumbed to illness while those who were indifferent to

the rumor did not get sick.³⁴ The literature is replete with this "mind over matter" pre-disposition to illness.

Boss maintains that the contagion of the epidemic is affected by the behavior performance of socially related people. Once the symptoms of an illness are experienced or become evident to members of a socially related group, it is more likely and more acceptable for others in the group to experience many of the same symptoms. Even the types of symptoms manifested suggest a socially acceptable dimension. Table 6 strongly supports such a theory. The subjects in Sirois' study displayed more motor variant symptoms, more convulsions, more abnormal movements and fainting as compared to the anxiety driven symptoms like headaches and nausea exhibited by Boss' subjects from 1973-1993.

Table 6. Number and Percent of All Studies of Epidemic Hysteria Reporting Specific Symptoms of Those Ill

1872-1972			1973-1993		
Symptoms	No.	%	Symptoms	No.	%
Convulsions	19	27	Nausea, vomiting	37	56
Abnormal movements	14	20	Headache	36	55
Fainting	9	13	Dizzy, lightheadedness	34	52
Globus, cough, laryngismus	9	13	Abdominal distress	24	36
Paresthesia, anesthesia	9	13	Weakness, fatigue	22	33
Tremor	8	11	Fainting, unconsciousness	21	32
Headache	7	10	Hyperventilation, short breath	19	29
False beliefs	7	10	Anxiety, fright	14	21
Nausea, vomiting, abdominal malaise	6	9	Screaming, violence	10	15
Hyperventilation	6	9	Tight chest/cough	9	14
Spasmodic laughing	6	9	Twitching, seizures	8	12
Cries	6	9	Tingling, numbness, paralysis	7	11
Agitation	4	6	Giddiness, laughter	7	11
Dizziness, nervousness	3	4	Hot, cold	7	11
Paralysis	3	4	Confusion, trance, aimless walking/running	6	9
Depression	1	1	Rash	6	9

* Percent of all outbreaks with symptoms reported.

Since the early 1980s there has been a recurrence of documented cases of mass hysteria. During March and April of 1983, for example, close to 1000 residents of the Jordan West Bank suffered from various psychogenic symptoms amid rumors that the Jews would use poison gas in

³⁴ K. T. Goh, "Epidemiological Enquiries into a School Outbreak of an Unusual Illness." International Journal of

their conflict with the Palestinians. Once tests revealed that no gassings had occurred, the headaches, nausea, fainting, dizziness, and abdominal pain quickly subsided.³⁵ Another incident of mass hysteria was reported in 1989 in Soviet Georgia during a period when it was rumored that Russian officials had used chloropicrin, a chemical agent, to quell an opposition rally. Close to 400 female students, from nearby schools, suffered anxiety reactions once the media confirmed that the poison gas had been used to disperse the crowd. The rumors that the students were gassed were enough to trigger anxiety reactions that resembled poison gas symptoms, burning eyes, skin irritation, dry throat, and stomach ache. In both of these cases, the intense media coverage of the events was instrumental in spreading the contagion to the larger community.³⁶

Being in close physical and visual proximity to sick people enhances the likelihood of the contagion factor. Neither the Serbs nor the Israelis used poison gas but because of the nature of the conflicts, the threat was indeed real. Any threat based in reality heightens a sense of alertness and anxiety in any community, enough to allow mass sociogenic illness to flourish. Compound this with the excitement produced by emergency response, media presence and their investigative efforts, and the ambulance chasing lawyers who are attracted to any environmental scene, and epidemic contagion becomes all the more plausible.

Dr. Arthur J. Barsky and Dr. Jonathan F. Borus explore the concept of functional somatic syndromes in their 1999 article in the *Annals of Internal Medicine*. They suggest that patients with functional somatic syndromes usually self-diagnose themselves and, in so doing, attribute their ordinary common ailments to a more serious and catastrophic disease. These patients usually resist any diagnosis from any health professional in contradiction to their own and,

Epidemiology, 16 (1987) 269.

³⁵ Boss, 240.

consequently, devalue any physician opinion or epidemiological study that conflicts with their own strongly held beliefs. Sensationalized media coverage, the mobilization of parties with a vested self interest in the situation at hand, and the prospects of litigation and compensation only serve to spread the hysteria and exacerbate the distress and anxiety of the syndrome sufferers.³⁷

Indicators of Hysteria

The doctors, Barsky and Borus, premise that the symptoms of the functional somatic syndromes, while similar in nature, share two important characteristics: 1) they are diffuse, nonspecific, and ambiguous; and, 2) they are prevalent in the healthy, non-patient populations.³⁸ The symptoms include: fatigue, weakness, sleep disturbances, headache, muscle and joint ailments, nausea, "racing heart" shortness of breath, sore throat, dizziness, and dry mouth, and this list is not exhaustive. All of these common symptoms are found in the general population of perfectly healthy individuals.

Barsky and Borus document and confirm my suppositions regarding the St. Bernard residents involved in this litigation. All of the residents of the neighborhood, plaintiffs and non-plaintiffs alike, experienced headaches, dry mouth, sore throat, blood shot eyes. These are not unusual occurrences. They are common ailments present in any neighborhood general population. Statistics confirm that almost 90% of the general population experience one somatic symptom in a 2-4 week period; and, the typical adult will report a symptom every 4-6 days.³⁹

Barsky and Borus explore the epidemiological similarities of the functional somatic syndrome and maintain that what begins as a limited, sporadic outbreak of the syndrome in small groups, like residents of a small community or colleagues in the workplace, spreads to others

³⁶ Ibid., 233.

³⁷ A.J. Barsky and J.F. Borus, "Functional Somatic Syndromes," Annals of Internal Medicine 130, No.1(June 1, 1999) 910.

³⁸ Ibid., 912.

with similar risk profiles after widespread media coverage and alarm is generated. While the symptoms may initially suggest infectious contagion or exposure to a common toxin, the doctors' epidemiological study demonstrates that the contagion actually spreads by interpersonal communication, acquaintance and familiarity of group members, as well as with physical proximity to the exposure.⁴⁰

Barsky and Borus' explanatory model for the genesis and maintenance of the functional somatic syndrome offers strong support for my theory regarding the residents in this case. Based on their model, and all that has been written on hysteria, I firmly believe these residents suffered from functional somatic syndrome, mass hysteria, mass psychogenic illness, mass sociogenic illness, or whatever other label one chooses to use. All of the residents in this particular litigation suffered from the same symptoms as the rest of us. We, in the general population, would attribute all of our coughing, sneezing, runny noses, watery eyes, and itching throats to the common cold, allergies, and/or hay fever. These residents attribute all of their ailments to their physical proximity to the dump and the sewage treatment facility. No doubt, if there had been a printing company in the neighborhood, the lawyers in this case would have blamed the paint fumes for the residents' ailments and sued the printing company as well.

Contributing Factors to Syndrome Amplification

Finally, the Barsky & Borus study analyzes in detail the four specific contributing factors to amplification of the syndrome symptoms. They are: 1) the belief that one is sick; 2) the power of suggestion; 3) the sick role; and, 4) stress and distress. The doctors offer empirical evidence

³⁹ Ibid.

⁴⁰ Ibid.

for each of these psychosocial factors positing that they not only amplify the somatic symptoms but perpetuate and maintain the patient's symptoms of distress.⁴¹

Barsky and Borus further assert that bodily perception is an active process, never a passive one. Day after day, we are bombarded with outside stimuli, somatic and visceral, some are filtered through the brain to our conscious level; some stimuli go unnoticed. The doctors maintain that this filtering and appraisal process of what information reaches the conscious level is an ongoing process determined by our suspicions and/or expectations. Symptoms previously overlooked may take on pathological significance and be amplified to conform to changing expectations. Barsky and Borus document study after study of healthy individuals succumbing to illness and exhibiting symptoms once they had been labeled as ill or were told that they had been exposed to disease causing agents.

Also relevant to this case study is the work of P.R. Lees-Haley and R.S. Brown. In "Biases in Perception and Reporting Following a Perceived Toxic Exposure," these two scholars concluded that one's belief about an illness even biased the recall of past symptoms of the sufferer.⁴² The more convinced a functional somatic syndrome person is that he is sick the more serious and pathological the symptoms become so much so that even his recollection of experiencing the symptoms in the past becomes tainted.

The power of suggestion is persuasive and pervasive; humans tend to perceive what they expect to perceive. In a study conducted by Myers, Cairns, and Singer, for example, in 1987, even the patient consent form was blamed for suggesting possible gastrointestinal distress as a likely side effect of the study. Six times as many participants had to withdraw from the study because of gastrointestinal illness as compared to those study participants whose claim forms did

⁴¹ Barsky & Borus, 914-916.

not mention the gastrointestinal side effects.⁴³ Careful study of the claim forms in this case study, as in the Myers, Cairns, and Singer study, is essential to provide critical evidence to support the theory of mass hysteria in the residents.

Social labeling theory suggests that once a person is labeled as sick, his symptoms persist, he is treated as sick, and his recovery becomes more difficult. The responses of those around the sick person, family, co-workers, and medical personnel, can either exacerbate or relieve the pain and symptoms, and, so too with health-contingent litigation and compensation. It pays well to stay sick, and when the continuation of sick benefits is dependent upon the continuation of symptoms, there may be no recovery in sight. Even more amusing are the studies in the literature that suggest that there is a correlation between repetitive strain illness and injury and the availability and generosity of the workmen's compensation claims. The evidence indicates that once the administrative and judicial decrees determine that no more compensation for injury is available, the injuries improve.⁴⁴

Two types of stress are relevant to the present study. The first kind of stress is the every day stress of life and its recurring minor irritants. The second kind of stress is the life changing kind associated with a major life event, a natural disaster or flood, criminal victimization, or an exposure to an environmental incident. Major life-changing events require adaptation, and during this time bodily symptoms become amplified.

Stress seems to magnify symptoms in two ways. First, people under stress pay more attention to ambiguous bodily symptoms that they would have discounted under ordinary

⁴² P.R. Lees-Haley and R.S. Brown, "Perception and Reporting Following a Perceived Toxic Exposure," Perceptual and Motor Skills, 75 (1992) 531-44.

⁴³ M.G. Myers, J.A. Cairns, and J. Singer, "The Consent Form as a Possible Cause of Side Effects," Clinical Pharmacology and Therapeutics 42 (1987) 250-253.

⁴⁴ W. Hall and L. Morrow, "Repetitive Strain Injury: An Australian Epidemic of Upper Limb Pain," Social Science Medicine, 27 (1988): 645-649.

circumstances. Under major stress, however, rather than discounting symptom importance, the symptoms take on a life of their own, becoming symptoms of some serious illness never before imagined. Secondly, external stressors cause anxiety and depression, and anxiety and depression both have their own physiological components not the least of which is a decrease in pain threshold and pain tolerance and a feeling of physical threat and jeopardy that perpetuates other somatic symptoms.⁴⁵

Mass sociogenic illness, mass psychogenic illness, epidemic hysteria, mass hysteria, or whatever other label we choose to describe this illness, causes a significant financial burden to schools and the workplace, responding emergency services, public health care systems, and environmental agencies on the local, state, and federal levels. Enter environmental litigation, class action suits, greedy lawyers and frivolous lawsuits and the costs become astronomical.

Historical Evolution of Greed

Webster's New Universal Unabridged Dictionary defines greed as an excessive or rapacious desire, especially for wealth or possessions.⁴⁶ It is definitely uncomplimentary in implication, and conceptually, can be linked to the notion of selfishness and overindulgence. It is a behavior characterized by self absorption, self-seeking, self-indulgence, and self gratification. While there have always been greedy people in this world, the prevalence of greed and the preoccupation with the self is a recent American phenomena. According to James Lincoln Collier, in The Rise of Selfishness in America, the dramatic changes in American's preoccupation with self began in the last decades of the 19th century. Collier's study chronicles the

⁴⁵ L. J. Kirmayer, J.M. Robbins, and J. Paris, "Somatoform Disorders: Personality and the Social Matrix of Somatic Distress," Journal of Abnormal Psychology 103 (1994): 125-136.

⁴⁶ Webster's New Universal Unabridged Dictionary, based on the Random House Webster's Unabridged Dictionary, Second Edition (New York: Barnes & Noble, 2001).

social and moral collapse of Victorian values: the loss of gentility, good manners, concern for one's fellow man, and a morality built on order and decency and self control. Collier blames the dramatic change in societal and cultural norms on two factors: 1) the rise of the industrial society; and, 2) the subsequent impact of the national communications and entertainment industry.⁴⁷

The new industrialized, technologically advanced society brought massive population changes to the city. At the beginning of the Victorian era, America was predominately a rural nation; most Americans were born and raised on farms or in small towns and never ventured beyond their close-knit communities. Collier posits that the flood of immigrants to fill the new labor pool for the industrial city brought with it new challenges for American society; the sheer change in population density had a drastic effect on the culture of permissiveness. New institutions cropped up to meet the demands of the urban city; and, a new class system developed, dividing the population into blue- and white- collar classes.

Immigrants and the Rise of Selfishness in America

The continuous influx of immigrants brought a different set of habits, attitudes, and folkways to the United States. Unlike their American counterparts, the newcomers did not cherish the time-honored values of discipline, hard work, sobriety, and law and order. They lived in a world with few family networks and minimal community interests. They tended to live life in the present, unable to delay gratification, because tomorrow might never come. They moved from job to job and from neighborhood to neighborhood becoming more and more isolated as human beings. As a result, a new ethic emerged, one where the self was the most important social unit and the needs and pleasures of the self were of primal importance. Vice districts came

⁴⁷ James Lincoln Collier, The Rise of Selfishness in America (New York: Oxford University Press, 1991), 126.

into being during this period to meet the needs of the pleasure seekers; and, they were institutionalized with the help of corrupt governments, greedy businessmen, and police and law enforcement officers willing to look the other way.⁴⁸

Over time, industrialized cities produced a growing American middle class, one with more money to spend and more time on its hands. Collier contends that American selfishness and overindulgence, particularly in materialistic terms, resulted in the loss of cherished family values and genuine concern for others. With more leisure time on their hands and more money in their pockets, the pursuit of money became a quest for more material possessions, more self-indulgence, and constant gratification. As a result, Collier laments, all of these factors created a post-industrial society that was both permissive and impersonal.

The Entertainment Industry and the Rise of Selfishness in America

Collier especially blames the entertainment industry for the demise of family, community, and social values. He contends that the middle class was seduced, first, by Vaudeville and saloon entertainment, and later, by spectator sports, music, and the movie and television industries. Increased alcohol consumption and drug use, Collier maintains, are also indicative of the steadily rising curve of self-indulgence so prominent in today's society.

Collier's work is significant for this case study because it clearly documents the institutionalization of the self: how it happened, when it happened, and the consequences of self-absorption for society as a whole. Collier analyzes the use of leisure time and premises that changes in the industrialized city are reflected in the changes in self and in entertainment choices over the years. Before entertainment became an industry, it was an active pastime, and usually a group activity. Children played outdoors together; games like hide and seek, tag, ball, hop

⁴⁸ Collier, 33.

scotch, and jump rope were all commonplace, neighborhood activities. Dancing, sing-a-longs, story swapping, card games and all manner of board games were all active, participatory leisure time activities.

The professional entertainment industry, on the other hand, has forever changed the dynamics of American leisure time activities. The focus has shifted, away from group activities that require active participation, to more passive, self-absorbed activities like watching: watching sporting events, watching movies and television, or watching live concerts; all of these activities can be experienced in groups, true, but no one needs to interact or even communicate with one another to indulge. This is precisely what Collier finds the most troubling about television viewing. It serves to isolate people from one another because to be engaged in watching TV, people have to disengage from one another.

The evolution of television as an industry, therefore, has completely changed the way Americans spend their time. Collier reported that in 1980, Americans spent 31% of their free time watching television as compared to 7% socializing and engaged in conversation. Eight percent of the population enjoyed reading newspapers in 1980, and 6% of those surveyed indicated that they were entertained by other kinds of media.⁴⁹ One can only imagine what the statistics would look like today with widespread access to the internet, 24 hour cable news stations, talk radio programs, and round the clock sports-only television networks.

Unquestionably, Americans have come to depend on television for their news and understanding of the world around them. They use the television to escape the boredom of everyday life, to lift their spirits when they are depressed, to indulge their fantasies when they want to relax, to keep themselves company when they are lonely, and even to acquire more material possessions from the 24 hour shopping stations. Collier has me a bit worried that we

live in a world of zombies, or even worse, Stepford, where the television industry has us all hood-winked, telling us what to think and how to feel.

Collier acknowledges that television is a competition for viewers; television producers are focused on numbers; and, more precisely, how many people are watching at any given time? News programs, he admonishes, are designed to entertain us not to inform us. Reality shows are meant to shock our senses and keep us tuned in, game show contestants compete for millions of dollars, and fantasy programs are written to capture our imaginations. What concerns Collier is how much fantasy can the American psyche take? Collier's right, living in fantasy land has real life ramifications.

Just look at the effects of television advertising on young and old alike. Sports figures, role models, and admired authority figures are encouraging small children to ask Mom and Dad for this or that. Is any child at a loss when asked what they want for Christmas? Children are specific nowadays about their wants and desires. They know what brand names to buy, what cereals offer enticing prizes, what drive thru fast food chains offer special bonuses. No children's television program exists today that encourages its viewers to turn off their TVs and go do homework, read a book, or play outside with friends.

By the same token, what American adult does not stop to listen to the commercial with the guy touting all of his worldly possessions? I've got a new house, new car, new boat, etc. the actor deadpans to the audience. "How do I do it?" he queries. "I'm in debt up to my eyeballs." We all breathe a collective sign of relief because isn't this the American way? Just like the actor in the commercial, television and the entertainment industry has seduced us all into believing that we need this or that to live happily ever after. Now we're even encouraged by the advertising industry to go into debt to acquire, rather than live without. Our self-indulgent society has

⁴⁹ Collier, p. 240.

seduced us all. Is it any stretch to theorize that the trial lawyers in this case, as well as the plaintiffs, have been seduced as well? Not really, the rewards, for everyone involved in this litigation are far too tempting.

The Culture of Selfishness in America

The culture of selfishness has had dramatic implications on the moral, political, social, and economic life of our society. The sexual revolution and the recreational use of drugs and alcohol are suggestive of a general permissiveness and acceptance in the general population. Victorian values, even basic good manners have gone by the wayside; there exists today a new social order, one that suggests that if it feels good, do it. If you spill a hot cup of coffee on yourself, you're entitled to millions of dollars in compensation. If you smell an unpleasant odor in your neighborhood, make your local government pay for any minute of discomfort you might have endured. Entitlement characterizes the new world order. It's all about you, now: say what's on your mind, express yourself, and above all, feel good about whatever you're doing. It's a whole new world.

Collier posits that there are two dire consequences for the rise of selfishness. First, and the worst, is that children have been abandoned. Skyrocketing divorce rates and single parent homes have undermined family unity and forced children to spend significant portions of their childhood away from their parents. Collier believes that as long as adults continue to put their own needs ahead of their children's, our social system will continue to degenerate year after year. Secondly, Collier submits, our insistence on amassing large quantities of private goods has severely impacted how we, as Americans, tend to the public needs.⁵⁰

⁵⁰ Collier, 255.

John Kenneth Galbraith reaches the same conclusion in his 1967 book, The Affluent Society. He opined that we spend far too much of our resources in the private sector and far too little in the public sector. The result is that we like to squander our money on: television sets, not schools; hunting weapons, not police protection; and, brand new automobiles and gas guzzling SUVs rather than mass transportation. By spending our money on self indulgence, we are neglecting the needs and services necessary to a healthy society.

In sum, "a people who will not sacrifice for the common good cannot expect to have a common good."⁵¹ Collier purports that the money is there for better schools, health care, cleaner air, crime prevention, mass transportation, alcohol and drug rehabilitation programs, and any other program necessary to cure societal ills. What is not present, he maintains, is a society willing to sacrifice to provide these programs and an electorate who puts leaders in office who will make the tough decisions to tax and spend to provide the necessary cures. I agree, wholeheartedly with his premise.

Human beings are meant to live with one another; when we withdraw from those around us, for whatever reason, we become loners, depressed, anxious, self-absorbed zombies going through the motions of life. Philosophers agree that the best way to find one's self is to lose one's self. People are the happiest when they are absorbed in something other than self and it is only when we, as a society, are willing to make sacrifices for the good of the whole that our society can prosper.

So like hysteria, the study of greed as it relates to this case study also enjoys a multi-disciplinary approach. The study of theoretical constructs associated with greed emanate from the social sciences: sociology, psychology, political science, and history; from the business sciences: behavioral psychology and economics; and from the canons of the law.

The Lawyer as Statesman

In his book The Lost Lawyer, author Anthony Kronman offers an analysis of the lawyer-statesman tradition, one that emphasized prudence, common sense, character, virtue, political fraternity, and deliberation. Kronman suggests that for nearly two centuries, the aspirations of American lawyers were shaped by their allegiance to a distinctive ideal of professional excellence. So many factors in today's world have contributed to the demise of this historical and philosophical model of the lawyer-statesman idea, not the least of which is the rise of selfishness in America. Kronman also laments the lack of ethics in the legal profession today; he asserts that the declining prestige of prudence and public-spiritedness within the legal profession has resulted in the denigration of wisdom and character as professional virtues. Entirely too much effort is devoted to technical competence and hourly billing rates and Kronman fears that the profession is "in danger of losing its soul."⁵²

Lawyering at the End of the 20th Century

Sol Linowitz with Martin Mayer take the concept of “self” to the legal arena in their work, The Betrayed Profession: Lawyering at the End of the Twentieth Century. (1996) Theirs is a critical review of the ethics and practice of law in contemporary society. Linowitz argues that most lawyers have lost their connection to the tradition that the law is a public profession—the lawyer’s responsibility is not simply to the client, or to the highest fee obtainable, but to the court. Lawyers are fiduciaries; they are actors on behalf of others who put the interests of those others ahead of their own. In lawsuits brought against city governments or their operating agencies, as in the litigation under study here, the plaintiff-lawyers' role should not be any

⁵¹ Collier, 262.

⁵²Anthony T. Kronman, The Lost Lawyer: Failing Ideals of the Legal Profession, (Cambridge: The Belknap Press of Harvard University, 1995), 113.

different. They are still acting on behalf of others and are called to put the interests of those others ahead of their own.

Researchers at John Hopkins University discovered during their 1991 study that lawyers represented the most depressed group of people of the 12,000 individuals surveyed.⁵³ Another study completed for "Working Woman" magazine in 1993 questioned whether the respondents would choose law as a profession again if they had known ten years previously what they knew at the time they were surveyed. The survey was conducted in 1967 and again in 1993. In 1967, 94% of the women surveyed said that they would choose law again as a profession; but, by 1993, only 54% of the women surveyed would become lawyers again.⁵⁴

What could account for the dissatisfaction of lawyers with their profession? A critical review of the ethics and practice of law in contemporary America reveals that some within the legal profession have created a "legal services industry" and turned a public calling into an increasingly unprincipled business, one pre-occupied with billing hours and amassing riches. The advent of the big law firms, with hundreds of lawyers located in various satellite cities, has produced a working environment where lawyers no longer know their partners; they only know how profitable their offices were and how many hours were billed.

A study conducted by the American Bar Foundation in 1992 found that young rural lawyers placed a higher value on ethical concerns than their young Chicago counterparts in large law firms. Professor Donald Landon, the study's architect, concluded that those lawyers in small settings, like a rural community, lived by their reputations; there was a higher level of personal accountability in the smaller communities. The big law firms, on the other hand, create an

⁵³Sol M. Linowitz with Martin Mayer, The Betrayed Profession: Lawyering at the End of the Twentieth Century, (Baltimore: The John Hopkins University Press, 1994) 242 citing Andrew Herrmann, "Depressing News for Lawyers," Chicago Sun Times, September 13, 1991.

⁵⁴Ibid., citing The Wall Street Journal, 27 March 1993, B-12.

atmosphere of anonymity; not only do lawyers not know each other in a large firm, they may not even know the clients they represent.

The practice of "billable hours" was begun as a reform measure in the 1960s. Previously, lawyers' bills would just read, "For professional services rendered: and then a dollar amount or "Preparation of *Plaintiff v. Defendant* documents" and then, an arbitrary dollar amount. The rise of consumer consciousness, however, made clients demand more of an accounting for the work performed. Computer programs were developed to make the billing job easier; the programs enabled law firms to identify case names, times spent, task performed, and the lawyer responsible for the work on each case. Eventually, a dollar value was assigned for each particular lawyer's hourly wage.

The Slippery Slope from Ambition to Greed to Dishonesty

Zitrin and Langford, two practicing California lawyers and law professors, in their book The Moral Compass of the American Lawyer: Truth, Justice, Power, and Greed, discuss the quagmire facing the legal profession: how to balance ethics with the moral principles of our society? Zitrin and Langford challenge lawyers to a higher standard of ethical behavior, forgoing the business of law to return to the practice of law as a calling to a noble profession. Ethical conduct, they insist, can no longer be defined as any behavior that a lawyer can "get away with" but rather behaving in such a way that their actions are a credit to society as a whole.

This book provided shocking, real-life accounts of unethical attorney behavior especially in the world of the big law firms. Zitrin and Langford explained, in detail, the practice of double billing, billing different clients for the same hour, billing recycled work over and over again to different clients, and also the outrageous practice of billing for overhead expenses, i.e. \$2 a page

for faxes and 25¢ per page for each copy. Some law firms routinely charged for regular secretarial help, online computer research time, and routine telephone calls. Billing seminars were common in the large law firms to teach the younger lawyers how to account for their time on a case, and many were told to bill a minimum of a half hour for any court document they generated, regardless of whether or not it was a standard document prepared by a secretary.⁵⁵

According to Edward Wolff, in his research for "How the Pie is Sliced: America's Growing Concentration of Wealth", in 1979, one percent of the population in the U.S. owned 23% of the wealth, and by 1992, the concentration of wealth had doubled for that one percent of the population; they owned 42% of America's wealth.⁵⁶ While the figures have remained relatively constant since then, it is clear that the rich are getting richer. Lisa Lerman, noting that there are many lawyers among the wealthiest people in the country, examined the relationships among ambition, greed, and integrity in the legal profession for her law review article, "The Slippery Slope from Ambition to Greed to Dishonesty: Lawyers, Money and Professional Integrity." According to Lerman, many lawyers have become obsessed with gaining power within their law firms and increasing their already sizeable incomes. Lerman contends that this preoccupation with money has a corrosive impact on a lawyer's integrity.

Lerman posits that law firms have been reorganized in such a way that they are designed to produce higher salaries. As evidence, she points to more opulent offices at more prestigious addresses, increased firm size, excessive billing rates, dramatically increased starting salaries for new law school graduates, and astronomical draws of firm profits for partners. She offers evidence that associates of large firms are now asked to bill 2300-2400 hours per year before

⁵⁵ Richard Zitrin and Carol M. Langford, The Moral Compass of the American Lawyer: Truth, Justice, Power, and Greed (New York: Ballantine Publishing Group, 1999), 84-87.

⁵⁶ Edward N. Wolff, "How the Pie is Sliced: America's Growing Concentration of Wealth," American Prospect 6 (June 23, 1995)

they can be considered for firm bonuses necessitating some attorneys to bill for time in the bathroom to reach their annual quota. At the same time that lawyer incomes have increased, Lerman also noticed a decline in pro bono work suggesting that a correlation between greater wealth and lesser altruism exists. And, to make matters even worse, Lerman reported on the increasing number of lawyers going to jail for stealing and the dollar amounts stolen were absolutely staggering, in the hundreds of millions of dollars.⁵⁷

Indicators of Lawyer Greed

Why so much greed in the legal profession today? Is it just a reflection of the cultural materialism of today's society? Why would a lawyer invest so much of his time, in law school and afterwards, developing his skills and reputation, build a successful law practice, and then risk disgrace, disbarment, and even jail for embezzling client funds. Lerman suggests that there are specific "greed triggers" for lawyers and then a slippery slope from ambition to greed to dishonesty. The risk factors include: 1) the desire for money; 2) the desire for status, manifested as competitiveness among partners within the firm and accompanied by a desire for status outside of the firm; 3) declining loyalty; 4) opportunity; 5) firm culture; and, 6) lawyer rationalization.⁵⁸

What causes a greedy lawyer to go beyond the limits of propriety? Whether it is his own materialism, the materialism of a spouse or just the economic pressure to maintain an affluent lifestyle, a lawyer's desire for money can lead him astray, taking money that does not belong to him, stealing from his law firm and partners, or even stealing from his client. Lerman also addressed the entitlement issue in her study; the desire for status and an unhealthy competition to

⁵⁷ Lisa Lerman, "The Slippery Slope from Ambition to Greed to Dishonesty: Lawyers, Money, and Professional Integrity," Hofstra Law Review 30(22 May 2002): 879.

⁵⁸ *Ibid.*, 909-912.

keep up with their partners, she concludes, is a factor in the attorney's desire to be paid more for the services rendered.

Another indicator of lawyer greed is the declining loyalty in today's profession: loyalty to the client, to the firm, and to the bar itself. Because greed and selfishness are manifestations of the turning inward to self, a self absorption that isolates us from those around us, when a lawyer succumbs to greed, he turns his back on what is in the best interests of the client, the firm, and society. The lawyer's needs become paramount and his primary focus turns inward. There is no loyalty to anyone else; the loyalty is to the self and the acquisition of more, i.e., more money, power, and prestige.

If lawyer greed mirrors the rise in greed and self-indulgence in the general population, what puts lawyers on that slippery slide from greed to dishonesty in their professional life? Lerman contends that it is the opportunity to commit fraud and the lack of oversight that delays discovery of the fraud or prevents its discovery altogether. In many cases, there is no one looking over the shoulders of the greedy lawyers. They are free to bill whatever they want, with little oversight from clients or their firms, and most importantly, they have the authority to write checks and mismanage client funds, primarily because their credibility is above suspicion.

Finally, Lerman maintains that it is the lawyer's training in rationalization techniques that aids in his downward spiral to dishonesty. Law schools train students in how to argue, expecting them to argue every side of any issue. Beyond law school, lawyers may pad a bill a few hours one month, more the next, and a little more the next. Or, some lawyers may turn in receipts for meals ascribing them to meals with a client or business meals. Rationalizing dishonesty takes practice but it becomes easier and easier with each rationalization. Lehrman has even perfected a formula to succinctly delineate her theory:

"desire for higher income + economic pressure + competition with partners + sense of entitlement + declining loyalty to partners or clients + perceived opportunity to steal undetected + profit-oriented firm culture + ability to rationalize = risk of temptation to dishonesty."⁵⁹

To me, the most shocking revelation of Lerman's study is the widespread pervasiveness of lawyer misconduct and the fact that it is difficult to calculate just how widespread the misconduct is. Lerman maintains that lawyer misconduct happens in large firms, small firms, in private practice and in government. So much of the misconduct goes unnoticed, and sometimes, even when it is discovered, depending on the client, it still may go unreported, resulting in no disciplinary action at all.

Historically, lawyers have enjoyed almost iconic stature in the United States. Our founding fathers, John Adams, Thomas Jefferson, John Jay, and John Marshall were all lawyers, as were Abraham Lincoln and Franklin D. Roosevelt. There was a great responsibility attached to being a lawyer; a responsibility not just to the client but to the court and the law as well. The lawyer-client relationship was as sacred and privileged as the confidentiality between parishioner and clergyman. How sad that the cultural evolution of self has eroded such a time-honored profession. We have only ourselves to blame for this predicament.

⁵⁹ Ibid, p. 912.

CHAPTER III

METHODOLOGY AND DATA COLLECTION

This case study is explanatory in design, offering competing explanations to the same set of events. The rhetoric of the study is first person and personal at times, but also employs a quantitative dimension, offering factual, impersonal, and formalized language related to evidentiary matters, scientific studies, and laboratory test results.

Study Population

There are three units of analysis in this study: the plaintiff residents, the plaintiffs' lawyers, and the Sewerage and Water Board of New Orleans.

The Plaintiffs

Initially, there were two separate lawsuits filed in this case study. The first one was filed in 1990 and included 270 plaintiffs; the second one was filed in 1991 and included 132 other plaintiffs. The lawsuits were consolidated so that the matter, representing all 402 plaintiffs, could be litigated together. Over time, that number of litigants changed; some plaintiffs were added to the lawsuit, some plaintiffs were dismissed from the lawsuit for various reasons, and some plaintiffs chose not to remain a part of the lawsuit and were dropped accordingly.

In all, defense counsel identified 537 residents as parties to the lawsuit, either in the original lawsuits or in the addendums to the lawsuits. Although 537 plaintiffs' names were gleaned from the court records, some of these people never became a party to the litigation. In fact, only 502 claim forms were actually submitted in this litigation, and some of the claim forms were completed by individuals who never became a party to the lawsuit.

The Plaintiffs' Lawyers

Initially, the plaintiffs asked the lawyers to provide legal expertise to assist them in getting the BFI landfill closed. The plaintiffs had no specific charges against the Sewerage and Water Board or its operation. The lawyers helped form a neighborhood organization to assess the neighborhood's complaints and grievances against the landfill. The neighborhood organization provided the forum for the lawyers to meet regularly with the neighborhood, gain their trust, and act on their behalf in having the landfill closed. Monthly meetings and newsletters kept the neighbors apprised of the efforts being made on their behalf. At each meeting and in each newsletter, members were asked to bring more potential members to the meetings.

The same three lawyers represented all the defendants in the consolidated case. Each lawyer maintained a separate office with a separate staff. I do not know how many other cases they worked on together but all three were counsel of record in this case. I do not know how the workload in this case was distributed. I do know that one lawyer and his staff handled the claim form management process and another had his staff, on site at various Sewerage and Water Board offices, reading through documents in the discovery process. The volume of documents involved in this litigation required a staff of people on both plaintiff and defense sides. The task of perusing, marking for copying, numbering, and indexing documents was an ongoing job and required months and months of tedious reading.

I was not privy to how this litigation was funded by the plaintiffs but with so much time and expense invested in this lawsuit, it became clear that these expenses had to be recouped.

The Sewerage & Water Board of New Orleans

The Sewerage and Water Board of New Orleans is, primarily, a public body totally funded by the sale of water and sewer services to the public; the rate for services provided is determined by public referendum. The board of the Sewerage and Water Board is not elected; it is composed of political appointees; the mayor serves as president of the board. Two councilmen also serve on the board and all other members of the board are appointed. The agency culture, agency climate, managerial philosophy, agency resources and constraints and their coordination are all important factors in the study of the Sewerage and Water Board. The human factors are also of paramount importance. The leadership, group dynamics, even the elements of fear and greed, play a part in the study of the Sewerage and Water Board.

Agency culture is manifested in an almost laissez-faire attitude. Most of the Sewerage and Water Board employees are civil service. This means that they must take a test to be hired; their pay scales are fixed and pre-determined; and most importantly, it is very difficult to get rid of a civil service employee without proper notice and documentation. Everyone supposedly does what is required in their job descriptions. There is no reason to complete a job expeditiously as there is no compensation or reward for finishing a task early; most employees are happy with the routine of their jobs and are not about to take on any additional work without monetary payment. And with the protection of civil service, they are happy working their shifts and going home.

Concepts of Hysteria and Greed

The next step in the research design process was to operationally define hysteria and greed. According to Singleton and Straits, the choice of operational definitions is traditionally a matter of creativity, judgment and practicality. The quality of the definition is determined by the

reliability, validity, and levels of measurement of the construct.⁶⁰ Following a review of the literature, I chose to lump the concept of hysteria, mass psychogenic disease, mass contagion, mass sociogenic disease, or functional somatic syndrome, into one all-encompassing theoretical construct, i.e., hysteria: an illness with symptoms that are diffuse, nonspecific, and ambiguous and prevalent in a healthy, non-patient population.

The data sources provided the necessary documentation to establish indicators for the various concepts. Hysteria is a “psychiatric condition characterized by excitability, anxiety, and the simulation of organic disorders.”⁶¹ Since most plaintiffs claimed health problems as a result of living near the Sewerage and Water Board treatment facility, an excellent indicator of “organic disorder” was determined by examining each individual plaintiff claim form (part of the public record in this case).

After reading through claim form after claim form, it became apparent to me that the plaintiffs' symptoms appeared to be common ailments that affected everyone in the general population. Using Access 97, I prepared a database with all of the answers from each plaintiff claim form, being careful to use the exact same wording used in the claim form. The database provides an accurate picture of each individual claim form and makes it possible to make inferences about hysteria in the neighborhood.

Burning eyes, sore throats, allergies, and respiratory complaints were the most common symptoms of the claim form respondents. The Access database includes all four symptoms, the date the symptoms first became evident, and the last time the plaintiff experienced the symptoms. The dates were entered in the database just as they appeared on the claim form; each particular symptom appeared as a column head in the database so that it was possible for the

⁶⁰ Royce A. Singleton, Jr. and Bruce C. Straits, Approaches to Social Research 3ed. (New York: Oxford University, 1999) 109.

researcher to enter "yes" or "no" to indicate whether the plaintiff suffered from the symptom or not. Additionally, the database includes a column for "Other Ailments."

Another question on the claim form asked whether or not any doctor had told any respondent that his/her symptoms were caused by the Sewerage and Water Board odors, emissions, or toxic substances. And, if so, a space was provided for the name of the doctor who had made this diagnosis. A review of the database confirms that the symptoms suffered were predominately common ailments present in most neighborhoods in southeast Louisiana. Only in very rare instances did any doctor indicate that the Sewerage and Water Board was the cause of the symptoms, and, this may have been a miscommunication between doctor and patient. All in all, the database supports the theory of hysteria in the neighborhood.

The concept of greed was not as easily quantified as the concept of hysteria. The researcher can only point to behavior and conduct that was not suggestive of the lawyer-statesman tradition espoused by Kronman in the Lost Lawyer, a tradition characterized by prudence, common sense, political fraternity, character, and public-spiritedness.⁶² The growing trend to practice law as big business rather than a profession has placed the legal profession in a slippery ethical quandary. Ethical dilemmas in modern law are often shocking to public sensibilities but they are rooted in an adversarial system that encourages lawyers to act in ways that are not always socially altruistic.

Since greed is defined as an excessive or rapacious desire, especially for wealth or possessions, it is much more difficult to operationally define the concept of greed because the indicators of greed are much more subjective. In this litigation, I used as indicators the basic honesty, trustworthiness, and professional conduct or lack thereof of the lawyers' actions as they

⁶¹ Webster's New World Dictionary of the American Language, (New York: Warner Books, 1987).

⁶² Kronman, 1.

related to both plaintiffs and defendants. I identified acts of intimidation, ethical misconduct, and dishonesty disguised as client protection by plaintiff lawyers. I hypothesized that greed was the motivating force behind the lawyers' acts of intimidation, lack of professionalism, aggressiveness, and deceptive overtures to their clients, the Sewerage and Water Board, the defense attorneys and their paralegals.

These working definitions for greed are situation specific. Since I had relatively little direct interaction with the plaintiff lawyers, they provided an unobtrusive data source for this research. The plaintiff lawyers were never directly questioned for this research nor were they aware that they were being observed for research purposes. Other indicators of lawyer greed in this litigation were the use or misuse of expert witnesses. Depositions, attorney correspondence, neighborhood meeting notes, and court testimony were all used to examine the concept of greed as it related to plaintiffs' counsel.

The uses of multiple sources of evidence to support my hypothesis concerning plaintiff hysteria and lawyer greed is a major strength of this case study ensuring reliability and construct validity. Most importantly, the process of triangulation and the development of converging lines of inquiry lend credence to the findings and conclusions of this research.

Primary Data Sources

According to Yin, in his book, Case Study Research: Design and Methods, "the case study investigator is a vicarious observer, and the documentary evidence reflects a communication among other parties attempting to achieve some other objectives."⁶³ In this case study, the researcher was a vicarious observer having minimal contact with the plaintiffs and their attorneys. In fact, only on very few occasions was I able to observe attorney behavior first

hand and I only observed a few of the plaintiffs from a distance. Consequently, the plaintiff claim forms provided most of the data necessary to support the theory of hysteria as a cause of illness in this case study. In addition to the claim forms, depositions, questionnaires from the independent medical examiners, and testimony and reports from the expert witnesses provided other sources of data to buttress the hysteria theory as it related to the plaintiffs. Likewise, depositions, attorney correspondence, neighborhood meeting notes, and court testimony all served as primary data sources to examine the concept of greed.

Less formally, direct observations of staff attorneys and contract employees were made throughout the discovery process as I was present whenever discovery was conducted on the Sewerage and Water Board premises or in the offices of the Sewerage and Water Board's outside counsel. Consequently, the researcher and the plaintiffs' attorneys' support staff were in the same room, all day, day after day, for weeks on end, as the support staff, consisting of one associate attorney and one environmental expert, read through documents and decided what documents were relevant enough to be numbered and copied. The atmosphere in the room, the work ethic of the plaintiffs' support staff, and the attitude, demeanor, and conversations of the support staff allowed the researcher to draw inferences about the attorneys and their staff.

Sewerage and Water Board public information records, operating and maintenance records, board meeting minutes, budgets and financial reports, and interviews with various department heads provided primary source information to support the theory that plaintiffs were not exposed to any toxin that would cause serious, chronic illness. At the same time, the Sewerage and Water Board records and interviews provided evidence to support the premise that the board is indeed vulnerable to litigation by well financed lawyers.

⁶³ Robert K. Yin, Case Study Research: Design and Methods, 2ed. Applied Social Research Methods Series, 5(Thousand Oaks: Sage Publications, Inc.), 82.

Primary data was available for this case study in the form of hundreds of thousands of pages of documents used in the litigation process. Besides the resident surveys, individual plaintiff claim forms, and the Sewerage and Water Board records, landfill records, Louisiana Department of Environmental Quality records in Baton Rouge were all examined for this study.

Secondary Data Sources

Satellite images, the EPA Toxic Release Inventory, organizational charts for the defendants in this case, neighborhood association meeting minutes, notes, and newsletters all provided secondary source material for this research. Pictures, maps, videos, and GIS data were also utilized in the data collection process.

Research Design

I chose the single case study method because it allowed for an empirical inquiry to investigate "a contemporary phenomenon within its real-life context." ⁶⁴The single case study method was appropriate in this case because the boundaries between the phenomenon and the context were not obvious; I could rely on theoretical propositions to guide the data collection process and the data analysis. This case also represents a unique event and serves a revelatory purpose because it provided me the opportunity to observe and analyze phenomenon not accessible to scientific research previously.

I used multiple sources of evidence available so I knew the process of triangulation would be possible. In Case Study Research, Yin explains that a research design is "the logic that links the data to be collected (and the conclusions to be drawn) to the initial questions of a study."⁶⁵ A good research design enables the investigator to draw inferences about the causal

⁶⁴ Yin, 13.

⁶⁵ Yin, 18.

relationships among the variables studied and, most importantly, allows for interpretations to be generalized to a larger population or to different situations.

Why did I choose this particular litigation for the subject of my research? Truthfully, it was to break the monotony of the monumental job of reading through millions of pages of documents. All documents had to be read, numbered if they were not already, and indexed so they could be readily found when needed. Yet how many pages were vital to the defense of this case? How many documents would actually be used at trial? How could I make all of my time and effort meaningful? How much taxpayer money was going to be expended for document copying, preparation and production to other counsel of record in this case?

Eventually, the plaintiff claim forms began arriving into the office of the Sewerage and Water Board's outside counsel; they arrived in packets, just a few at a time, over a period of many, many months. Most of the claim forms were incomplete; most were completed in the same handwriting, and even more disturbing, they raised more questions than they provided answers. Why were some of the residents sick and some not? Why were the symptoms so varied, with some residents claiming they developed cancer and others complaining only of allergy symptoms. What was going on in St. Bernard and how much public monies would be expended to find out? As a researcher, I wanted answers, and I hoped that this case study would provide answers that could be generalized to a larger population or to different situations in which a public agency was being sued.

Yin maintains that there are five important components to a good research design: a study's questions; its propositions; its unit(s) of analysis; the logic linking the data to the propositions; and, the criteria for interpreting the findings.⁶⁶ The litigation before me had all of these elements. The study questions were obvious; the propositions, not so obvious. What made

these residents sick and how did an odor warrant full scale litigation. I relied on existing theoretical definitions in the medical and social sciences literature to develop the concepts of hysteria and greed. In this way, I was able to tie the case study to the existing body of knowledge for hysteria, and, in so doing, made this research applicable to the broader scientific body of knowledge.

Two tactics were employed to increase construct validity: multiple sources of evidence and a chain of evidence. I do have some concerns about the internal validity of this case study. For the most part, I am relying on the evidence at hand to determine whether or not the residents in this case were truly ill. My hypothesis is that they are not; but, if they are, I do not believe that it was their proximity to the sewage treatment plant that caused their illness. I am limiting the case study to the information at hand. If the plaintiffs are really sick, however, there may be other causes for their illness not even considered by them or this case study. For example, there is evidence to suggest that they may have experienced symptoms as a result of being downwind from the oil refinery across the river. While I recognize the threat to the internal validity of this case study by not exploring all possible causes of the odor, it remains beyond the expertise of this researcher to investigate other causative factors.

Nevertheless, what this case study may lack in internal validity, it compensates for in external validity. The findings and conclusions of this research are easily generalized beyond the immediate case study. Although external validity can be a problem in some case studies, the findings here can easily be replicated in other neighborhoods and communities so the threat to external validity is minimal in this case study. I have established a case study protocol for document management and I have also developed a case study database using Access '97 software.

⁶⁶ Yin, 20.

A case study protocol was established to increase the reliability of this research and to aid in the data collection process. Initially, in reviewing the plaintiff claim forms, I concentrated on demographic information and descriptive notes but as the study progressed new questions arose that I thought might impact the study's internal validity. For example, could the residents' symptoms be related to whether or not they smoked and the frequency of their smoking? Were the plaintiffs exposed to odors, emissions, or toxins in their work environment? Were the plaintiffs perennial plaintiffs, i.e., were they involved in any other lawsuits? Did they have money problems? Had they ever filed for bankruptcy? As each new question arose, a separate column was created to record the findings on the database for each claimant. All of these questions, and many more just like them, served as reminders to me regarding what information needed to be collected and why.

Finally, the case study protocol provided a mechanism to access all the documentation accumulated in the course of my research. The documentary evidence in this case study, i.e., court records, published reports, publications, memoranda, service reports, claim forms, etc., filled countless boxes, file cabinets, offices, and store rooms. Most of the documents have been filed away, by page number, box number, and location. While most documents may never see the light of day again, each sheet of paper did become an integral part of the database for this litigation.

Data Collection & Analysis Procedures

In order to establish "construct validity" and "reliability" in this case study so that there could be a logical linking of the data to the propositions, Yin suggests three methods of data collection: 1) the use of multiple sources of evidence; 2) the creation of a database; and, 3) maintenance of a chain of evidence.

The multiple sources of evidence available in this case study and the massive amount of information available in each source was especially mind boggling to this researcher. Summarizing and indexing each document and putting everything in a computer friendly framework made the task more palatable but it was necessary to regularly back up all data on floppy disks to ensure that no computer malfunction erased the work collected over a three year period.

The variety of documents was extensive. Documents relative to the plaintiffs included depositions, medical examinations, claims forms, neighborhood newsletters, and letters of complaint to various agencies, newspapers articles, and notes made by counsel of record regarding individual plaintiffs. By far, the most informative was the plaintiff claim form.

The claim form consisted of four legal sized pages to be completed by each plaintiff so that there was one claim form for each plaintiff whether the plaintiff was the head of household or a minor child in the household. The claim form, after completion, was to be notarized before it became part of the record in this litigation. Claim forms identified each plaintiff by name and address, age and occupation and specifically asked when the plaintiff first noticed an impact on his/her health as a result of living near the Sewerage and Water Board Treatment Plant and the BFI dump site. For the purposes of this research, however, only data related to the Sewerage and Water Board Treatment Plant was collected and examined.

Plaintiffs were to respond to the questions on the claim form to the best of their ability and to provide complete answers. Plaintiffs were asked what type of illness they suffered as a result of living near the Sewerage and Water Board treatment plant, what were their symptoms, the duration of their symptoms, the last time they experienced the symptoms, and whether or not a physician had diagnosed the symptoms and attributed them to living near the treatment plant. If

the treating physician did attribute the illness to the proximity of the sewerage treatment plant, the claim form asked for the name of the doctor or doctors who made this diagnosis. The claim form also asked each resident to indicate the source of the impact on their health: was it odors, emissions, or toxic substances or all three? All of this information was compiled by the researcher in an Access database for study and review.

The documents relating to the plaintiffs' lawyers were gleaned from depositions, court records, letters to opposing counsel, notes from telephone calls to opposing counsel, direct observation methods, and information from newsletters and newspaper clippings.

The Sewerage and Water Board documents included letters, memoranda, agendas, announcements, minutes of meetings, and the written reports of events, administrative documents and other internal service and operating reports, formal studies or evaluations of the site from expert witnesses, newspaper clippings and other articles appearing in the mass media, maps, charts, personal records and reports on employees, and relevant GIS data. Attention was even paid to different drafts of the same text to ensure that substantive changes had not been made in the course of revision writing.

Triangulation, the process of developing converging lines of inquiry as a result of using multiple sources of evidence, makes this case study and its findings all the more convincing, accurate, and reliable. The case study database also makes the study more reliable because it provides future investigators a means to analyze the data apart from the written reports; consequently, future investigators are able to use the Access database to postulate other theories for the causes of functional somatic syndrome.

Finally, I have maintained a comprehensive case study chain of evidence. All of the evidence collected remains in its original form. No original evidence has been lost; consequently,

any future investigator can trace the research process backward at will. The quality control of the data collection process has been maintained.

Limitations & Assumptions

Yin maintains that the case study investigator must be a vicarious observer. In this case study, I was a vicarious observer, but there were some limitations to observing from afar.

For one, the plaintiff claim form was not as informative as it could have been. The questions were open-ended and not specific enough. The plaintiffs did not complete the forms on their own; most of the claim forms were completed by the same person, probably a secretary or receptionist in the office of one of the attorneys. Consequently, although some of the answers to the same question were different, they followed the same train of thought, suggesting to me that the claimants may have been assisted in providing the responses.

Furthermore, it is difficult to analyze the data in its totality because of the large variety of answers to the same question. For example, when asked when the plaintiff was first impacted by the odors, emissions, or toxic substances emanating from the East Bank Sewage Treatment Plant, there were a multitude of answers. Few plaintiffs gave definitive dates; most gave a range of dates, some gave one date for odors and a different date for emissions, and some failed to answer the question at all. There were, however, a significant number of plaintiffs (205) with the 1980s in their answer. (Table 7.) Had a social scientist or this researcher written the claim form questionnaire, the questions would have been more date specific allowing for a better analysis of the end product. Since the claim form was probably composed by a legal team, the results are not as easily quantified.

Table 7. *Impact Date with 1980s*

Count by SWB IMPACT DATE

1	1970/early 1980s	2	1986
1	1970s/1980s	4	1987
1	1970s/O-1980s/E	3	1988
1	1970s; Worse 1980s	3	1989
1	1978-1980S	1	August 1988
12	1980	4	early 1980s
114	1980s	1	Late 1970s-1980s
1	1980s-1993	9	late 1970s/1980s
1	1980s/O-1970s/E	5	late 1970s/early 1980s
1	1980s/O-1973/E	1	late 1970s/mid 1980s
2	1981	7	late 1980s
1	1982	1	late1970s/1980s-O/1980s-E
1	1983	1	MID 1970s/1980s
5	1984	15	mid 1980s
4	1985	1	mid1970s/1980s

Total: 205

Source: Author

Another limitation for me was the obsolescence of the Access '97 software used in creating the database. Access is a difficult program to master; I used it, for mapping purposes, so that the data would be compatible with GIS software. I have since converted the data to Excel to make it more user-friendly.

Finally, there are limitations to replicating the study in the same community. Hurricane Katrina has destroyed the housing and dispersed many of the claimants in this litigation. If it were possible to locate the transplanted residents, it would be informative to learn if they are still suffering from the symptoms described in their claim forms.

Summary

The study design is qualitative, a single case study, utilizing inductive logic. Through identification and description of “context bound” information, a pattern or theory emerged to explain the phenomena of neighborhood hysteria and attorney greed and its impact on a public agency's fiscal policy. Understanding the ramifications to the public interest when these two groups unite is imperative in our litigious society. This case study is illustrative of the need to formulate public policy that not only protects the public interest but also protects the individual rights of its citizenry.

I have vicariously observed all of the players over a prolonged period of time, collaborating to some extent with each of them. I have used both primary and secondary data sources. Primary data was available in the form of hundreds of thousands of pages of documents used in the litigation process; secondary data sources included satellite images, information from the EPA Toxic Release Inventory, neighborhood association notes and newsletters, pictures, maps, and videos.

A study of Sewerage and Water Board records furnished the researcher with the historical information specific to the city of New Orleans. Sewerage and Water Board public information records, operating and maintenance records, board meeting minutes, and other documentation have been analyzed, and archival records such as service records, maps, charts, organizational records, budgets, etc. have provided corroborating evidence to the data collected.

The use of multiple sources of evidence is a major strength of this case study, ensuring reliability and construct validity. Most important, the process of triangulation and the development of converging lines of inquiry lend credence to the findings and conclusions of this research.

A database for this case study has been assembled using research methods presented by Robert K. Yin in his definitive work: Case Study Research: Design and Methods. Plaintiff claim form information has been compiled using Access '97 software. Health complaint information, familial relationships of plaintiffs, smoking habits, work histories, prior litigation histories, criminal records of plaintiffs, real estate data, and other data have been logged for easy reference. Case study notes have been catalogued by general topic, e.g., expert witness meeting notes, summary notes outlining health claim inconsistencies, deposition summaries, etc. An annotated bibliography of all case study documents was compiled to effectively access the millions of pages of documents involved in this case study. A credible chain of evidence exists for the interested observer to retrace this researcher's steps in any direction.

CHAPTER IV

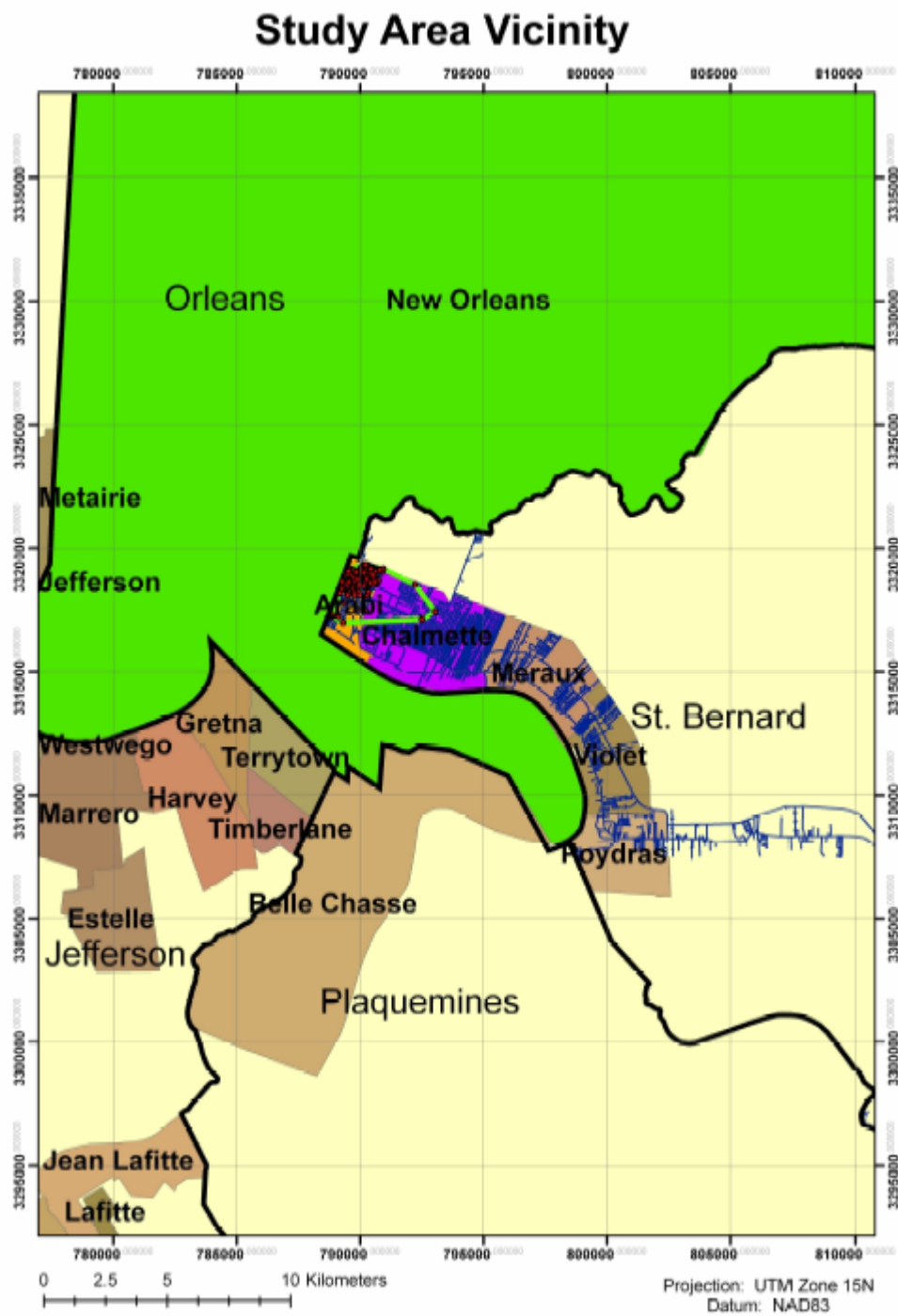
DATA ANALYSIS

The Plaintiffs

Although defense counsel identified 537 residents as parties to the lawsuit, either in the original lawsuits or in the addendums to the lawsuits, in actuality, the number of plaintiffs changed on a regular basis. There were 502 individual claim forms processed in this litigation, but again, these 502 claim forms did not necessarily represent actual litigants in the lawsuit. The reasons for this disparity in numbers will be addressed later, in the analysis of the plaintiff lawyers. I will, however, use all 502 claim forms in my analysis as all of these individuals took the time to complete the forms and lived within the geographical bounds of this study.

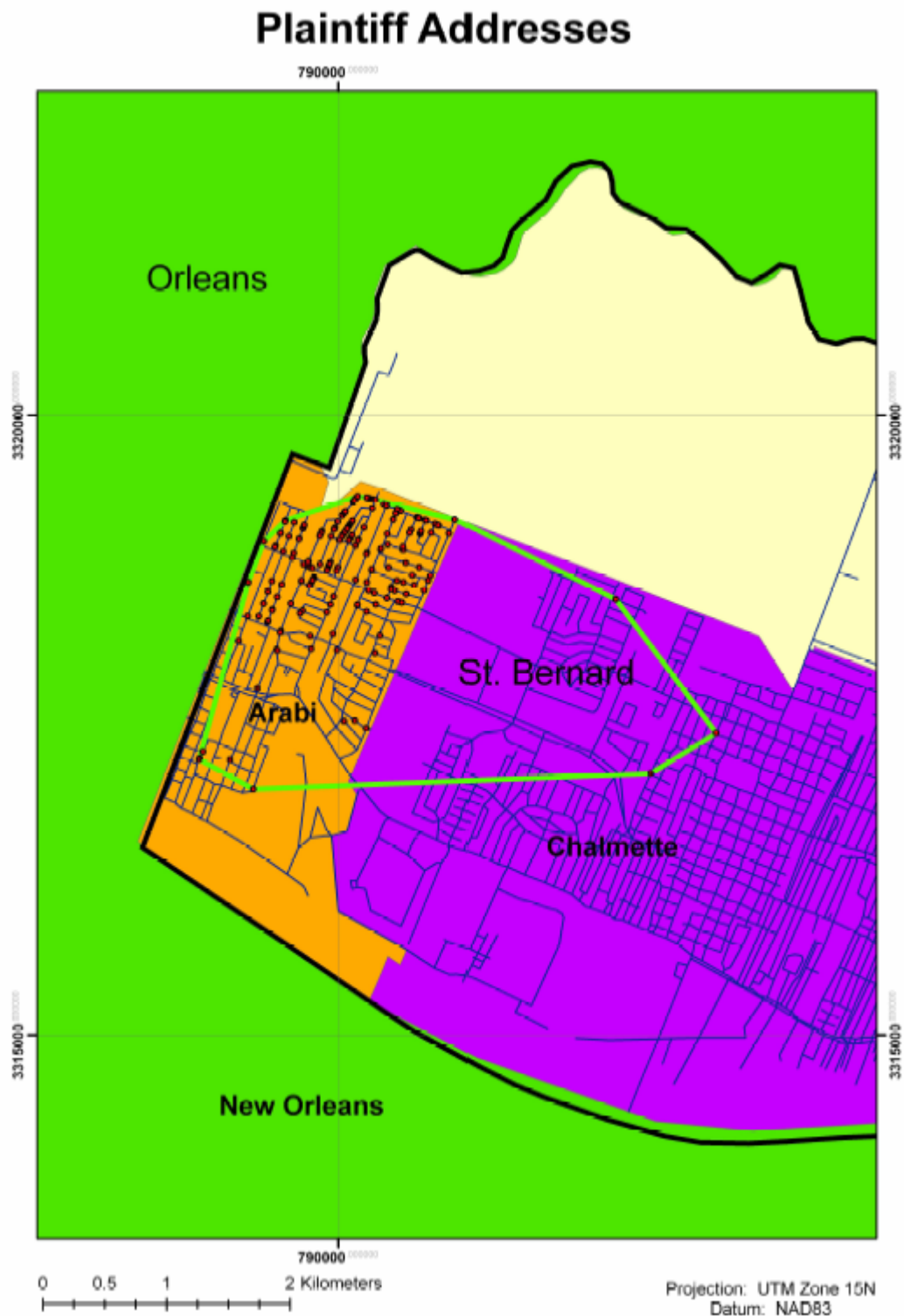
With the exception of five plaintiffs, all plaintiffs lived in the same general area. (Map 1) The homes were located mostly in Arabi Park, St. Claude Heights, and Carolyn Park bounded by Benjamin Street to the north, Angela Street to the west, and Cougar Street to the east. Map 2 illustrates the St. Bernard study area and its physical proximity to Orleans, Jefferson, and Plaquemines parishes. I compiled a database that included the addresses of each plaintiff home. The data was then reprojected from Lat Lon to Universal Transverse Mercator Grid (UTM) Zone 15, used for scientific work. Navigation uses Lat Lon, but land-based work uses planimetric coordinates because the scale of this area does not need to take the curvature of the earth into account. Treating the Earth as flat greatly facilitates distance and direction calculations.

Map 1.



Source: Author

Map 2.



Source: Author

Maps 3 and 4 include some aerial imagery. The maps are projected to UTM Zone 15 North and are based on the North American Datum of 1983. Street centerlines are taken from the Census 2000 TIGER files released by the Census Bureau. Other features come from the EPA's Toxic Release Inventory, the USGS, and the LSU ATLAS site at www.atlas.lsu.edu. Although Arabi lies a few hundred meters to the east of the UTM Zone 16 boundary, UTM-15 is the de facto standard in Louisiana scientific writing. The slight distortion caused by observing this convention will not create any problems of interpretation.

Map 3. Aerial Imagery of Plaintiff Addresses, SWB Treatment Facility, and BFI Landfill.



Source: Author

Map 4. Study Area over Aerial Imagery.



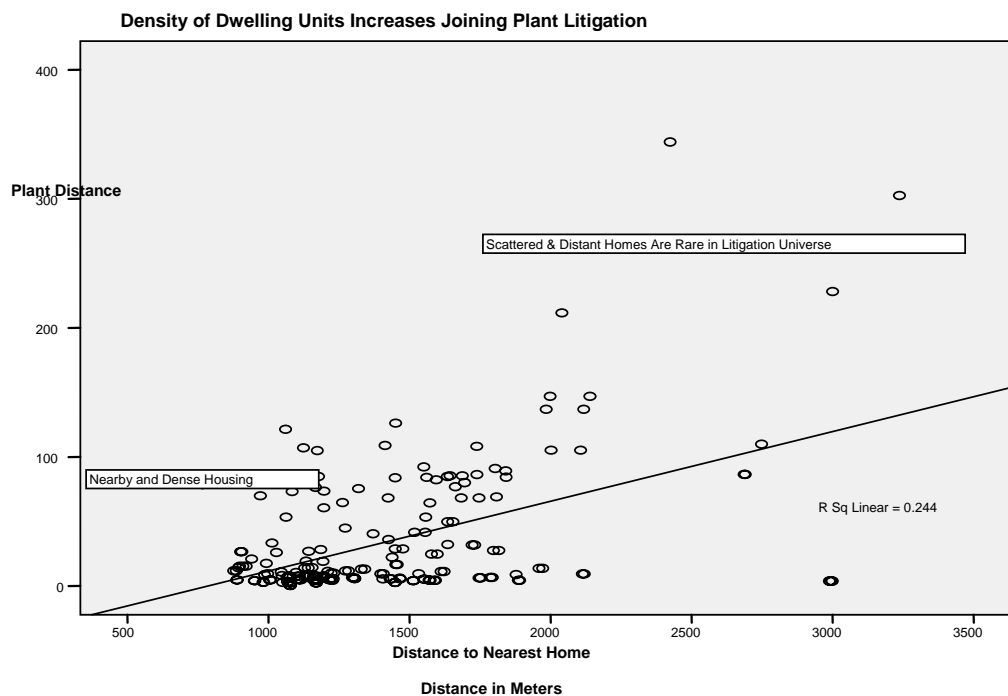
Source: Author

Maps 3 and 4 present a clear picture of the East Bank Sewage Treatment Plant, the nearby landfill, and the St. Bernard neighborhood. The images are geo-referenced, using position coordinates, to allow SPSS to calculate the distance, in meters, of each plaintiff site to the Sewerage and Board's treatment facility. It is clear from the maps that there is a tendency for plaintiffs to fall off as distance from the treatment plant increases.

Another way to help interpret these maps is to convert them into graphs. For example, a map of the plaintiff dwellings makes it clear that most plaintiffs live very close to the Sewerage and Water Board East Bank Sewerage Treatment Plant. Figure 1 below clearly illustrates that the density and proximity of dwelling units closest to the treatment facility increases the probability that these nearby homes will join in the litigation. The more scattered and distant the homes are to the treatment facility, the more unlikely that they will become parties to the lawsuit.

The density of the dwelling units also supports Boss' theory of hysterical contagion. Boss maintained that the contagion of the epidemic was affected by the behavior performance of socially related people. Once the symptoms of an illness are experienced or become evident to members of a socially related group, it is more likely and more acceptable for others in the group to experience many of the same symptoms.

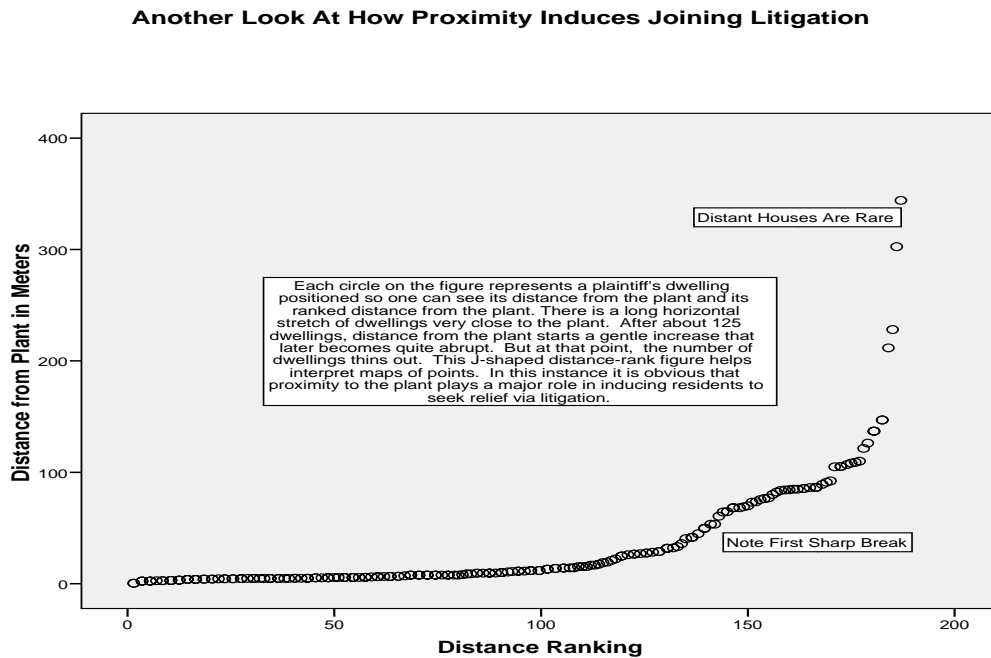
Figure 1.



Source: Author

Another way to look at the map is as a graph with a technique called distance-rank graphing. (Figure 2 below)

Figure 2.



Source: Author.

The circles on the graph suggest that the proximity of the plaintiffs' homes to the treatment plant greatly increases the probability of litigation. One might consider the sewage treatment facility a disamenity in the neighborhood. The J-shaped distance-rank figure offers another look at how proximity to the sewage treatment plant induces residents to join the litigation. A good planning tool for the future would be to properly screen the disamenity from public view either by landscaping, architectural design, or some other screening device.

The close physical and visual proximity of the plaintiffs to the landfill and the Sewerage and Water Board's treatment facility not only induced litigation, it also amplified the symptoms the residents experienced. Social networking, the power of suggestion, and the fear factor greatly influenced the mass hysteria contagion. Could a service road for service vehicles, aromatic landscaping, and a community outreach program have thwarted this litigation?

The Claim Form

I spent well over two years working on the database for this study. The database was a constant work in progress, and to this day, not totally complete. The claim forms were completed in a piece-meal fashion and forwarded to defense counsel, a few at a time, over the course of the two year study. Very few of the claim forms were complete; answers were left blank so it could not be determined whether they were skipped, the respondent did not know the answer, or the respondent did not want to answer what they considered to be personal questions. Unfortunately, there was no space provided on the claim form for a "Don't Know" answer.

All claim form responses were handwritten; most were in the very same handwriting. I do not know why all of the plaintiffs were not given the claim forms to complete in the privacy of their own homes. Instead, many of the plaintiffs were brought in to the offices of their counsel, interviewed, and answers were recorded on the plaintiff claim forms.

All of the claim forms were to be notarized before they were turned over to the defense counsel. The protocol was that the notary would ask each plaintiff to raise his right hand and swear that the information on the document (claim form) was true and correct, and then the plaintiff would sign his name attesting to the authenticity of the document. Besides the notary's presence, there should have been two other witnesses observing the process; the two witnesses

were obliged to sign the claim form as witnesses as well. The claims forms, however, were not notarized properly, and in some cases, were not notarized at all.

Because this litigation is ongoing, I am not at liberty to mention any particular plaintiff by name nor am I permitted to attach as part of this record any of the claim forms submitted to defense counsel as responses to interrogatories or request for production of documents. I have, however, attached Browning Ferris' Supplemental Memorandum in Support of Motion to Compel Discovery. ([Appendix 1](#).) The memorandum offers convincing evidence of the inadequate responses and the procedural improprieties found in all of the claim forms. Again, to make this document available for this study, I have substituted plaintiff numbers for names.

The supplemental memorandum attached to this study was filed subsequent to a previous Motion to Compel, seeking an Order from the judge forcing all of the plaintiffs to provide adequate answers to the claim forms. The claim forms served as interrogatories and requests for production of documents. As such, plaintiffs were to provide truthful answers and swear to the truthfulness of their answers. Having the claim forms notarized and signed by the plaintiffs, two witnesses, and a notary made the claim forms compelling as evidence to be submitted at the trial of this case.

Unfortunately, however, the claim forms, designed to provide legitimate answers to interrogatories and production of documents, instead were a mockery of the judicial system. The memorandum to compel full and complete answers was filed eight years after the filing of the first lawsuit, and still the defendants, BFI and the Sewerage and Water Board, did not have legitimate answers as to how the plaintiffs were injured, what they claimed they smelled, when they smelled it, or how their property had been devalued.

The memorandum also alludes to the procedural improprieties of the notarization process. For example, Plaintiff #248 and Plaintiff #461, husband and wife, dated their claim forms February 25, 1998, but their claim forms were notarized on May 7, 1998, raising a red flag to defense counsel that the answers to these claim forms were not given under oath by these plaintiffs. The discrepancies in dates is disturbing; the dates, by law, should correspond or at least an affidavit should have been attached to indicate that the answers were indeed Plaintiff #248's and Plaintiff #461's and that they swore, under oath, to their authenticity. This particular claim form did not represent an isolated incidence of notarial impropriety. Most of the claim forms had some procedural defect; either no notary signature, no affidavit, different dates on notarizations and affidavits, different dates on claim forms, no witness signatures, etc. The list of inadequacies associated with the claim forms, the evasive answers on the forms, and also the non-answers all raise questions about the truthfulness of both the plaintiffs and the plaintiff lawyers in presenting their case.

Nevertheless, once enough claim forms were received by defense counsel, I began to create a database of all of the responses. I wanted to compare and contrast the responses on the claim forms in order to study the similarities and differences between the plaintiffs. Early on, it became apparent that the answers were too similar to have been written by different people. A side by side check of several of the claim forms revealed that they looked like they had all been completed by the same person, in the same handwriting.

Even more disturbing was the fact that so many of the claim forms represented groups of plaintiffs, for example, husband and wife, or husband and children, or variations of both. The claim forms were to be completed by each plaintiff to the lawsuit, but in most cases, a family of plaintiffs provided only one set of answers to the questions concerning when odors and

emissions were first encountered and the effects of the odors and emissions on the plaintiffs' quality of life; questions regarding exposure to toxic substances were answered similarly, with one set of answers instead of individually by each member of the family. The database reflects these inadequacies in plaintiffs' responses. (Table 9.)

Odors and Emissions

Only about a dozen of the plaintiffs responded that they smelled no unusual odor emanating from the Sewerage and Water Board treatment plant. Most respondents, however, complained of an odor coming from the treatment facility, and indicated that sometimes it was worse than others. The biggest complaint was that, on occasion, the odor forced the plaintiffs to move their barbecues and birthday parties indoors, and they were unable to enjoy their garden activities. Many of the respondents complained of soot, ash, film, and other residue on their cars and gardens; the soot or scum ranged in color from yellow to black to white, and in texture from a film to a powder, to an oily, sticky substance. Respondent #183 even blamed the Sewerage and Water Board treatment facility for the bird droppings that he noticed on his car while Respondent #9 suggested that the treatment plant caused a rat infestation on his property.

The answers relating to when the plaintiffs believed they were impacted by the odors and emissions from the Sewerage and Water Board treatment plant are so varied they are difficult to analyze and quantify. The report "Impact Date Prior to 1990" (Table 8.) gives a count based on the exact response written in the plaintiff claim form. Very few respondents reported an exact date; most mentioned early, late, or mid 1980s or 1970s. Some noticed the odors earlier than the emissions, but the answers are so general they are of little value in the database. For purposes of this study, however, it is clear that the odors and emissions began in the 1970s and 1980s.

Table 8.

*Impact Date Prior to 1990**Count by SWB IMPACT DATE*

1	1966	2	1986
2	1970	4	1987
1	1970/early 1980s	3	1988
8	1970s	3	1989
1	1970s/1980s	1	August 1988
1	1970s/O-??/E	1	early 1970s
1	1970s/O-1980s/E	4	early 1980s
1	1970s; Worse 1980s	18	late 1970s
1	1973	1	Late 1970s-1980s
2	1975	9	late 1970s/1980s
1	1978-1980S	5	late 1970s/early 1980s
12	1980	1	late 1970s/mid 1980s
114	1980s	1	late 1979
1	1980s-1993	7	late 1980s
1	1980s/O-1970s/E	1	late1970s/1980s-O/1980s-E
1	1980s/O-1973/E	3	mid 1970s
2	1981	1	MID 1970s/1980s
1	1982	15	mid 1980s
1	1983	1	mid1970s
5	1984	1	mid1970s/1980s
4	1985		

Total: 244

Source: Author

Toxic Exposure

Especially telling was the response to the question of whether or not the plaintiff had been exposed to toxic substances from the Sewerage and Water Board treatment facility. Only one respondent answered "yes;" one answered "no;" three "didn't know;" one was "not aware;" and, all the rest answered either "subject to expert testimony" or "STET," meaning subject to expert testimony. All of the responses in the database were inputted just as they were written on the claim form. The likelihood that close to five hundred people would respond "subject to

expert testimony" is unlikely; that phrase is just not in the vernacular of the general population. (Table 9.)

I assumed that the plaintiffs did not know the answer to the question regarding toxic exposure, at least with any certitude, so the interviewer just took it upon himself or herself to complete the answer for almost all of the plaintiffs; but, in doing so, the reliability of the entire claim form process is suspect. How many other questions did the interviewer answer or assist in answering and for how many plaintiffs?

Symptoms of Plaintiffs

A careful review of the claim forms indicated that the residents most often complained of burning eyes, sore throat, allergies, and respiratory problems as a result of living in close proximity to the Sewerage and Water Board treatment plant. (Table 10.) More people complained of allergies than anything else, 348 of the 429 respondents indicated that allergies were a problem for them; 81 people said they had no allergy problems. Three hundred eight (308) people had problems with burning eyes, but 120 people had no problems with burning eyes. Three hundred thirteen (313) plaintiffs experienced occasional sore throats, 117 people had no sore throat problems. At least 269 respondents complained of respiratory problems; 159 people had no respiratory problems at all. Again, it is important to remember that 80 of the 502 claim forms were not complete and had no information on plaintiff symptoms at all.

Thirty-six percent of the respondents indicated that they were smokers, i.e. 180 of the 502 responders were smokers; 372 respondents were non-smokers. It is interesting to note the number of smokers who attribute their burning eyes, allergies, and respiratory problems to the Sewerage and Water Board treatment plant; and it is also remarkable how many admitted smokers suffered no respiratory, allergy, burning eyes, or sore throat symptoms at all.

Furthermore, it is inconceivable that smokers with lung cancer, emphysema, bronchitis, asthma and shortness of breath blamed their illnesses on the treatment plant never recognizing their own culpability.

Other disparities in the database suggest interviewer intervention or error. For example, Respondent #151, a throat cancer patient and smoker, does not claim sore throat symptoms attributable to the Sewerage and Water Board plant, but Respondent #242, an Alzheimer's patient, attributes his burning eyes, sore throat, allergies, and respiratory problems all to the Sewerage and Water Board plant. Respondent #218, also an Alzheimer's patient, supplied no answers at all to the types of symptoms he experienced yet he was also made a party to the lawsuit. I suspect that Respondent #242 was more ambulatory than Respondent #218. Perhaps Respondent #242's family supplied the answers to his claim form and Respondent #218's relatives did not choose to answer the claim form on their relative's behalf. In any event, as time went by, and some of the elderly passed away, their surviving heirs were substituted as plaintiffs for the deceased.

After a careful review of the database, there is no evidence to suggest that the citizens of the St. Bernard neighborhood were exposed to any toxic emissions or substances that would cause serious illness or death. The symptoms, burning eyes, sore throat, allergies, and respiratory problems, such as shortness of breath, are relatively commonplace symptoms, present in the general population. There are literally hundreds of possible explanations for these symptoms in St. Bernard and in the general population.

Plaintiff Occupations and Work Environments

Twelve percent of the responding St. Bernard plaintiffs admitted that they had been exposed to chemicals either at home or on their job sites. The plaintiffs are mostly blue collar

workers. The men are plumbers, electricians, and refinery workers. There are nurses, secretaries, teachers, students, fishermen, welders, and custodial workers in the plaintiff group. Many of the plaintiffs are housewives or minor children; some plaintiffs are retired, some are unemployed, and some simply did not answer the employment question. (Table 11.)

Nearby refineries, Mobil, Kaiser, Tenneco, Shell, Murphy Oil, or Domino Sugar, are all mentioned as work environments. Plaintiffs reported more exposure to asbestos and second hand smoke than to any other chemical or toxic substance. What is especially interesting is the number of respondents who indicated that they had been exposed to chemicals but could not, with any specificity, identify the name of even one chemical they had been exposed to or explain their toxic exposure experience in any detail.

Unfortunately, the claim forms raised as many questions as they answered. As noted previously, it is clear that the forms were completed by someone other than the respondent; questions were skipped, left blank, or reworded by the interviewer. Some of the questions left blank were easy enough to answer. It is unclear whether the interviewer was not properly trained, the respondents refused to answer the questions for privacy reasons, or the respondent simply did not know the answer. It is possible that all of the above are true.

It is also clear from the database responses that some of the respondent answers are questionable. Respondent #247, for example, a college professor and United States Department of Agriculture employee, certainly would be able to describe, in detail, the nature of his chemical exposure. He also could have completed the entire claim form on his own without assistance from the plaintiff lawyers' staff. A closer examination of Respondent 247's answers reveals that there is no health information provided. In some of the cases where spotty information was

provided, these particular plaintiffs later dropped out of the lawsuit; some revealed that they did not even know they had been a party to the lawsuit.

Dates of Impact

A review of the table labeled "Symptom Dates" indicated that in almost all cases the plaintiffs' symptoms appeared after the Sewerage and Water Board treatment plant's operation began impacting the plaintiffs' lives. (Table 12.) Less than a dozen of the plaintiffs confirmed that their symptoms pre-dated the Sewerage and Water Board impact date. Most of the plaintiffs maintained that they still experienced symptoms. Some plaintiffs who no longer experienced symptoms indicated that their symptoms ceased around 1992 or 1993 or when they moved away from the area.

Again, it is important to notice that this question, the last complaint date, produced so many different answers that it is almost impossible to draw any inferences from the answers. There were a multitude of answers from each plaintiff. Not only that, sometimes a claim form had several different answers within space allocated for the answer. Plaintiff # 27, for example, reported that his last complaint date was 1993 but also reported that his symptoms were still occurring. The database entries reflect verbatim responses from each claim form; confusing and contradictory responses were included in the database to maintain the integrity of the database.

The Physicians

Plaintiffs were also asked whether or not any doctor had told them that their ailments were caused by their proximity to the Sewerage and Water Board treatment plant. (Table 13.) Only seven respondents said that their doctors specifically told them that their symptoms were caused by the treatment plant. The seven doctors identified on the plaintiff claim forms were well known in the area as many of the other plaintiffs listed them as their doctors as well. If the

doctors did believe that the Sewerage and Water Board was the cause of the ailments, it seems logical that more of the plaintiffs would have answered this question affirmatively. Perhaps these seven plaintiffs misinterpreted their doctors' remarks, or maybe they had described their symptoms, advised their doctors that they lived near the treatment plant, and asked if there could be any correlation between the plant's activities and their symptoms. The only way to know with any certainty would be to depose the seven doctors, and deposition costs are high. Attorney time, physician time, court reporters, transcripts, and copies of transcripts times seven, all add to the costs of defense and the costs have skyrocketed in this litigation.

Hysteria as Powerlessness

An analysis of the plaintiffs' work environments and their occupations may offer insight into their motivations in this lawsuit. Very few of the plaintiffs and/or claim form respondents were professionals. The claim forms had no question pertaining to level of education achieved, but the employment responses suggest that there were few respondents who had earned a college education. There were no doctors or lawyers among the plaintiffs and only a couple of accountants who may have been bookkeepers rather than certified public accounts. The litigation represents whole families, not heads of households, so there may be five or six people from each family identified as plaintiffs in this lawsuit; each plaintiff, no matter the age, has been given a separate ID number in the database.

Showalter's Hystories analyzes hysteria in a political framework and suggests that the symptoms of hysteria serve as a form of social protest. The residents did all they could to have the landfill closed. They organized, met with local officials, wrote newsletters, reported environmental infractions to the Louisiana Department of Environmental Quality, and signed

petitions, all to no avail. Their efforts fell on deaf ears. The landfill remained open and operational.

From my research and analysis, I believe that the lack of a public voice left them with no alternative but to articulate their economic, social, and political oppression through somatic symptoms. These somatic symptoms manifested themselves in the form of allergies, burning eyes, sore throats, and typical respiratory problems. Unconsciously, or maybe even consciously, the landfill, with its odors and flies, was making nearby residents sick.

The Culture of Hysteria

L. P. Boss' studies suggest that mass hysteria is a culture bound stress reaction manifested either by anxiety-related symptoms or by motor-symptoms such as hysterical laughing, convulsions, and pseudoseizures. The residents' symptoms in this case were not motor driven; rather, they were illustrative of the anxiety variant type of stress reaction: headaches, dizziness, respiratory problems, all socially acceptable symptoms. Boss, Goh, and others have documented the effects of the environmentally triggered hysteria outbreaks. If the exaggerated or imaginary fears associated with a mysterious odor could produce mass hysteria, it is not out of the realm of possibility that the landfill odor could do the same especially when the residents were so powerless to shut down its operation.

Furthermore, Boss was able to prove that the contagion of the epidemic is affected by the behavior of socially related people. The residents of the area were indeed socially related. They had formed a neighborhood organization whose main objective was to close the landfill. The odors and inconveniences associated with the landfill created a common bond for the neighbors, and the neighborhood organization solidified those bonds. The plaintiffs' symptoms, their fears, and their behavior all fueled the contagion of hysteria to epidemic proportions. Every cold, every

sore throat, every allergy and worse was attributable to the odors and emissions in their midst, and once the lawyers were brought in to help with the landfill closure, the stakes were raised to a new level. Retribution; someone was going to have to pay for the neighborhood's inconvenience.

The doctors Barsky and Borus' studies also support my understanding of hysteria in this case study. In their clinical work, their subjects initially appeared to be suffering from symptoms of infectious contagion from a toxic substance, but the epidemiological study revealed that the contagion was actually spread by interpersonal communication, acquaintance and familiarity of group members, and the subjects' close proximity to the exposure.⁶⁷ While allergies, burning eyes, and sore throats are not necessarily contagious, they can be once the power of suggestion and the stress and distress of living in the area became more apparent. The neighborhood meetings, the power of suggestion, and the lawyers' involvement helped perpetuate the sick syndrome and spread the hysterical contagion.

Hysteria as Stress

The neighbors' fears do not have to be legitimate for hysteria to take root. The fact that they could smell an unpleasant odor at times is enough to make many worry if the odors were indeed harmful. Their fears were real to them and as Barsky and Borus detailed in their studies, the amplification of the syndrome symptoms is facilitated by 1) the belief that one is sick; 2) the power of suggestion; 3) the sick role; and, 4) stress and distress.⁶⁸ All of these elements were present in the neighborhood gatherings and in the small talk over the fence, neighbor to neighbor.

The stress that Barsky refers to is not just the life changing kind of stress. It can be the every day stresses of life too, and all of the common recurring irritations in life. The odor and all

⁶⁷ Barsky & Borus, 912.

of the little inconveniences of life near a landfill and sewage treatment plant can become magnified. Mundane bodily symptoms, oftentimes ignored, are no longer discounted as ordinary, and the external stressors of life can also cause anxiety and depression and the somatic symptoms associated with each.

Hysteria and Property Values

Eventually, the fears and the stress create a sick building mentality. The residents' fears extended to their property values; most of the plaintiffs feared that their homes and property had been devalued because of their proximity to the landfill and the sewage treatment plant. A review of the table identified as "Property Values" offers a fascinating look at life in the plaintiffs' neighborhood. (Table 14.) While most respondents feared that their homes had been devalued because of the landfill and the sewage treatment plant, most did not want to sell their homes.

The "Property Values" table further supports the theory of hysterical contagion presented herein. Many of the plaintiffs claimed their health was impacted by their proximity to the sewage treatment plant. Even after the landfill closed, their symptoms continued and they maintained that they feared developing cancer or other serious illnesses because of the operations of the sewage treatment plant. Yet, most plaintiffs indicated on their claim forms that they did not want to sell their homes.

The claim forms clearly indicate that most of the plaintiffs claimed to be sick, feared contracting serious illness, and claimed to be impacted by odors, emissions, and maybe even toxic substances from the nearby sewage treatment plant. Based on their claim form responses, then, one would expect that most plaintiffs wanted to sell their property and move out of the

⁶⁸ Ibid., 914.

area. In fact, just the contrary was true; most of the plaintiffs reported that they did not want to sell their homes.

Some of the plaintiffs did not own their homes; they were renters or boarders, consequently, they were free to move to other areas where the threat of exposure was nonexistent. Many of the plaintiffs were the married children of other plaintiffs. Why did they marry and buy homes in an area that they thought was causing them physical harm? Why not move out of the entire area while they were moving out of the family domicile? Are the respondents being truthful when they indicate that the sewage treatment plant is making them sick? If so, why do the plaintiffs not want to sell their houses and move away? These kinds of responses raise questions about the truthfulness of the plaintiffs and the reliability of the claim forms in measuring plaintiff attitudes, symptoms, and responses.

While most of the plaintiffs believe their property has been devalued because of its proximity to the landfill and the sewage treatment plant, it is important to remember that this area experienced considerable flooding following Hurricane Betsy. Many of the plaintiffs who said their property did not flood moved into the neighborhood long after the hurricane. Perhaps they were unaware of the flooding and the hurricane damage in the area. Flooding significantly impacts property values.

Table 14 also indicates that most of the flood damaged homes were repaired by the owners themselves or by their friends and relatives. ([Appendix 7.](#)) Did they properly treat the studs and beams to retard mold growth? If they just ripped out the walls and sheetrock and did not treat the inside wood with mold killing chemicals, the mold could be growing behind the walls and ceilings. Mold could be responsible for the plaintiffs' symptoms; mold spores cause all kinds of respiratory problems, allergies, red eyes, and the like. Again, the incomplete and

conflicting responses on the claim forms will necessitate deposing all of the plaintiffs to get clarification. Depositions, court reporters, transcripts and copies, attorney time, staff time to read, summarize, and file the deposition summaries all add to the cost of trial preparation; and, multiply the cost of one deposition by the total number of plaintiffs in this lawsuit, and the costs of trial preparation become astronomical.

In reviewing the documents and minutes from the Arabi Civic Improvement Association, I discovered letters written by Plaintiff #200, complaining about the general appearance of the neighborhood and the number of code violations that were allowed to go unchecked by law enforcement officials. The letters document, with much specificity, the unsightly conditions in the neighborhood: trash and junk cars on properties, dump trucks and large tractor trailers on the streets and in driveways, mobile homes in back yards, and recreational vehicles blocking sidewalks. Plaintiff #200's letter dated September 13, 1991 ended with "we are letting the values of our homes decrease because no one cares to enforce the laws."⁶⁹ ([Appendix 8.](#))

In 1994, Plaintiff #200 literally drove around the Arabi neighborhood looking for junk or wrecked cars to report to authorities.⁷⁰ ([Appendix 9.](#)) The trash and junk car problems posed an ongoing problem for the neighborhood. Plaintiff #200 wrote another letter in October, 1994 to the councilman-at-large in St. Bernard reiterating his call for more law enforcement of code violations in the neighborhood.⁷¹ ([Appendix 10.](#)) In February of 1995, another letter was sent to parish officials, with a two page attachment documenting and describing every address in the area where an infraction was visible from the street.⁷² ([Appendix 11.](#)) Nevertheless, on his claim form, Plaintiff #200, who had sold his home by the time he completed his claim form,

⁶⁹ ACIA-0440-0442, Letter dated September 13, 1991.

⁷⁰ Steve Cannizaro, "Group Watches Out for Junk," Times Picayune, (2 August 1994), B-5.

⁷¹ ACIA-0697-0698, Letter dated October 24, 1994.

⁷² ACIA-0638-0640, Letter dated February 8, 1995.

maintained that the Sewerage and Water Board's plant was responsible for the decrease in property values to his home. (Table 14.)

In an article in the Times Picayune, Steve Cannizaro described Plaintiff #200 as a "junk car vigilante." Mr. Cannizaro also interviewed the chief administrative officer for St. Bernard Parish for the story who asserted, "We don't want to be like a Gestapo or something. We work with the people complaining as well as those who may be in violation..."⁷³ ([Appendix 9.](#)) The words "vigilante" and "Gestapo" suggest to me that Plaintiff #200 was on a mission; he was retired and spent his time driving the neighborhood looking for infractions and people to report, and then reported them to law enforcement authorities. His letters had a threatening tone, implying to those in authority that he would send copies of his letter to all of his like-minded friends if remedial action was not forthcoming.⁷⁴ ([Appendix 8.](#))

Plaintiff #200, with time on his hands and in a position of power is an important element in the hysteria theory I have suggested in this case study. This man is more than just a nosy neighbor; he goes on patrol, looking for infractions; his mission is to route out wrongdoing wherever he finds it and seek compliance. It is plausible, therefore, to infer that if a person documents, on a daily basis, the location of junk cars in the neighborhood, he would also seek redress if he thought the landfill and sewage treatment plant were not operating within the law.

Surely, on his daily outings searching for trash and junk cars, Plaintiff #200 had the time to stop along the way, talk to his neighbors, and rally support for the movement to close the landfill and rid the neighborhood of the dump's foul odors. Barsky and Borus' study offers clear and compelling evidence that the belief that one is sick, the power of suggestion, and the role of stress and distress all serve to amplify functional somatic syndrome.

⁷³ Ibid, Cannizaro.

⁷⁴ Ibid, ACIA-0442.

At this juncture, I would also like to add to Barsky and Borus' above mentioned premise; I suggest that the fear of reprisal can and does amplify the symptoms associated with the functional somatic syndrome. A "what would the neighbors think" mentality, so ingrained in small communities, can have serious repercussions for those who fail to take on the sick role and who remain healthy while those around them fall victim to the mysterious odor causing illness, especially if the major complaints are just runny eyes, sore throats, and allergies. Since every human being is susceptible to the common cold, it might have just been easier to become part of the neighborhood litigation movement with Plaintiff #200 and ascribe their common cold symptoms to some more serious malady.

The fact that Plaintiff #200 has the time and energy to document and publicize every minor code violation in his neighborhood indicates that he was a force to be reckoned with. The hard-working people of the area certainly do not have the extra time and energy needed to deal with Plaintiff #200 and his pre-occupations with righting wrongs. They leave the righting of wrongs to Plaintiff #200, but as neighbors, they certainly do not want to fall victim to Plaintiff #200's ire either. They go along to get along because it is probably the path of least resistance and the easiest thing to do. They certainly do not want to get on Plaintiff #200's list of those neighbors who have no problem with the landfill, and the database confirms that only a handful of residents would admit that they suffered no health problems whatsoever because of their close proximity to the dump.

These suppositions may very well explain how this litigation escalated to include so many plaintiffs and so many defendants. Perhaps a few neighbors admitted that they had red eyes or allergies every now and again and the powers that be in the neighborhood concluded that they would be a party to the lawsuit based on their occasional symptoms. This would explain why so

many people did not fill out the claim forms completely, why some who filled out the claim forms never became a plaintiff in the lawsuit, why so many people moved away, either not knowing they were parties to the lawsuit or requesting to be dropped from the lawsuit once they were located.

Garbage smells; and, the fact that the foul odor can be sickening, nauseating, and repulsive to the senses is indisputable. A one-man mission to get rid of junk cars is one thing; a mission to close the landfill would require a public rallying of support. Plaintiff #200 took his mission seriously, and with like-minded friends and neighbors, he was able to prevail, albeit with legal assistance, in the eventual closing of the landfill.

The Role of the Arabi Civic Improvement Association (ACIA)

As part of my research for this case study, I compiled an index on all of the documents provided to defense counsel from the Arabi Civic Improvement Association. (Table 15.) This table represents over eight hundred pages of documents from the files of the neighborhood organization. Each page of the index is identified by: page number (ACIA0001-0888), document date, document type, author, and addressee, and description of document content. The names of the plaintiffs and lawyers have been removed and are simply referred to by their plaintiff number or their lawyer number. The names of public officials, elected officials, and newspaper reporters appear without editing. Any footnote reference to an ACIA number is referenced in Table 15 in the appendix.

The index includes numerous letters, newspaper articles, meeting notices, agendas, neighborhood newsletters, and minutes of the monthly meetings. Usually there were guest speakers, door prizes, and refreshments at the monthly meetings. The organization's files also included copies of parish ordinances, health and sanitation codes, and the names and addresses of

those neighbors in violation of the parish codes. There were papers relating to the status of the environmental permits in the area, and information about the landfill application, operating practices, and permit; capital improvement plans, budgets for the area, and a monthly status report on all of the neighborhood complaints were all part of the organization's files.

For the most part, the neighborhood organization focused on the business of code enforcement and the closure of the landfill. Junk cars, litter and other code violations, and the smell of garbage consumed the business portion of the meetings. Those in attendance were constantly provided with telephone numbers to report violations. In the organization's July 1990 newsletter, for example, neighbors were given the emergency telephone number for the Louisiana Department of Environmental Quality and encouraged to call whenever they smelled garbage, noting the time and date of their call for the organization's records.⁷⁵ (Table 15.)

Plaintiff # 153, a 70 year old plaintiff, interviewed by a Times Picayune reporter acknowledged that she repeatedly called DEQ air quality officials on their emergency beeper begging them to come and smell the foul odor for themselves. Lawyer #1 was also quoted in this article, "From what doctors can tell, the scent causes an allergic reaction in Plaintiff # 153."⁷⁶ Credit is also due the news media for legitimizing plaintiff symptoms and lending credence to their argument that the foul odors were causing illness.

The Arabi Civic Improvement Association's March 1992 newsletter offers an excellent synopsis of this entire lawsuit. It begins, "Tired of being DUMPED on? Most residents are being affected by this noxious dump, whether we realize it or not...Because of it, many of us have developed health problems, or have existing conditions worsen...Our property values have

⁷⁵ ACIA-4-58 Newsletter, 7/7/90.

⁷⁶ Karen Turni, "Ailing Neighbor Blames Dump," Times Picayune, 27 January 1993, B3.

decreased."⁷⁷ So, it was not just word of mouth, or talk at the neighborhood meetings; the newsletters were also instrumental in spreading the fear and the contagion factor. As discussed earlier in the literature review, the power of suggestion and the perpetuation of the sick role, and even the belief that one might become sick are all powerful psychological factors that amplify somatic symptoms.

The newsletter provided another mechanism to attract more plaintiffs. If the neighbors did not feel sick, then perhaps the suggestion that property values had been affected might galvanize reticent neighbors into joining the lawsuit.

The BFI dump site stopped accepting garbage in March 1993; the ACIA's June 1994 newsletter notes, "what a relief to get rid of that odor!" It is important to note that all of the odor problems prior to the filing of the lawsuit were attributable to the landfill; no newsletter that I read, no letter to any public official, no ACIA document made mention of the Sewerage and Water Board treatment facility.

Again, Plaintiff #200 wrote many of the neighborhood newsletters and also wrote articles for the St. Bernard Voice. His tireless efforts to close the dump and to keep the neighborhood clean of debris and junk cars may have finally taken its toll on the neighbors' patience and good will. The March 21, 1996 meeting agenda, for example, written by Plaintiff #200 notes that he was putting his house up for sale and moving out of Arabi as soon as his house was sold. The "important thing is that we leave as friends."⁷⁸ The month before at the February 15, 1996 board meeting, the board resignation of Plaintiff #190 was discussed with no mention that Plaintiff #200 was leaving too.⁷⁹ What precipitated these hasty resignations and the subsequent moves away from the neighborhood is not clear; but, it is remarkable that someone so entrenched in the

⁷⁷ ACIA-46-47, Newsletter, 3/92.

⁷⁸ ACIA 0177-78, Agenda, 3/21/96.

business of neighborhood would resign his position of authority and move away from the neighborhood he loved so dearly.

⁷⁹ ACIA-0179, Agenda, 2/15/96.

CHAPTER V

THE ROLE OF THE PLAINTIFF LAWYERS

The powerlessness of the plaintiffs in dealing with the closure of the BFI plant moved them to employ legal representation. The plaintiff lawyers were powerful enough to organize the neighborhood; they helped the neighborhood document offensive odors and whether or not they had become ill or were in any way inconvenienced by the smells of operation of the nearby plants. Eventually, the landfill was closed. Had the plaintiffs been successful on their own merits in closing the landfill, had they been able to deal with the BFI plant on their own, it would not have been necessary to retain legal counsel, and the idea that they had become sick from the odors may never have crossed their minds. After all, the plaintiffs' symptoms do not represent serious illnesses; for the most part, the symptoms are common to the general population: runny eyes, sore throats, allergies, and respiratory problems.

This case study demonstrates that the plaintiffs' lawyers went beyond their initial charge. The attorneys were asked to provide legal expertise to the residents to assist them in mounting a campaign to close the landfill. The plaintiffs had no specific charges against the Sewerage and Water Board or its operation. The lawyers helped form a neighborhood organization to assess the neighborhood's complaints and grievances against the landfill. The Arabic Civic Improvement Association provided a forum for the lawyers to meet regularly with the neighborhood, gain their trust, and act on their behalf in having the landfill closed. Monthly meetings and newsletters kept the neighbors apprised of the lawyers' efforts; and, at each meeting and in each newsletter, members were asked to solicit new members to join the organization.

Working on their behalf, the lawyers began their field work, documenting any and all health claims, continuing to meet regularly with the neighborhood group, and providing updates

on their progress in forcing the landfill's closure. The lawyers' interest was perhaps not altruistic; for them to remain actively involved with the neighborhood, especially after the landfill closed, required some kind of payment for services rendered. Once the BFI landfill was closed, two more law firms joined the litigation against Browning Ferris Industries. These lawyers were experienced, successful class action attorneys; if they could not finance the lawsuit themselves, they certainly would be able to secure whatever financing was needed to cover the costs of prolonged litigation of this matter.

The lawsuits were filed seeking to compensate the residents for their civil and property damages and the more residents in the lawsuit, the larger the attorney fees if the plaintiffs prevailed. Likewise, the more defendants sued, the greater the potential damage award for the residents and their attorneys. The Sewerage and Water Board East Bank Sewage Treatment Facility (EBSTP) is located adjacent to the BFI landfill; the lawyers sued the Sewerage and Water Board, claiming that the neighborhood was impacted by the board's operations of the treatment plant. Particularly, the lawsuit alleged that the EBSTP "emits foul odors, particulates, and other hazardous substances into and on to the property of petitioners. Said odors, particulates and substances deprive petitioners of the liberty of enjoying their property, decrease the value of their property, and cause petitioners to suffer personal injuries while on their property."⁸⁰

([Appendix 13.](#))

Also sued was the Louisiana Department of Environmental Quality (LDEQ) for negligently permitting both facilities, the landfill and the Sewerage and Water Board treatment facility, failing to conduct an environmental impact study before permitting the landfill, and failing to monitor the operations of both facilities resulting in plaintiffs' personal injuries, the

⁸⁰ Palmer v. Browning Ferris, Inc., No. 63-145 (La. 34th JDC 1990).

liberty to enjoy their property, and for the decrease in the plaintiffs' property values.⁸¹ More defendants were added to the litigation as time progressed in the hope of buttressing expected settlement proceeds.

Consequently, the more neighbors who could be convinced that the odors and emissions were harmful, the more plaintiffs there would be in the lawsuit, and, even more important to the lawyers, the greater the overall compensation awards. Lawyers involved in litigation with multiple plaintiffs, do not work on an hourly basis. Instead, the legal fees are usually based on contingency fee contracts with the attorneys receiving a percentage of the settlement proceeds. Customarily, the contingency fee ranges are between one-third and 40% of the total settlement. So, the more plaintiffs in the lawsuit, the higher the legal fees would be.

The Arabi Civic Improvement Association's documents provide convincing evidence that the neighborhood had a problem with the landfill. They did not like the traffic, the dump trucks, the flies, the debris, or the odors coming from the landfill. They wanted the dump closed and they had to hire legal counsel to get it closed. There is nothing in the organization's files to suggest that the residents felt that they were adversely impacted by the operations of the EBSTP. The neighborhood's June 1993 newsletter reiterated that since garbage dumping had been terminated the previous month, the residents were now "able to enjoy being outdoors without the stench of 'eau de dump.'"⁸²

The same newsletter touted a status report on the "multiple plaintiff action against BFI" planned for the June meeting. Every month, month after month, Lawyer #1 attended the neighborhood meetings, providing updates on the progress of the lawsuit. Monthly newsletters kept the neighborhood abreast of the happenings in the area, the numbers to call to report

⁸¹ Ibid.

⁸² ACIA 7-8, June 1993.

potholes, junk cars, and any other eyesores or suspicious activity. The newsletters encouraged members to attend and bring new members with them. In January 1995, for example, members were notified of a chance to win \$50 for bringing a new member to the meeting.⁸³ Even more disturbing, the 1996 roster of paid members and non-renewed members also included the names of those members "too poor to pay dues."⁸⁴

It is troubling to think that the lawyers may have taken advantage of the neighborhood's plight. Were these people vulnerable to the attorneys' overtures? They wanted the dump closed. They were tired of the inconveniences and the odors of the landfill. Some of these people, by their own admission, were poor. The residents felt powerless in their efforts to get the landfill closed and sought legal assistance to help them in their efforts. The doctors Barsky and Borus suggest that the somatic syndrome becomes amplified in situations of stress and distress and by the power of suggestion.⁸⁵

Why did the lawyers stay on after the landfill closed? Why did their numbers increase? The lawyers of yesteryear, the lawyer-statesmen of the past as discussed previously, would have viewed their role as mediators, investigators, and negotiators between the various agencies and their clients. The result would have been a quest for the truth; a righting of wrongs; perhaps even an offer of compensation for damages and legal expenses incurred should any wrongdoing be ascertained. But there is a growing trend in today's legal environment to practice law as if it were a big business. The lawyers in this case study, from my perspective, have not behaved like the counselors of law in the past; on the contrary, they appear to be big businessmen looking for big profits.

⁸³ ACIA 19, October, 1995.

⁸⁴ ACIA 68-107, 1965.

⁸⁵ Barsky & Borus, 914-916.

The documents of the Arabi Civic and Improvement Association offer some insight as to the motivations of the lawyers in this case study. Lawyer #1 appeared as a guest speaker at the organization's meetings on numerous occasions. He offered updates on the progress of the landfill closure and the proposed lawsuit, conducted the organization's election of officers and swearing in ceremonies, and on a number of occasions even provided refreshments for the meeting. Lawyer #1 enjoyed somewhat of a celebrity status among the blue collar workers. As membership in the organization dwindled, Lawyer #1's presence was used to lure attendees to the monthly meeting, a fact made reference to in an agenda document stating: "a report or letter from Lawyer #1 would make this meeting attractive." ⁸⁶

Lawyer #1 used meeting time to discuss the progress of the litigation. Litigants were asked to bring their claim forms to the meeting or to send them directly to Lawyer #1's office. At the April 1995 meeting, Lawyer #1 asked if all members had been interviewed by his assistants;⁸⁷ at the October 1995 meeting, he asked for volunteers to testify in court and told the membership that he expected the case to go to court in 60-90 days; and, at the same meeting he encouraged other residents to join the lawsuit, making it clear that it was not necessary to be a member of the organization to be involved in the lawsuit.⁸⁸ I cannot comprehend how an officer of the court could tell these residents that the case was expected to go to court in 60-90 days; almost twelve years have elapsed since that meeting and this case has yet to go to trial.

After careful review of the neighborhood organization's files, it is also interesting to note that Lawyer #1 and his father, Lawyer #2, were the only lawyers who appeared at the meetings of the Arabi Civic Improvement Association. The other lawyers of record are never mentioned in the ACIA file documents. I think that the cultivation of clients was left to Lawyer #1 and Lawyer

⁸⁶ ACIA 187, 8/8/94.

⁸⁷ ACIA 0139-0142, 4/12/95.

#2; the other lawyers in the case perhaps helped with financing the litigation, ongoing discovery, and pre-trial court appearances.

It is important to remember that this lawsuit was filed in 1990 and consolidated with a similar lawsuit filed in 1991. As late as 2000, the plaintiffs' attorneys were still supplying claim forms and updating others with medical authorizations, affidavits, and notarizations. Plaintiff lawyers had difficulty even locating many of the plaintiffs listed in the petition. Many had moved away, certified letters trying to find them had been returned, several plaintiffs had passed away, and many others no longer wished to be included in the lawsuit. Counsel for plaintiffs asked for patience from defense counsel; they needed more time to locate people and determine their interest in remaining a party to the lawsuit.⁸⁹ ([Appendix 14.](#))

Defense counsel were more than patient. ([Appendix 15.](#)) The daily letters updating all counsel of record on the status of one or more plaintiffs was a time consuming task that generated scores of paperwork, filing, and copying. Defense counsel, in my mind, were more than patient; but then again, why not? They were billing by the hour. It didn't matter how many letters, faxes, or time was involved in determining who was or was not remaining a plaintiff in the lawsuit; defense counsel were billing by the hour or at least by the quarter hour, at hourly rates of \$140 an hour or higher. Would they have been that patient with ten years of plaintiff file addendums if they were paying the bills for time and copies out of their own pockets? I think not.

The Slippery Slope to Dishonesty

As Lisa Lerman suggests in "The Slippery Slope from Ambition to Greed to Dishonesty: Lawyers, Money, and Professional Integrity," there are specific "greed triggers" for lawyers: 1)

⁸⁸ ACIA 0675, 10/11/95.

the desire for money; 2) the desire for status, manifested as competitiveness among partners within the firm and accompanied by a desire for status outside of the firm, 3) declining loyalty; 4) opportunity; 5) firm culture; and, 6) lawyer rationalization.⁹⁰ It was during the discovery process in the offices of the Sewerage and Water Board Environmental Affairs Office that I was able to witness, first hand, the "greed triggers" discussed herein.

Lawyer #3's law firm participated in the production of documents at the Environmental Affairs office located on Florida Avenue. The Office of Environmental Affairs consists of a reception area, a director's office, a large open office with 8 desks, and a small conference area off the main office area. There are book cases along the walls and over thirty, four drawer, file cabinets in the center of the room that house the offices' files. There are also bookshelves in the reception area and in the director's office. All of the bookshelves are packed with books, hard bound, soft cover, large binders, large notebooks, huge spiral bound books, comprehensive planning books and budgets, telephone books, calendars, reference materials and all manner of personal effects, much like one would expect to find in any large office.

Lawyer #3 sent over one of his attorneys and an environmental expert to read through all of the documents and books produced during the production of documents at the Sewerage and Water Board's environmental office. The protocol was for me to take both men into the office before the production of documents began, let them view the logistics of the office, and then to escort them to a private meeting room for the duration of the document review. They were not allowed back into the Environmental Affairs office nor were they permitted to enter any other room in the building other than the men's restroom. All of the discovery stipulations were worked out in advance; counsel for Sewerage and Water Board made it clear that the production

⁸⁹ Letters from DeJean

⁹⁰ Ibid. Lerman, 909-912.

of documents should, in no way, interfere with the daily operations of the Sewerage and Water Board employees. There was to be no roaming of the hallways or talking with Sewerage and Water Board personnel.

Declining Loyalty and the Desire for Status

I was to bring the contents of the file cabinets, one drawer at a time, into a conference room on the other side of the building for the attorney and the expert to read and review. Neither the attorney nor the environmental expert was to write on any document or make any notes during the process. They were only allowed to tag for copying the documents of interest to them; two copies would be made of each document tagged for further review: one copy for the plaintiffs, and the other copy, for the Sewerage and Water Board's attorneys.

At least ten of the file cabinets in the middle of the room contained commercial and industrial customer account files. The Sewerage and Water Board insisted that these customer files were protected by the privacy provisions of the Louisiana State Constitution and refused to turn these files over to plaintiff attorneys voluntarily and/or without a signed protective order. My instructions were explicit. I was to bring the plaintiffs' representatives documents to review, one drawer at a time; the documents were to be kept in order, and returned to the same drawer, and to the exact same place within the drawer. All of the documents that the attorney and expert marked for copying would have to be read by me, summarized, and indexed, page by page, and submitted to the attorneys for the Sewerage and Water Board for their review and inspection.

I was to keep a watchful eye on the proceedings to ensure that the men stayed in the room, did not take any documents with them, make any notes, or take any pictures. Since it was estimated that the men would be at the Sewerage and Water Board several weeks, these ground

rules were set up to expedite the process and to maintain the integrity of all the Sewerage and Water Board's documents.

The attorney and the expert arrived promptly the first day. I met them on the first floor and escorted them to the Environmental Affairs office. We stepped into the room and they were to view the office, for a few moments, from the reception area. Once inside the door, however, the attorney pulled out a camera to take pictures of the office; I asked him not to take the pictures as I had been told the men were just to mark pages for copying and that was all. The instructions, to me, had been emphatic. The associate attorney complied, without incident, and I thought nothing more of the exchange.

The first few days, the attorney and the expert spent twenty or more hours reviewing the documents in just one drawer of one file cabinet. I stacked the files in orderly piles, and the two men read them, file by file, sticking post-it notes on those earmarked for copying. I was careful to restack the files, in alphabetical order, so that they could be returned to the cabinets in the same way that they had been removed. The process was cumbersome and physically demanding. Back and forth throughout the day carrying armloads of files and returning them to the proper place within the file drawer. These were all working files used in the daily operations of the environmental office.

The two men and I exchanged pleasantries each day but there was little conversation in the room. I was either going back and forth pulling files or reading and indexing the ones the two men had marked for copying. Only two or three days after production of the documents had begun, I returned to the conference, with an armload of files, only to find the attorney standing up over the table, and trying to take a picture of one of the documents and the expert making notes. I asked them to please stop as it had been agreed in advance that there would be no note-

taking, marking of documents, etc. and I felt that taking pictures was not authorized either. They were insistent, almost mocking, and insisted that since they were going to get copies anyway, it was ridiculous that they could not take pictures of whatever they wanted.

I felt it necessary to call for support and/or authorization for the picture taking to continue; unable to reach outside counsel for the Sewerage and Water Board, I telephoned the legal department of the Sewerage and Water Board for clarification. The attorney at the Sewerage and Water Board spoke with the plaintiff attorney on site and asked that he refrain from making any notes during the discovery process; he was to review the files and flag whatever he wanted to be copied. The associate attorney was not happy about this procedure and promptly called Lawyer #3 to report the problem.

Lawyer #3, enraged, called the board attorney and lectured him on the nature and extent of the discovery process, the provisions of the Louisiana Code of Civil Procedure, his relationship with the mayor, his concern that the Sewerage and Water Board was interfering with the lawful production of discovery and he threatened possible sanctions against the Sewerage and Water Board for abusing the discovery process. The board attorney suggested two alternatives to Lawyer #3 pending clarification of the discovery process: 1) continue to flag the documents that they wanted copied and make no hand written notes whatsoever, or 2) suspend the discovery process, until a later date, pending clarification and resolution of this issue between all counsel of record.⁹¹ ([Appendix 16.](#))

Needless to say, Lawyer #3 was irate. I was instructed to shut down the discovery proceedings for the day pending further clarification of the discovery process. In the end, plaintiff attorneys agreed to the process. The production of documents at the Environmental

⁹¹ Memorandum from SWB to RB

Affairs office began in early June and lasted until mid-September. In all, over 18,000 documents were tagged for copying. A private copying firm, eventually, set up a satellite office in the conference room; the copying and the numbering of documents began onsite.

The Sewerage and Water Board was forced to pay for 18,000 copies of documents that the plaintiff attorney marked for copying and they also had to pay the costs for a paralegal, on site, to index all of these documents. Moreover, the attorney and the expert insisted that every book on every bookshelf had to be brought into the conference room so that they might review any handwritten notes in the books. Even the telephone directories had to be brought down the hall and into the conference room for their review; and, a copy of the front of each book had to be made for the plaintiff attorney's review of all of the books available to the Sewerage and Water Board employees.

As a researcher, it was fascinating to witness the plaintiff lawyers' slippery slide from ambition to greed to dishonesty as it is characterized by Lisa Lerman in her recent law review article. The contrasts between Lawyer #3's actions and behavior and the civil service attorney's actions and behavior are quite telling. Had Lawyer #3 been a lawyer-statesman of yesteryear, he would have been able to instruct his associate attorney to continue the discovery process, refraining from making notes and taking pictures, until the Sewerage and Water Board's outside counsel could be consulted regarding the procedural matters.

The "greed triggers" can be analyzed as they relate to plaintiffs' counsel at this juncture. Setting aside money as the #1 motivating factor, the #2 factor, desire for status is relevant in this analysis. Lerman notes that it is not just status that manifests itself as competitiveness among partners that is at issue; rather, it is also the desire for status outside of the firm that serves as a "greed trigger." Lawyer #3's tirade with the board's staff attorney showed a total lack of

deference to another member of the bar; and, it was indicative of the declining loyalty within the legal profession.

Lerman maintains that this declining loyalty within the legal profession and the desire for status, both inside the law firm and outside the firm in the general community are both risk factors that push a lawyer beyond ambition to greed and ultimately to dishonesty. The civil service lawyer was only trying to suspend discovery until the Sewerage and Water Board's outside counsel could discuss and attempt to resolve issues of discovery procedures with the plaintiffs' attorneys. When Lawyer #3 began to lecture the civil service attorney on the rules of discovery and to tout his relationship with the mayor, he went beyond the bounds of the lawyer-statesman model of prudence and public-spiritedness. Kronman's model of "The Lost Lawyer" is typical of Lawyer 3's condescension and rudeness to a fellow member of the bar.

Opportunity, firm culture, and lawyer rationalization are also triggering factors of greed according to Lisa Lerman. I will offer another example of the plaintiff lawyers' slippery slide from ambition to greed to dishonesty as it relates to the associate attorney and the environmental expert assigned to review the documents in the Sewerage and Water Board's offices. As discussed earlier, during my first meeting with both men, I brought them into the Environmental Affairs office. They did not venture into the main office area where all of the desks and file cabinets were located in the middle of the main office. They stood in the reception area and only looked around the large office.

Once the attorney and the expert had read through all of the documents from all of the pertinent file drawers, I proceeded to bring every book on every bookshelf in the main office and the adjoining meeting room into the conference room for their review. The books were thumbed through, copies were made of every cover, and excerpts of some of the books were also copied.

When I had finished emptying and replacing all of the pertinent file drawers and every shelf on every bookcase, the discovery process was to be concluded, but the two men were not satisfied.

Opportunity, Firm Culture, and Lawyer Rationalization

The associate attorney and the environmental expert could not believe that they had reviewed all thirty or more file cabinets. I advised them that they had except for the cabinets containing the commercial and industrial customer account records. The two men wanted to see all of the customer records, but when I told them I was not authorized to look through those files, they did not insist and left for the day, without incident. Several days later, the associate attorney sent a letter to the Sewerage and Water Board's outside counsel, indicating that they were entitled to look through all of the customer service account records because the Sewerage and Water Board had waived any objection to such review when I allowed them to look through the file cabinets on their very first visit to the office, during their initial viewing of the Environmental Affairs office.

This particular incident clearly illustrates how the last three triggering factors of greed lead down Lerman's slippery slope of ambition to greed to dishonesty. The associate attorney, not long out of law school, thought he had the opportunity to circumvent the system in place for viewing the documents. He knew that I was not a full time Sewerage and Water Board employee; I was a contract employee of the Sewerage and Water Board's outside counsel whose job was to provide staff support for this litigation. The associate attorney knew I did not go into outside counsel's office regularly as I was in the conference room at the Environmental Affairs office day after day, all day, for months, reviewing documents with them. He may have assumed that he could bluff his way into reviewing the customer account files and no one would question his argument.

By suggesting to outside counsel that the Sewerage and Water Board had waived its objection to the review of the customer account records, the associate attorney hoped to create an opportunity to view the protected files. Besides the opportunity, his firm's culture was such that you could do whatever was necessary to develop evidence to support your case. They were willing to push the limits and even embellish the truth when necessary. After all, the young associate was aware of Lawyer #3's tirade with the staff attorney at the Sewerage and Water Board when he had tried to take pictures and make notes during discovery.

Being in the same conference room, all day, every day, for weeks on end, I became privy to conversations between the associate and the environmental expert. Although I stayed busy, reading and indexing all of the documents marked for copying, I could not help but hear their conversations. We worked every day at the same conference table, albeit at different ends of the same table. It was clear that the associate attorney and the environmental expert were both impressed with Lawyer #3's legal acumen, his money, his flashy cars and homes, his political influence, etc. Apparently, Lawyer #3 flaunted his wealth and his influence within the firm and hosted many a social event in his home and elsewhere, inviting elected officials and other prominent people in the community.

Given the firm culture and the associate attorney's rationalization process, the young lawyer hoped to gain access to the customer account records any way he could. It was clear that he wanted to move up in the firm and take on more responsibility. This example of the associate's ambition offers convincing evidence of what Lerman describes as the slippery slide from ambition to greed to dishonesty. There is not the slightest chance that the young associate misunderstood or mischaracterized what happened at the initial viewing of the Sewerage and Water Board's environmental office. He did not step foot into the main office area; he did not

open any file cabinets; he did not look through any customer account files. To maintain that he had and that the Sewerage and Water Board had waived its objection to reviewing the customer accounts was misleading. It is alarming to see young lawyers, fresh out of law school, inculcated into the culture of lawyer greed so early in their careers, but it certainly is a byproduct of the firm culture, the opportunities that present themselves, and the lawyer's own rationalization. Defense Counsel #2 did not permit the lawyers to review the files without a protective order and diplomatically addressed this issue in a letter to Lawyer #4, dated July 31, 1998.([Appendix 16.](#))

Once complete, the index of documents copied from the Environmental Affairs office was 100 pages long. It followed the same format as all the other indexes: document number (EA 001-18000), document date, document type, author, and addressee, and description of document content. The Environmental Affairs office was one of many different Sewerage and Water Board offices that produced documents to plaintiffs' attorneys for their review.

The production of documents was an expensive, time-consuming task that cost the Sewerage and Water Board hundreds of thousands of dollars in defense expenses; and these expenses went far beyond the board's ability to limit or control. Incredibly, the Sewerage and Water Board has spent well over a million dollars defending itself in this lawsuit; and, it is not surprising that there are many more similar kinds of lawsuits against this one particular quasi-public governmental body in the courts today. Extrapolating the costs associated with this agency's defense to other governmental agencies involved in similar multi-plaintiff litigation, it becomes clear that the costs of litigation are crippling to public agencies, mandated by law to provide services to the public. In the end, it is the taxpayer who pays the costs of litigation.

CHAPTER VI

CONCLUSION

The body of evidence presented in this case study clearly demonstrates that the Arabi plaintiffs did not consider Browning Ferris Industries a good neighbor. Disgusted by the smell of garbage, the flies, the rats, the airborne debris emanating from the Crescent Acres Landfill, the residents of the area launched a grass roots campaign to have the landfill closed. Community leaders mobilized neighborhood support, wrote letters to elected officials, and made repeated telephone calls to the Louisiana Department of Environmental Quality to complain about the putrid smell emanating from the landfill. In spite of all their efforts, the landfill remained open and operational.

The neighborhood leaders pressed on, undeterred by their initial failures to close the landfill; they retained legal counsel to represent them and the legal assistance did not end once the landfill was closed. On the contrary, two more law firms joined the legal forces, and the battle against the landfill quickly escalated to a war in the courtroom with the blame for every runny nose and allergy problem attributable to plaintiffs' close proximity to not just the landfill but the nearby sewerage treatment plant and the Louisiana Department of Environmental Quality.

Herein lies the answer to the question posed at the beginning of this case study: how does a neighborhood "stink" case turn into major litigation costing millions of dollars? Simply put, it was the effects of the interaction between the neighborhood residents and the lawyers. The lawyers were able to organize the neighborhood into a cohesive group sowing the seeds for mass sociogenic illness or neighborhood hysteria. The stress and distress of living near the neighborhood nuisance, the odor complaints, the power of suggestion and the fear that the odors

were noxious odors capable of causing serious illness were all factors that contributed to the amplification of symptoms and the perpetuation of the functional somatic syndrome.

There was never any evidence in any of my research that the neighborhood faulted the Sewerage and Water Board treatment facility for causing any inconvenience, smelly or otherwise. The neighborhood problem was always with the landfill and the junk cars. But for the lawyers, the Sewerage and Water Board might never have become a party to this litigation.

The addition of more plaintiff lawyers to the litigation raised the stakes considerably. With so many lawyers involved, there would have to be a large number of plaintiffs for the litigation to be financially rewarding; and, adding more defendants to the lawsuit would increase the settlement proceeds as well. The tactical maneuvers outlined in this case study suggest that the lawyers were instrumental in developing the litigation and guiding it through the discovery process and the pre-trial proceedings. Unlike the lawyers-statesmen of yesteryear, motivated by truth, justice, and public-spiritedness, these lawyers appeared more motivated by ambition and profit.

The financial implications to a public agency when confronted with such adversaries are overwhelming. Andrew Blum in his 1988 article, "Lawsuits Put Strain on City Budgets," identified several factors leading to the rising costs of litigation for local governments. Interestingly enough, many of these factors are applicable to this case study. The loss of immunity from civil lawsuits under the doctrine of sovereign immunity, greater awareness among the general population of their civil rights due to television and the media, the general litigiousness of our society, fee incentives to plaintiff attorneys under the Civil Rights Act section 1988 encouraging them to sue public sector entities, the perception that any

governmental body is a "deep pocket defendant" and the general tendency of people to like to sue the government were all factors in bringing this matter to the courts.⁹²

Alan Myerson suggested other causal factors for rising litigation costs against government entities including the zealousness of trial lawyers, sometimes even fraudulent zealousness, and a growing tendency for citizens and/or juries to use the courts for redress from governments that have cut services.⁹³ Susan MacManus and Patricia Turner in their 1992 survey asked respondents from 234 jurisdictions to identify from a list of 22 factors those which "most contributed to their jurisdiction's rising litigation costs."⁹⁴ Table 16 offers some illuminating insight on the contributing factors to rising litigation costs for local jurisdictions.

Table 16

Factors Contributing Most to a Jurisdiction's Rising Litigation Costs, 1991-1993 (in percent)

Cost Increase Factor	All	Litigation Impacted a Lot on Local Government Budget	Litigation Costs Increased over 10 Percent, 1992-1993	Litigation Costs Increased over 30 Percent, 1992-1993
Attorney salaries	26.6	25.0	23.7	16.3
Increased caseload	45.4	56.8	57.9	60.5
Increased case complexity	41.7	61.4	57.9	48.8
Lengthy appeals	13.3	15.9	15.8	16.3
Greater need to rely on outside counsel	48.2	63.6	63.2	55.8
Increase in frivolous cases	48.2	45.5	42.1	46.5
Increased cost of law journals/books	11.5	6.8	2.6	0
Liability insurance for legal personnel	2.3	2.3	0	0
Federal court rulings	19.7	15.9	13.2	16.3
State court rulings	19.7	15.9	13.2	20.9
Federal mandates	18.3	13.6	15.8	11.3
State mandates	22.9	27.3	31.6	20.9
Jury awards	11.5	11.4	7.9	7.0
Court reporting costs (reporter; transcripts)	10.1	9.1	10.5	11.6
Increased reliance on expert witnesses	21.6	29.5	31.6	30.2
Higher incidence of employee suits	39.0	38.6	42.1	44.2
Higher incidence of contractor suits	9.6	9.1	10.5	11.6
Higher incidence of private citizen suits	34.9	38.6	36.8	39.5
Increased in number of attorneys involved in each case	15.2	20.5	21.1	25.6
Increase in number of adverse rulings	7.8	11.4	13.2	11.6
Increase in travel costs	2.8	4.5	5.3	4.7
Increase in number of cases attacking local revenues (taxes, fees)	9.2	11.4	13.2	4.7
Other*	13.3	18.2	18.4	18.6

Notes: Respondents were asked, "Which of the following factors have most contributed to your jurisdiction's rising litigation costs over the past three years?" (Check all applicable)

* Other factors included: increasing insurance rates; increasing deposition costs, witness fees, courtroom exhibits, and attorney fee awards; and other miscellaneous categories.

Source: Survey of members of the National Institute of Municipal Law Officers, August-October 1992, designed by Susan A. MacManus, University of South Florida, Tampa.

⁹² Andrew Blum, "Lawsuits Put Strain on City Budgets," *The National Law Journal* 10 (16 May 1988): 32-33.

⁹³ Allen R. Myerson, "Soaring Liability Payments Burdening New York," *New York Times* (29 June 1992), B1, B2.

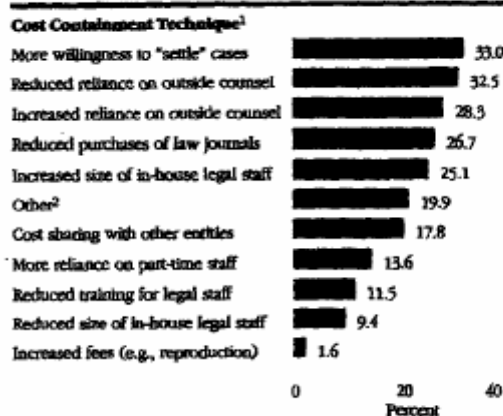
For example, 48.2% of the jurisdictions surveyed blamed the increased costs of litigation on the increase in frivolous cases; another 48.2% claimed that the greater need to rely on outside counsel contributed to their jurisdiction's rising costs of litigation. 41.7% of the jurisdictions noted that their caseload had increased in complexity; 39.0% reported a higher incidence of employee lawsuits and 34.9% reported a higher incidence of private citizen suits. 26.6% of the jurisdictions indicated that attorney salaries caused higher litigation costs in their locale and 21.6% identified reliance on expert witnesses as a contributing factor of rising litigation costs.

Several years ago Shawn Tully outlined a number of cost containment techniques used by the private sector to control litigation costs. Some of these techniques included sharing legal services such as taking depositions and writing briefs, greater reliance on in-house counsel, or in some cases, reliance on outside counsel to cut costs. Blum, in his study of public sector litigation costs mentioned the practice of settling cases just to save money.⁹⁵ MacManus and Turner compiled a list of cost containment techniques in their local government study (Figure 3) and the most common cost containment technique cited by one-third of the respondents suggests that most jurisdictions are more willing to settle cases, even frivolous ones, just to minimize litigation costs.

⁹⁴ Susan MacManus and Patricia A. Turner, "Litigation as a Budgetary Constraint: Problem Areas and Costs," Public Administration Review 53, no. 5 (1993): 462-472.

⁹⁵ Ibid, Blum.

Figure 3
Litigation Cost Containment Techniques Used by
Local Governments, 1991-1993

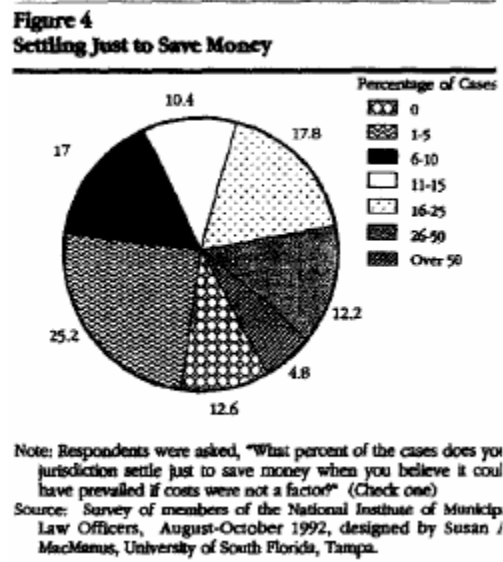


¹ Respondents were asked, "Which of the following litigation cost containment techniques has your jurisdiction used over the past three years?" (Check all applicable)
² "Other" included increasing insurance rates, increasing deposition costs, witness fees, courtroom exhibits, and attorney fee awards.
Source: Survey of members of the National Institute of Municipal Law Officers, August-October 1992, designed by Susan A. MacManus, University of South Florida, Tampa.

Other cost-cutting measures to minimize litigation costs included reducing the costs of law books and journals, relying more on part-time support staff, and increasing the reproduction costs in large scale litigation. The MacManus/Turner article explains the seeming conflict over whether it is more cost effective to use in-house or outside counsel as a jurisdiction-specific issue; almost equal percentages of jurisdictions, regardless of size, used both in-house and outside counsel depending on the particular case.

Even more troubling about this survey is the number of jurisdictions that settle lawsuits just to save money even when they know they can prevail at trial. Figure 4 addresses this issue nicely. 81.4% of the jurisdictions acknowledged that they settled "winnable" cases in an effort to cut costs; 45.2% of the respondents settled over 10% of their winnable cases and 17% of the jurisdictions settled over 25% of their cases to save money. Those jurisdictions who settled to

save appear to be smaller jurisdictions (below 100,000 people) that had experienced some budgetary impact associated with litigation costs.⁹⁶



Even more disturbing is the fact that MacManus and Turner noted significance in the relationship between propensity to settle cases to save money and the reported increase in frivolous lawsuits. According to Black's Law Dictionary, "A pleading is 'frivolous' when it is clearly insufficient on its face, and does not controvert the material points of the opposite pleading, and is presumable interposed for mere purposes of delay or to embarrass the opponent. A claim or defense is frivolous if a proponent can present no rational argument based upon the evidence or law in support of that claim or defense."⁹⁷

While MacManus and Turner did not find the relationship between settling to save and frivolous lawsuits to be statistically significant, the relationship was headed in the expected direction, more settling to save with the increase in number of frivolous lawsuits filed. Nearly 63.6% of the jurisdictions settling over half of their cases to save costs reported increases in

⁹⁶ MacManus and Turner, 469.

⁹⁷ Henry Campbell Black, Black's Law Dictionary with Pronunciations 6th ed. (St. Paul: West Publishing, 1990) 668.

frivolous lawsuits as a major cost-contributing factor whereas 15% of the jurisdictions settling to save experienced only a 38.4% increase in frivolous lawsuits in their jurisdictions.

The MacManus-Turner survey conservatively estimated that litigation costs for public agencies amounted to well over \$8 billion dollars in fiscal year 1991 for U.S. cities and counties. The most troubling cost contributing factor from a budgetary perspective was the high incidence of frivolous lawsuits filed against cities and counties that use the "settling to save" approach. Even more alarming is the revelation that settling cases to save money may, in fact, increase the likelihood of frivolous lawsuits being filed.

Indeed the outlook appears grim for many jurisdictions saddled with these multi-plaintiff lawsuits financed by teams of plaintiff lawyers with deep pockets. Most local agencies, like the Sewerage and Water Board of New Orleans, do not have the financial means, the expertise, or the support staff to mount an effective defense against such grand scale litigation. Their options are limited but well worth implementing.

Several proactive steps can be taken to address the growing challenges posed by high cost litigation. Government liabilities can be managed through the education of the public administrators, the public at large, and the education of elected officials. Environmental audits can be conducted of government agencies to pinpoint areas in need of environmental strengthening. These audits can be ongoing and will help a public administrator identify and control hazardous substances located at government facilities.

Public administrators should be continually educated about their responsibilities and the liabilities of their agencies; likewise, managers must make every effort to ensure that their employees keep current about changing environmental laws and challenges. Actions taken to address environmental problems should be well documented, noting the actions taken, the

rationale behind the action, and the individuals consulted to address the environmental issues. The importance of precise recordkeeping should be stressed because well kept records are invaluable in defending lawsuits.

Rosemary O'Leary suggests that the wisest thing a public administrator can do is to use the budgetary process as a defense mechanism.⁹⁸ She explains that when a public manager requests monies from the budget to address environmental issues, the effect is not just to go on record as being aware of the environmental concerns; the request also serves as a paper trail to establish the fact that appropriate steps have been initiated to acquire the funding needed to address the environmental issue.

Government agencies or quasi-governmental agencies such as the Sewerage and Water Board need to hire competent, trained, and qualified employees and pay them salaries commensurate with the private sector. As MacManus and Turner suggested, the ability to hire part-time personnel to assist permanent employees would greatly enhance performance and limit the need to hire outside counsel to defend costly litigation. An active public relations department to educate the public and keep them informed is also vital to the development of good relationships between the public agency or the Sewerage and Water Board and the citizenry it serves.

A good public relations blitz should be in place to notify the public concerning leaks, excursions, and/or any other negative impact of water, sewer, or drainage service to individual homeowners. Perhaps educational campaigns could be developed for the schools. Cox Cable free programming or the distribution of informative literature could further enlighten the public on issues of importance. The public must be educated about the board's need for fiscal responsibility

⁹⁸ Rosemary O'Leary, "Five Trends in Government Liability under Environmental Laws: Implications for Public Administration," Public Administration Review 53, no. 6 (Nov-Dec 1993), 548.

in addressing the issues of aging infrastructure in need of repairs and the high costs of those repairs.

In the end, the lawyers and the citizens must recognize the fact that these huge settlement fees and/or the settling -to-save litigations cost taxpayers millions of dollars; and, these dollars could be better spent providing public services and maintaining and improving the antiquated infrastructure. The Sewerage and Water Board in this case study has spent a small fortune to litigate this case, refusing to settle to save, but the consequences are dear. This litigation has yet to go to court, more and more defendants have been added over the years, and the plaintiff lawyers have continued to win other huge settlements over the years, allowing them to continue with this litigation, almost indefinitely, even though all of these plaintiffs have been displaced since Hurricane Katrina.

Clearly, government liability will significantly affect the budgets and administration of government entities for years to come. As Lauren Villa suggests, "when the cost of exposure to unlimited liability outweighs the benefits of accountability, the government's ability to continue public services is placed in jeopardy."⁹⁹ Sovereign immunity helps to protect the public by ensuring that essential public services continue without interruption. The rationale for sovereign immunity is to protect government resources from depletion to satisfy judgments and defend against lawsuits.

There are other policy justifications for sovereign immunity, most specifically, the justification to protect the orderly provision of government services from the distractions of lawsuits and exorbitant claims by limiting the government's exposure to liability. According to Villa, excessive litigation can interfere with effective delivery of services; immunity would

⁹⁹ Lauren Villa, "Public Service, Private Entity: Should the Nature of the Service or Entity Be Controlling on Issues of Sovereign Immunity?" St. John's Law Review 78 (June 2005) 1257.

provide a sense of security, eliminating the high costs of litigation entirely and translating into a better quality of service to the public.¹⁰⁰

It is not enough for defendant public service agencies to be exonerated of wrongdoing in a court of law. They must also be exonerated from the high costs of legal defense especially when lawsuits fail to establish wrongdoing on the part of the public entity. If legislation is not enacted granting sovereign immunity to public service providers barring any willful or fraudulent misconduct, then perhaps, limits of government liability need to be established. In the end, it is not just the public purse that suffers or the public agency; every private citizen bears the burden and the costs of long, protracted litigation.

King Louis XII of France said it best, "Lawyers use the law as shoemakers use leather; rubbing it, pressing it, and stretching it with their teeth, all to the end of making it fit their purposes."¹⁰¹ As long as the legal system rewards success with exorbitant fees and plaintiff awards, private law firms will continue to focus on selecting and pursuing cases that have a high potential for financial reward, further enhancing their risk-taking abilities and the public sector will be at their mercy. Only new public policy initiatives and legislative action can protect our public entities from the greed and hysteria of our litigious society.

¹⁰⁰ Villa, 1277.

¹⁰¹ King Louis XII of France, cited in Tuli Kupferberg, "An Insulting Look at Lawyers Through the Ages," Juris Doctor, (Oct-Nov 1978) 62.

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Appendix 1

34TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. BERNARD

NO. 63-145 STATE OF LOUISIANA DIVISION "D"

JEANETTE PALMER, ET AL.

VERSUS

BROWNING FERRIS, INC., ET AL.

NO. 65-773 - CONSOLIDATED WITH - DIVISION "C"
JACKLYN B. AGUILAR, ET AL.

VERSUS

BROWNING FERRIS, INC., ET AL.

FILED _____ DEPUTY CLERK _____

* * * * *

**SUPPLEMENTAL MEMORANDUM IN SUPPORT
OF MOTION TO COMPEL DISCOVERY AND
ADEQUATE RESPONSES TO CLAIM
FORMS/INTERROGATORIES/REQUEST
FOR PRODUCTION AND SANCTIONS**

MAY IT PLEASE THE COURT:

BFI Waste Systems of North America, Inc. (BFI) has previously filed a Motion to Compel pursuant to Article 1469 of the Louisiana Code of Civil Procedure, seeking an Order forcing plaintiffs to provide adequate responses to the claims forms (which are indeed interrogatories and requests for production). That motion was filed on March 27, 1998, and a hearing was set for March 31, 1998, but it does not appear that a judgment was ever rendered on said motion.

In the prior motion and memorandum, BFI gave the Court examples of problems and inadequacies in the claim forms filed by or on behalf of Plaintiffs # 49, # 93, # 92, and Plaintiff # 451

By way of supplementation of that motion, and to further illustrate the fact that plaintiffs have still not provided adequate and complete claims forms, BFI now refers the Court to three additional plaintiffs' claims forms, chosen at random merely for illustrative purposes. In filing

ENV39745.1

answers to questions concerning the alleged devaluation of their home, the nature of the toxic and hazardous substances to which they have been exposed and the support for such claims, and the claimed loss of use of their home, by stating variously that this information is "not yet proven", "subject to expert testimony" or "I don't know". They have ignored questions concerning the addresses of their children.

Their answers to questions on the claims form are virtually identical to those of other plaintiffs insofar as appraisals, emissions, loss of use, and contracting diseases are concerned.

PLAINTIFFS # 33 AND # ??

Mr. and Mrs. 33/?? have provided a claims form that is as defective as the others referred to hereinabove. While it was indeed signed and notarized on the same date October 7, 1997, it is by no means otherwise adequately or accurately answered.

As did the other plaintiffs, these plaintiffs have made complaints of illnesses and allegations that they have been exposed to hazardous and toxic substances, emissions, particulates, and the like. They allege loss of use of their property, alleging essentially that they are unable to use the property at all because of the odors and other problems outside. They have avoided, however, providing any specifics whatsoever stating that questions concerning toxic and hazardous substances and the nature thereof and loss of use are "not yet proven" and "subject to expert testimony". Their answers in this regard, and in regard to the contracting of diseases, appraisal, and the nature of the emissions, are virtually identical to those of all other plaintiffs whose forms have been reviewed. They have specifically not answered questions concerning a law suit filed by # 33 referred to on page 7 of the claims form.

All three of these groups of plaintiffs have provided only one set of answers to questions concerning when odors and emissions were first encountered, the effects of such odors and emissions on their style of living, and other questions clearly addressed to each plaintiff, rather than each set of plaintiffs.

BFI is prepared, should the Court be interested, to provide literally hundreds of examples of inadequacies of claims forms, as it would be a relatively simple (but truly tiresome) matter to go one-by-one through all of the claims forms received and to point out the inadequacies in

this supplemental memorandum, BFI does not wish to suggest that these are the only three claims forms that are inadequate. The truth is far from that - the truth is that none of the claims forms filed by plaintiffs comply with this Court's Order or with the letter or spirit of the claims forms. These three are merely examples of the inadequacies, evasive answers, and non-answers, to say nothing of the procedural improprieties, found in all the claims forms received so far.

PLAINTIFFS # 158 AND # 313

The family claims form makes it clear that Mr. and Mrs 158/313 along with their family, claim that their home has been devalued, but no appraisal information has been provided. It is clear that an appraisal has been made, however, by a company called "Capital" in August 1997, but the appraisal is not attached.

Information is provided in the claims form for persons named

Persons # 1, Person # 2, Person # 3, and # 4 when none of these people are plaintiffs.

When asked to provide information concerning the devaluation of their property, the nature and extent of toxic and hazardous substances to which they were exposed, evidence concerning loss of use of the property, and a variety of other topics, plaintiffs have essentially declined to answer, stating that this information is variously "not yet proven", "subject to expert testimony", or "I don't know". Plaintiffs' answers are similar in virtually all respects to those of other plaintiffs insofar as appraisals, the nature and extent of omissions, and contracting diseases are concerned.

PLAINTIFFS # 248 AND # 461

The claims form/answers of Mr. and Mrs 248/461 are dated February 25, 1998, but for some reason, were not notarized until May 7, 1998, raising the presumption, BFI suggests, that the answers were not in fact given under oath by these plaintiffs, but rather merely a notarization was performed long after the fact. It is suggested that plaintiffs are required to demonstrate by appropriate affidavit or otherwise that the answers are indeed those of Mr. and Mrs. 248/461 and are procedurally proper and appropriately notarized.

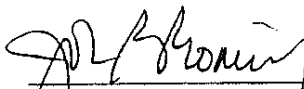
Plaintiffs disclosed that their home was appraised in 1994 but state that the appraisal company is "unknown" and no appraisal documentation is provided. Plaintiffs have evaded

each. BFI offers, however, the foregoing, along with those referred to in the prior memorandum, as randomly-drawn examples which demonstrate that plaintiffs' counsel (or perhaps plaintiffs, themselves) have simply not been open and forthcoming, and have not done a proper job of responding to the claims forms, making it virtually impossible for BFI to defend these damage claims. More than eight years after the filing of the first suit, and just a few months prior to what the Court has set as a trial date, BFI still does not have legitimate answers to just what it is plaintiffs claim is in the air, just what it is they smelled and when, how they have been injured, how their property has been devalued, and how they intend to prove all of the above.

Incredibly, though, plaintiffs' counsel continued to claim that they have been forthcoming, that they have done the best that they could, that they have engaged in a massive effort, that there is no need as a result for BFI to depose anyone further.

The Court should order that all plaintiffs (not just one member of each plaintiff group) respond immediately, fully, openly, and honestly (and this time under oath properly given), to the questions posed in the claims forms. Each plaintiff should be ordered to answer each question posed to him or her, and an order should be entered making it clear that "I don't know", "subject to expert testimony", "not yet proven" and similar "non-answer answers" shall be treated by this court as meaning that plaintiffs giving such answers have no information on point and will be precluded from introducing any at trial.

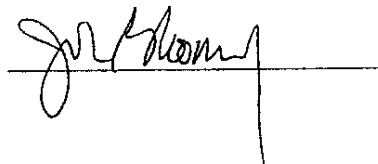
Respectfully submitted,



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Attorneys for Defendant, BFI Waste Systems
of North America, Inc.

CERTIFICATE

I hereby certify that a copy of the above and foregoing has been forwarded to all counsel,
of record ☐ by fax, ☐ by hand, ☒ by placing a copy of same in the U.S. Mail, first class postage
prepaid, this 18th day of August, 1998.

A handwritten signature in cursive script, appearing to read "J. L. Henry", is written over a horizontal line.

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
1	Late 70s	UNSURE	Yes	NO WAY TO KNOW	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2		1970	Yes	UNSURE	DON'T KNOW	<input type="checkbox"/>	<input type="checkbox"/>
3	late 1980s	1980s	Yes	SOOT, FILM	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	childhood	1985	Yes	SOOT, FILM	DON'T KNOW	<input type="checkbox"/>	<input type="checkbox"/>
5	1970s	1970s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6		LATE 70s-1993	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7	mid 1980s	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	1980	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
9	1985	1984	Yes	Yes (rats??)	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	1988	DON'T KNOW	Yes	BLACK FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	1990	1988	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12	mid 1980s	1986	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	1969	1980	Yes	DARK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
14	Don't know	DON'T KNOW	Yes	SAW ASHES	STET	<input type="checkbox"/>	<input type="checkbox"/>
15	1980s	1980	No	SOOT/ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	mid 1980s	1980s	Yes	FILM,ASH,DUST	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	1982	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
18	mid 1980s	1980s	Yes	SOOT/ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19	1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
20	1980/1990	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
21	1979/Hattie St	late 1970s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	late 1980s	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
23	late 1970s	late 1970s/1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24	1967	1980S	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
25	1980s	DON'T KNOW	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26	1983	1994	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
27	1985	1980s-1993	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
28	NONE	1980	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
29	1990	NO ANSWER	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
30	1985	1985	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
31	N/A SWB	NO ANSWER	No	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
32	mid 1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
33	mid 1980s	DON'T KNOW	No	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
34	NONE	NO ANSWER	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
35	NONE	NO ANSWER	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>

Source: Author

Appendix 2.
Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
36		1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
37	NONE	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
38	late 1970s	1966	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
39	1992	1988	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
40	1980	1980	Yes	ASH/OILY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
41		1970s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
42	1975	1975	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
43	1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
44	early 1970s	1970s/1980s	Yes	OILY BLACK SUBSTANCE	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
45	late 1980s	1981	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
46	1991	NO ANSWER	Yes	NO	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
48	1987	1970s	Yes	FILM	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
49	1979	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
50	?????	late 1979	Yes	YES	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
51	1979	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
52	1987	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
53	NONE	1980s/O-1973/E	Yes	BLACK FILM/MILDEW	STET	<input type="checkbox"/>	<input type="checkbox"/>
54	1984	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
55	1980s	1980	???	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
56	1989	NO ANSWER	No	NO	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
57		1980s	Yes	LIGHT FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
58	1973	late 1970s/early 1980s	??	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	early 1990s	1980s/O-1970s/E	Yes	FILM on cars	STET	<input type="checkbox"/>	<input type="checkbox"/>
60	late 1970s	1970s	Yes	1970s/spots on car 3x	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
61	late 1970s	late 1960s	Yes	BLACK STUFF	STET	<input type="checkbox"/>	<input type="checkbox"/>
62	1970s	late 1970s/early 1980s	Yes	SOOTY/OILY STUFF	STET	<input type="checkbox"/>	<input type="checkbox"/>
63	1980	1970s/O-1980s/E	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
64	1980s	1987	Yes	FILM, FLIES	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	1977	1980s	Yes	YELLOW POWDER	STET	<input type="checkbox"/>	<input type="checkbox"/>
66	late 1970s/early 1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
67	1980s	1980s	Yes	YES	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	early 1980s	NO ANSWER	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
69	1980	late 1970s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
70	early 1980s	NO ANSWER	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
71	early 1970s	NO ANSWER	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
72	1987	1993	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
73	1980s	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
74		late 1970s	Yes	DUST, SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
75	1980s	1980s	Yes	SOOT, OILY FILM	NONE AWARE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
76	?????	UNSURE	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
77	1980s	1980s	Yes	FILM, BLACK SPOTS	STET	<input type="checkbox"/>	<input type="checkbox"/>
78	1970s	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
79	1960s	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
80	1987	1970s/O-??/E	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
81	1974	1980s	Yes	DON'T KNOW	STET	<input type="checkbox"/>	<input type="checkbox"/>
82	1982	late 1970s/1980s	Yes	SOOTY ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
83	1990	1980s	Yes	SOOT, ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
84	1980	1980s	Yes	SOOT, ASH	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
85		NO ANSWER	Yes	SOOT, MILDEW	STET	<input type="checkbox"/>	<input type="checkbox"/>
86	1989	1989	Yes	FILM, SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
87	1980s	1984	Yes	FINE DUST	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
88	1985	1985	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
89	NO SWB	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
90	1987	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
91	????	late 1970s/1980s-O/1980s-E	Yes	BLACK FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
92	DON'T KNOW	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
93	1980s	1980s	Yes	BLACK, OILY SPOTS	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
94	1980s	1980s	Yes	BLACK SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
95	late 1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
96	late 1970s	1980s	Yes	FINE DUST	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
97	1983	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
98	late 1970s	1980s	Yes	SOOTY ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
99	1980s	1980s	Yes	FINE DUST	STET	<input type="checkbox"/>	<input type="checkbox"/>
100	1981	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
101	1970s	late 1970s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
102	late 1970s	1980s	Yes	CAN'T REMEMBER	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
103	1980s	late 1970s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
104	1980s	1980s	Yes	FINE DUST	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
105	1986	1980s	No	SOOT, BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
106		1980s	Yes	WHITE, POWDERY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Appendix 2.
Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
107	1985	1980s	Yes	YES	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
108	1979	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
109	1989	1980s	Yes	YES	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
110	early 1980s	1980s	Yes	ASH, SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
111	1980s	late 1970s/early 1980s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
112	1980s	1980s	Yes	BLACK FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
113	None	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
114	late 1970s	late 1970s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
115	early 1980s	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
116	late 1970s	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
117	1987	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118	NO INFO	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
119	???	1980s	Yes	BLACKISH SUBSTANCE	STET	<input type="checkbox"/>	<input type="checkbox"/>
120	1980s	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
121	No Answer	late 1970s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
122	1990	1980s	Yes	BLACK HAZE	STET	<input type="checkbox"/>	<input type="checkbox"/>
123	1989	1980	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
124	CHILDHOOD	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
125	mid 1980s	1980s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
126	CHILD/1980s	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
127	NO INFO	1980s	Yes	SOOT, ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
128	mid 1980s	mid 1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
129	1988	1988	Yes	BLACK FILM, SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
130	late 1970s	late 1970s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
131	mid 1980s	mid 1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
132	1980	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
133	mid 1980s	1980s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
134	1970s	1970s	Yes	SOOT, POWDER, ASHES	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
135	early 1980s	early 1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
136	?????	1980s	Yes	YES	STET	<input type="checkbox"/>	<input type="checkbox"/>
137	1985	1973	Yes	YES	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
138	NONE	1970/early 1980s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
139	1989	Don't know	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
140	1980s	mid 1980s	Yes	SOOT, ASH	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
141	NONE	Don't know	Yes	BLACK FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Appendix 2.
Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
142	early 1980s	late 1970s/1980s	Yes	SOOTY ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
143	1987	late 1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
144	1980s	1970s; Worse 1980s	Yes	YELLOW POWDER	STET	<input type="checkbox"/>	<input type="checkbox"/>
145	1980s	1980	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
146		1970s	Yes	FINE DUST, FILM	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
147	1980s	mid 1980s	Yes	FINE DUST	STET	<input type="checkbox"/>	<input type="checkbox"/>
148	1987	late 1970s/1980s	Yes	ASHY, DUSTY FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
149	1988	late 1980s	Yes	SOOT, BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
150	1980s	late 1970s/1980s	Yes	ASHY SUBSTANCE, DEBRIS	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
151	late 1970s	1980s	Yes	SOOT, MILDEW	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
152	early 1980s	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
153	late 1970s	late 1970s/1980s	Yes	ASHY FILM, MISTY CLOUD	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
154	late 1970s	late 1970s	Yes	BLACK RESIDUE	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
155	1970s	late 1970s/1980s	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
157	1989	1987	Yes	SOOT, FILM	YES	<input type="checkbox"/>	<input type="checkbox"/>
158	early 1980s	1980	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
159	1981	late 1970s	Yes	SOOTY, ASHY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
160	late 1970s	late 1980s	Yes	DON'T KNOW	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
161	1985	late 1970s/1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
162	1980s	late 1970s	Yes	SMOKE, ASHES, OILY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
163	1970s	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
164	1978	1978-1980S	Yes	ASHY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
165	1989	1980s	Yes	OILY, SOOTY SUBSTANCE	STET	<input type="checkbox"/>	<input type="checkbox"/>
166	1989	1980s	Yes	BLACK SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
167	late 1970s	1980s	Yes	BLACK SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
168	1982	early 1990s	Yes	FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
169	late 1980s	late 1970s	Yes	SOOTY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
170	late 1980s	1985	Yes	BLACK DUST	STET	<input type="checkbox"/>	<input type="checkbox"/>
171	1964	1970	Yes	DON'T KNOW	DON'T KNOW	<input checked="" type="checkbox"/>	<input type="checkbox"/>
172	1989	1989	Yes	SOOT, BLACK OILY SUBSTANCE	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
173	1980s	1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
174	1980s	mid 1970s/1980s	Yes	ASHY SUB, FINE DUST	STET	<input type="checkbox"/>	<input type="checkbox"/>
175	1990	1980s	Yes	SOOTY FILM, MILDEW	STET	<input type="checkbox"/>	<input type="checkbox"/>
176	1980s	1980s	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
177	NONE	late 1970s	Yes	No	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Appendix 2.
Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
178	1984	1970s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
179	mid 1980s	1980s	Yes	YELLOW SOOTY FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
180	1989	late 1970s	Yes	SOOT, ASHY FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
181	mid 1970s	mid 1970s	Yes	Air debris	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
182	mid 1980d	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
183	1980	late 1970s	Yes	Bird droppings	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
184	1980s	1980	No	Black Mold	STET	<input type="checkbox"/>	<input type="checkbox"/>
185	1985	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
186	late 1970s	LATE 1970s	Yes	BLACK FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
187	late 1970s	mid 1970s	Yes	SOOTY ASH	STET	<input type="checkbox"/>	<input type="checkbox"/>
188	mid 1980s	late 1980s	Yes	ASH	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
189	1980s	1980S	Yes	ASHY FILM, SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
190	mid 1980s	mid 1980s	Yes	GRAY SOOT, ASH	STET	<input type="checkbox"/>	<input type="checkbox"/>
191	1980s	1980S	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
192	1980s	1980S	Yes	RED DUST, SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
193	no info	NO INFORMATION	No	NO	NO	<input checked="" type="checkbox"/>	<input type="checkbox"/>
194	early 1980s	1980S	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
195	1980s	1984	Yes	NO	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
196	1980s	1980s	Yes	Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
197	1969	mid 1970s	Yes	Sticky Substance	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
198	1988	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
199	1978	mid 1980s	Yes	YES	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
200	NONE	1980	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
201	don't know	1980S	Yes	ASHY SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
202	NO INFO	LATE 1970S	Yes	SOOT, ASH	STET	<input type="checkbox"/>	<input type="checkbox"/>
203	1980s	1980S	Yes	SOOT, FILM	STET	<input type="checkbox"/>	<input type="checkbox"/>
204	1980s	1980S	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
205	1980s	1980S	Yes	STICKY SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
206	NONE	1980S	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
207	mid 1970s	mid 1970s	Yes	ASHY FILM	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
208	late 1970s	late 1980s	Yes	Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
209	early 1980s	1980s	Yes	Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
210	late 1970s		Yes	Soot	STET	<input type="checkbox"/>	<input type="checkbox"/>
211	1987	1980s	Yes	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
212	childhood	???? (Can't recall odors)	No	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
213	mid 1980s	1986	Yes	Sticky Substance	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
214	1979	1970s	Yes	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
215	1980s	1980s	Yes	Blackish, grayish film	STET	<input type="checkbox"/>	<input type="checkbox"/>
216	1970s	1980s	Yes	White Film	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
217	1980s	1980s	Yes	No	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
218	NO INFO	early 1980s	Yes	SOOT	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
219		1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
220	1978	1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
221	1990	MID 1980s	Yes	SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
222	1984/1993	MID 1980s	Yes	Soot, Film	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
223	NO INFO	LATE 1970S/1980s	Yes	Ashes, Film	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
224	late 1970s	MID 1970s/1980s	Yes	Yes	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
225	1969	late 1970s/early 1980s	Yes	Soot	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
226	NONE	1980s	Yes	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
227	1980	1980s	Yes	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
228	1985	mid 1980s	Yes	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
229	late 1980s	late 1980s	Yes	Soot, Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
230	1987	1987	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
231	1987	1987	Yes	Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
232		1980s	Yes	Black Film	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
233	late 1980s	1989	Yes	Dusty Film	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
234	late 1970s	MID 1980s	Yes	Fine Dust	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
235	1980s	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
236	NONE	1980s	Yes	Sooty, Oily Substance	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
237	1978	1980s	Yes	Soot	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
238	late 1980s	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
239	NO INFO	late 1970s	Yes	Black, Gray Film	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
240	1991	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
241	1987	early 1980s	Yes	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
242	late 1970s	1980	Yes	Yes	STET	<input type="checkbox"/>	<input type="checkbox"/>
243	NONE	1981	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
245	1980s	early 1970s	Yes	Black Soot, Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
246	NO INFO	1980s	Yes	Don't Know STET	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
247	NO INFO	1980s	Yes	No	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
248	late 1960s	1980	Yes	Sooty Ashy Film	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
249	mid 1980s	1980s	Yes	Soot	STET	<input type="checkbox"/>	<input type="checkbox"/>
250	1981	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
251	mid 1980s	early 1980s	Yes	Soot	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
252	mid 1980s	mid 1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
253	1980s	mid 1980s	Yes	Fine Dust	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
254	Late 1970s		No			<input type="checkbox"/>	<input type="checkbox"/>
255	NO INFO		No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
256	mid 1980s	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
257	NONE		No			<input type="checkbox"/>	<input type="checkbox"/>
258	1980s	mid 1980s	Yes	Fine Dust	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
259	1980	mid 1980s	Yes	Fine Dust	STET	<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	1980s	late 1980s	Yes	Soot, Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
261	NO INFO		No			<input type="checkbox"/>	<input type="checkbox"/>
262	late 1960s	late 1970s/early 1980s	Yes	Black Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
263	NONE	NO INFO	???	NO	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
264	NONE	NO INFO	???	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
265	NONE	NO INFO	???	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
266	NONE	NO INFO	???	NO	STET	<input type="checkbox"/>	<input type="checkbox"/>
267	1984	Late 1970s-1980s	Yes	Ashy substance, debris, soot	STET	<input type="checkbox"/>	<input type="checkbox"/>
268	mid 1980s	1984	Yes	No	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
269	1984	1984	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
270	NO INFO					<input checked="" type="checkbox"/>	<input type="checkbox"/>
271	1973					<input type="checkbox"/>	<input type="checkbox"/>
272	1983					<input type="checkbox"/>	<input type="checkbox"/>
273	1985					<input type="checkbox"/>	<input type="checkbox"/>
274	mid 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
275	early 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
276	don't know					<input type="checkbox"/>	<input type="checkbox"/>
277	1980					<input type="checkbox"/>	<input type="checkbox"/>
278	1988					<input type="checkbox"/>	<input type="checkbox"/>
279	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
280	NO ANSWER	1980s	Yes	Whitish/gray particles	EXPERT	<input checked="" type="checkbox"/>	<input type="checkbox"/>
281	No Answer	1980s	Yes	Yes	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
282	1970S					<input type="checkbox"/>	<input type="checkbox"/>
283	1970s					<input type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
284	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
285	NONE					<input checked="" type="checkbox"/>	<input type="checkbox"/>
286	1989					<input checked="" type="checkbox"/>	<input type="checkbox"/>
287	1980					<input checked="" type="checkbox"/>	<input type="checkbox"/>
288	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
289	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
290	1989					<input type="checkbox"/>	<input type="checkbox"/>
291	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
292	1987					<input type="checkbox"/>	<input type="checkbox"/>
293	NO SWB					<input type="checkbox"/>	<input type="checkbox"/>
294	1980s					<input type="checkbox"/>	<input type="checkbox"/>
295	NONE	1982	Yes	ASH, SOOT	STET	<input type="checkbox"/>	<input type="checkbox"/>
296	mid 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
297	1986					<input checked="" type="checkbox"/>	<input type="checkbox"/>
298	1986					<input type="checkbox"/>	<input type="checkbox"/>
299	1986					<input type="checkbox"/>	<input type="checkbox"/>
300	1987					<input type="checkbox"/>	<input type="checkbox"/>
301	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
302	N/A					<input type="checkbox"/>	<input type="checkbox"/>
304	1988					<input type="checkbox"/>	<input type="checkbox"/>
305	1984					<input type="checkbox"/>	<input type="checkbox"/>
306	1991					<input type="checkbox"/>	<input type="checkbox"/>
307	1985					<input type="checkbox"/>	<input type="checkbox"/>
308	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
309	1980s					<input type="checkbox"/>	<input type="checkbox"/>
310	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
311	1980s					<input type="checkbox"/>	<input type="checkbox"/>
312	1987					<input type="checkbox"/>	<input type="checkbox"/>
313	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
314	childhood					<input type="checkbox"/>	<input type="checkbox"/>
315	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
316	1980	1980s	Yes	Soot, Film	STET	<input type="checkbox"/>	<input type="checkbox"/>
317	childhood					<input type="checkbox"/>	<input type="checkbox"/>
318	1985					<input type="checkbox"/>	<input type="checkbox"/>
319	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
320	1982					<input type="checkbox"/>	<input type="checkbox"/>
321	1986					<input checked="" type="checkbox"/>	<input type="checkbox"/>
322	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
323	1983					<input checked="" type="checkbox"/>	<input type="checkbox"/>
324	NONE					<input type="checkbox"/>	<input checked="" type="checkbox"/>
325	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
326	1985					<input type="checkbox"/>	<input type="checkbox"/>
327	None					<input type="checkbox"/>	<input type="checkbox"/>
328	????					<input checked="" type="checkbox"/>	<input type="checkbox"/>
329	1982					<input type="checkbox"/>	<input type="checkbox"/>
330	????					<input type="checkbox"/>	<input type="checkbox"/>
331	mid 1980s	1980s	Yes	Yes	STET	<input type="checkbox"/>	<input type="checkbox"/>
332	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
333	1987					<input type="checkbox"/>	<input type="checkbox"/>
334	1987					<input checked="" type="checkbox"/>	<input type="checkbox"/>
335	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
336	1987					<input type="checkbox"/>	<input type="checkbox"/>
337	1984	mid 1980s	Yes	Black Firm	STET	<input type="checkbox"/>	<input type="checkbox"/>
338	1984					<input checked="" type="checkbox"/>	<input type="checkbox"/>
339	1989					<input type="checkbox"/>	<input type="checkbox"/>
340	1989					<input checked="" type="checkbox"/>	<input type="checkbox"/>
341	1989					<input type="checkbox"/>	<input type="checkbox"/>
342	1989					<input type="checkbox"/>	<input type="checkbox"/>
343	late 1980s	NO INFO	NO INF	NO INFO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
344	1978					<input type="checkbox"/>	<input type="checkbox"/>
345	1978					<input checked="" type="checkbox"/>	<input type="checkbox"/>
346	1982/BIRTH					<input type="checkbox"/>	<input type="checkbox"/>
347	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
348	1989					<input type="checkbox"/>	<input type="checkbox"/>
349	mid 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
350	1976					<input checked="" type="checkbox"/>	<input type="checkbox"/>
351	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
352	1985					<input checked="" type="checkbox"/>	<input type="checkbox"/>
353	1985					<input type="checkbox"/>	<input type="checkbox"/>
354	1989/birth					<input type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
355	1980s					<input type="checkbox"/>	<input type="checkbox"/>
356	1985					<input type="checkbox"/>	<input type="checkbox"/>
357	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
358						<input checked="" type="checkbox"/>	<input type="checkbox"/>
359	1984					<input type="checkbox"/>	<input type="checkbox"/>
360	NO INFO					<input type="checkbox"/>	<input checked="" type="checkbox"/>
361	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
362	1980s					<input type="checkbox"/>	<input type="checkbox"/>
363	1980s					<input type="checkbox"/>	<input type="checkbox"/>
364	1987					<input type="checkbox"/>	<input type="checkbox"/>
365	????					<input checked="" type="checkbox"/>	<input type="checkbox"/>
366	mid 1980s					<input type="checkbox"/>	<input type="checkbox"/>
367	1988					<input type="checkbox"/>	<input type="checkbox"/>
368	mid 1980s					<input type="checkbox"/>	<input type="checkbox"/>
369	1988					<input type="checkbox"/>	<input type="checkbox"/>
370	mid 1980s					<input type="checkbox"/>	<input type="checkbox"/>
371	1987					<input checked="" type="checkbox"/>	<input type="checkbox"/>
372	1980					<input checked="" type="checkbox"/>	<input type="checkbox"/>
373	1980					<input checked="" type="checkbox"/>	<input type="checkbox"/>
374	BIRTH					<input checked="" type="checkbox"/>	<input type="checkbox"/>
375	1980					<input type="checkbox"/>	<input type="checkbox"/>
376	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
377	1981					<input type="checkbox"/>	<input type="checkbox"/>
378	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
379	late 1980s					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
380	NONE					<input type="checkbox"/>	<input type="checkbox"/>
381	???					<input checked="" type="checkbox"/>	<input type="checkbox"/>
382	1980s					<input type="checkbox"/>	<input type="checkbox"/>
383	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
384	1987					<input checked="" type="checkbox"/>	<input type="checkbox"/>
385	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
386	1980s					<input type="checkbox"/>	<input type="checkbox"/>
387	NONE					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
388	1968/1987					<input checked="" type="checkbox"/>	<input type="checkbox"/>
389	1987					<input type="checkbox"/>	<input type="checkbox"/>

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Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
390	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
391	mid 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
392	mid 1980s					<input type="checkbox"/>	<input type="checkbox"/>
393	1988					<input type="checkbox"/>	<input type="checkbox"/>
394	1980					<input type="checkbox"/>	<input type="checkbox"/>
395	NONE					<input checked="" type="checkbox"/>	<input type="checkbox"/>
396	mid 1980s					<input type="checkbox"/>	<input type="checkbox"/>
397	NONE					<input type="checkbox"/>	<input type="checkbox"/>
398	1984					<input type="checkbox"/>	<input type="checkbox"/>
399	DON'T KNOW					<input type="checkbox"/>	<input type="checkbox"/>
400	1984					<input type="checkbox"/>	<input type="checkbox"/>
401	1989					<input type="checkbox"/>	<input type="checkbox"/>
402	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
403	1970s					<input type="checkbox"/>	<input type="checkbox"/>
404	1988	late 1970s/mid 1980s	Yes	FILM/SOOT	STET	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
405	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
406	1978					<input checked="" type="checkbox"/>	<input type="checkbox"/>
407	1974					<input type="checkbox"/>	<input type="checkbox"/>
408	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
409	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
410	1990					<input type="checkbox"/>	<input type="checkbox"/>
411	1991					<input type="checkbox"/>	<input type="checkbox"/>
412	NO SWB					<input type="checkbox"/>	<input type="checkbox"/>
413	1980					<input type="checkbox"/>	<input type="checkbox"/>
414	1980s					<input type="checkbox"/>	<input type="checkbox"/>
415	1985					<input checked="" type="checkbox"/>	<input type="checkbox"/>
416	1985					<input type="checkbox"/>	<input type="checkbox"/>
417	DON'T KNOW					<input checked="" type="checkbox"/>	<input type="checkbox"/>
418	NONE					<input type="checkbox"/>	<input type="checkbox"/>
419	1990					<input type="checkbox"/>	<input type="checkbox"/>
420	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
421	1984					<input type="checkbox"/>	<input type="checkbox"/>
422	1981					<input type="checkbox"/>	<input type="checkbox"/>
423	1983					<input type="checkbox"/>	<input type="checkbox"/>
424	1980s					<input type="checkbox"/>	<input type="checkbox"/>

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
425	1980s					<input type="checkbox"/>	<input type="checkbox"/>
426	1988	August 1988	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
427	NONE					<input type="checkbox"/>	<input type="checkbox"/>
428	NONE					<input type="checkbox"/>	<input type="checkbox"/>
429	1982					<input type="checkbox"/>	<input type="checkbox"/>
430	1981					<input checked="" type="checkbox"/>	<input type="checkbox"/>
431	1981					<input checked="" type="checkbox"/>	<input type="checkbox"/>
432	BIRTH/1982					<input type="checkbox"/>	<input type="checkbox"/>
433	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
434	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
435	1980s					<input type="checkbox"/>	<input type="checkbox"/>
436	1980s					<input type="checkbox"/>	<input type="checkbox"/>
437	1988					<input type="checkbox"/>	<input type="checkbox"/>
438	1980s					<input type="checkbox"/>	<input type="checkbox"/>
439	mid 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
440	1988					<input type="checkbox"/>	<input type="checkbox"/>
441	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
442	early 1990s					<input type="checkbox"/>	<input type="checkbox"/>
443	1989					<input type="checkbox"/>	<input type="checkbox"/>
444	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
445	1980s	1980s	Yes	BLACK FILM	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
446	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
447	1984					<input type="checkbox"/>	<input type="checkbox"/>
448	NONE	1980s	Yes	No	STET	<input type="checkbox"/>	<input type="checkbox"/>
449	NONE					<input type="checkbox"/>	<input type="checkbox"/>
450	1988					<input type="checkbox"/>	<input type="checkbox"/>
451	late 1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
452	1989					<input type="checkbox"/>	<input type="checkbox"/>
453	1989					<input type="checkbox"/>	<input type="checkbox"/>
454	NONE					<input checked="" type="checkbox"/>	<input type="checkbox"/>
455	1980s					<input type="checkbox"/>	<input type="checkbox"/>
456	NONE					<input type="checkbox"/>	<input type="checkbox"/>
457	NONE					<input type="checkbox"/>	<input type="checkbox"/>
458	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
459	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
460	1984					<input type="checkbox"/>	<input type="checkbox"/>
461	late 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
462	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
463	1983					<input checked="" type="checkbox"/>	<input type="checkbox"/>
464	1988					<input type="checkbox"/>	<input type="checkbox"/>
465	????					<input type="checkbox"/>	<input type="checkbox"/>
466	late 1970s					<input type="checkbox"/>	<input type="checkbox"/>
467	NO INFO					<input checked="" type="checkbox"/>	<input type="checkbox"/>
468	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>
469	1980s					<input type="checkbox"/>	<input type="checkbox"/>
470	mid 1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
471	NO SWB INFO					<input type="checkbox"/>	<input type="checkbox"/>
472	1980s					<input type="checkbox"/>	<input type="checkbox"/>
473	1980s					<input type="checkbox"/>	<input type="checkbox"/>
474	1980s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
475	2 DATES					<input type="checkbox"/>	<input type="checkbox"/>
476	late 1980s					<input type="checkbox"/>	<input type="checkbox"/>
477	1980					<input checked="" type="checkbox"/>	<input type="checkbox"/>
478	1987					<input type="checkbox"/>	<input type="checkbox"/>
479	1980s					<input type="checkbox"/>	<input type="checkbox"/>
480	1985					<input checked="" type="checkbox"/>	<input type="checkbox"/>
481	1980s					<input type="checkbox"/>	<input type="checkbox"/>
482	1990					<input type="checkbox"/>	<input type="checkbox"/>
483	late 1980s					<input type="checkbox"/>	<input checked="" type="checkbox"/>
484	1985					<input type="checkbox"/>	<input type="checkbox"/>
485	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
486	No Answer					<input type="checkbox"/>	<input type="checkbox"/>
487	1981					<input type="checkbox"/>	<input type="checkbox"/>
488	1980s					<input type="checkbox"/>	<input type="checkbox"/>
489	1970s					<input checked="" type="checkbox"/>	<input type="checkbox"/>
490						<input type="checkbox"/>	<input type="checkbox"/>
491	1980s					<input type="checkbox"/>	<input type="checkbox"/>
492						<input type="checkbox"/>	<input type="checkbox"/>
493	mid 1970s	1975	Yes	Dust, Liquid, Whitish Gray in color	STET	<input checked="" type="checkbox"/>	<input type="checkbox"/>
494	NO INFO					<input type="checkbox"/>	<input type="checkbox"/>

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
495	1989					<input type="checkbox"/>	<input type="checkbox"/>
496	early 1980s	1983	Yes	Soot, Ash	STET	<input type="checkbox"/>	<input type="checkbox"/>
497	early 1980s					<input type="checkbox"/>	<input type="checkbox"/>
498						<input type="checkbox"/>	<input type="checkbox"/>
499						<input type="checkbox"/>	<input type="checkbox"/>
500						<input type="checkbox"/>	<input type="checkbox"/>
501						<input type="checkbox"/>	<input type="checkbox"/>
502						<input type="checkbox"/>	<input type="checkbox"/>
503						<input type="checkbox"/>	<input type="checkbox"/>
504						<input type="checkbox"/>	<input type="checkbox"/>
505						<input type="checkbox"/>	<input type="checkbox"/>
506						<input type="checkbox"/>	<input type="checkbox"/>
507						<input type="checkbox"/>	<input type="checkbox"/>
508						<input type="checkbox"/>	<input type="checkbox"/>
509						<input type="checkbox"/>	<input type="checkbox"/>
510						<input type="checkbox"/>	<input type="checkbox"/>
511						<input type="checkbox"/>	<input type="checkbox"/>
512						<input type="checkbox"/>	<input type="checkbox"/>
513						<input type="checkbox"/>	<input type="checkbox"/>
514						<input type="checkbox"/>	<input type="checkbox"/>
515						<input type="checkbox"/>	<input type="checkbox"/>
516						<input type="checkbox"/>	<input type="checkbox"/>
517						<input type="checkbox"/>	<input type="checkbox"/>
518						<input type="checkbox"/>	<input type="checkbox"/>
519						<input type="checkbox"/>	<input type="checkbox"/>
520						<input type="checkbox"/>	<input type="checkbox"/>
521						<input type="checkbox"/>	<input type="checkbox"/>
522						<input type="checkbox"/>	<input type="checkbox"/>
523						<input type="checkbox"/>	<input type="checkbox"/>
524						<input type="checkbox"/>	<input type="checkbox"/>
525						<input type="checkbox"/>	<input type="checkbox"/>
526						<input type="checkbox"/>	<input type="checkbox"/>
527						<input type="checkbox"/>	<input type="checkbox"/>
528						<input type="checkbox"/>	<input type="checkbox"/>
529						<input type="checkbox"/>	<input type="checkbox"/>

Appendix 2.

Table 9. SWB Impact Date, Symptom Date, Odors, Emissions & Toxic Substances

ID	SYMPTOMS	SWB IMPACT DATE	ODORS	EMISSIONS	TOXIC	SMOKING	CHEMICALS
530						<input type="checkbox"/>	<input type="checkbox"/>
531						<input type="checkbox"/>	<input type="checkbox"/>
532						<input type="checkbox"/>	<input type="checkbox"/>
533	NO SWB	NO SWB INFO	YES	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
534	NO SWB					<input checked="" type="checkbox"/>	<input type="checkbox"/>
535	NO SWB					<input checked="" type="checkbox"/>	<input type="checkbox"/>
536	NO SWB					<input type="checkbox"/>	<input type="checkbox"/>
537	NO SWB					<input type="checkbox"/>	<input type="checkbox"/>
538						<input type="checkbox"/>	<input type="checkbox"/>
539						<input type="checkbox"/>	<input type="checkbox"/>
540						<input type="checkbox"/>	<input type="checkbox"/>
541						<input type="checkbox"/>	<input type="checkbox"/>
542						<input type="checkbox"/>	<input type="checkbox"/>
543						<input type="checkbox"/>	<input type="checkbox"/>
544						<input type="checkbox"/>	<input type="checkbox"/>
545						<input type="checkbox"/>	<input type="checkbox"/>
546						<input type="checkbox"/>	<input type="checkbox"/>
547						<input type="checkbox"/>	<input type="checkbox"/>
548						<input type="checkbox"/>	<input type="checkbox"/>
549						<input type="checkbox"/>	<input type="checkbox"/>
550						<input type="checkbox"/>	<input type="checkbox"/>
551						<input type="checkbox"/>	<input type="checkbox"/>
552						<input type="checkbox"/>	<input type="checkbox"/>
553						<input type="checkbox"/>	<input type="checkbox"/>
554						<input type="checkbox"/>	<input type="checkbox"/>
555						<input type="checkbox"/>	<input type="checkbox"/>
556						<input type="checkbox"/>	<input type="checkbox"/>

Appendix 3.

Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
1	YES	YES	YES	YES	SKIN SPLOTCHES	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2						<input type="checkbox"/>	<input type="checkbox"/>
3	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
5	YES	YES	YES	YES	Shortness of breath	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6						<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7	YES	YES	YES	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	NO	YES	YES	NO	cancer	<input type="checkbox"/>	<input type="checkbox"/>
9	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	NO	YES	NO	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
12	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
14	YES	NO	NO	YES	Lupus	<input type="checkbox"/>	<input type="checkbox"/>
15	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	YES	YES	NO	YES	asthma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
18	YES	YES	YES	YES	shortness of breath	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19	NO	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
20	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
21	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
23	YES	NO	YES	YES	pulmonary fibrosis	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
25	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
26	YES	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
27	YES	YES	YES	YES	asthma	<input type="checkbox"/>	<input type="checkbox"/>
28	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
29	YES	YES	YES	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
30	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
31	N/A SWB	N/A SWB	N/A SWB	N/A SWB		<input type="checkbox"/>	<input type="checkbox"/>
32	YES	NO	NO	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
33	YES	YES	NO	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
34	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
35	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>

Source: Author

Appendix 3.
Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
36						<input type="checkbox"/>	<input type="checkbox"/>
37	NONE	NONE	NONE	NONE		<input checked="" type="checkbox"/>	<input type="checkbox"/>
38	NO	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
39	NO	YES	YES	YES	rash/nose/ears	<input checked="" type="checkbox"/>	<input type="checkbox"/>
40	YES	YES	NO	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
41						<input type="checkbox"/>	<input type="checkbox"/>
42	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
43	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
44	YES	YES	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
45	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
46	YES	YES	YES	YES	phlemgh/growth	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
48	YES	YES	NO	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
49	YES	YES	NO	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
50	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
51	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
52	NO	NO	NO	YES	Emphysema	<input type="checkbox"/>	<input type="checkbox"/>
53	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
54	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
55	NO	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
56	YES	NO	NO	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
57						<input type="checkbox"/>	<input type="checkbox"/>
58	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
60	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
61	YES	YES	NO	YES	breast cancer	<input type="checkbox"/>	<input type="checkbox"/>
62	YES	YES	YES	YES	kidney/legs amputated	<input type="checkbox"/>	<input type="checkbox"/>
63	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
64	YES	YES	YES	YES	Shortness of breath	<input checked="" type="checkbox"/>	<input type="checkbox"/>
65	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
66	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
67	YES	YES	NO	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
68	YES	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
69	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
70	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
71	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
72	NO	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
73	YES	NO	YES	YES	Emphysema, bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
74						<input type="checkbox"/>	<input type="checkbox"/>
75	NO	YES	NO	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
76	YES	YES	YES	YES	Bronchial problems	<input checked="" type="checkbox"/>	<input type="checkbox"/>
77	YES	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
78	YES	YES	YES	YES	Tuberculosis, Kron's	<input checked="" type="checkbox"/>	<input type="checkbox"/>
79	NO	YES	YES	YES	calciated lung	<input type="checkbox"/>	<input type="checkbox"/>
80	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
81	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
82	NO	NO	YES	YES	Lung Cancer, Emphysema	<input checked="" type="checkbox"/>	<input type="checkbox"/>
83	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
84	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
85						<input type="checkbox"/>	<input type="checkbox"/>
86	YES	YES	YES	YES	asthmas	<input checked="" type="checkbox"/>	<input type="checkbox"/>
87	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
88	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
89	NO SWB	NO SWB INFO	NO SWB INFO	NO SWB INFO		<input type="checkbox"/>	<input type="checkbox"/>
90	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
91	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
92	NO	NO	NO	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
93	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
94	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
95	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
96	YES	NO	NO	YES	Bronchitis	<input type="checkbox"/>	<input checked="" type="checkbox"/>
97	YES	YES	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
98	NO	NO	NO	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
99	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
100	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
101	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
102	YES	NO	NO	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
103	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
104	YES	YES	NO	NO	High blood pressure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
105	NO	NO	NO	NO	bladder/bone cancer	<input type="checkbox"/>	<input type="checkbox"/>
106						<input checked="" type="checkbox"/>	<input type="checkbox"/>

Appendix 3.
Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
107	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
108	NO	YES	YES	NO	inner ear	<input type="checkbox"/>	<input type="checkbox"/>
109	YES	YES	YES	YES	Shortness of breath	<input checked="" type="checkbox"/>	<input type="checkbox"/>
110	NO	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
111	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
112	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
113	NO	NO	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
114	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
115	YES	NO	NO	YES	lung cancer, emphysema	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
116	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
117	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
118	NO INFO	NO INFO	NO INFO	NO INFO	kidney cancer	<input type="checkbox"/>	<input type="checkbox"/>
119	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
120	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
121	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
122	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
123	YES	YES	YES	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
124	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
125	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
126	NO	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
127	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input checked="" type="checkbox"/>	<input type="checkbox"/>
128	YES	YES	YES	YES	emphysema	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
129	YES	YES	YES	NO	hives/skin cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
130	YES	YES	NO	NO	cancer/ovary	<input type="checkbox"/>	<input type="checkbox"/>
131	YES	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
132	NO	YES	NO	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
133	NO	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
134	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
135	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
136	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
137	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
138	NO	NO	NO	NO	Cancer	<input type="checkbox"/>	<input type="checkbox"/>
139	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
140	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
141	NONE	NONE	NONE	NONE		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
142	NO	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
143	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
144	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
145	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
146						<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
147	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
148	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
149	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
150	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
151	YES	NO	NO	NO	Throat Cancer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
152	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
153	YES	YES	YES	YES	Cancer, kidney/heart failure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
154	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input checked="" type="checkbox"/>
155	YES	YES	NO	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
157	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
158	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
159	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
160	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
161	YES	YES	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
162	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
163	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
164	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
165	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
166	YES	YES	YES	YES	Heart surgery	<input type="checkbox"/>	<input type="checkbox"/>
167	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
168	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
169	YES	YES	YES	YES	Bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
170	YES	YES	YES	YES	non Hodgkins lymphoma sinuses	<input type="checkbox"/>	<input type="checkbox"/>
171	YES	YES	YES	NO	colitis, skin cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
172	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
173	NO	YES	YES	YES	Heart problems	<input checked="" type="checkbox"/>	<input type="checkbox"/>
174	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
175	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
176	YES	YES	YES	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
177	NO	NO	NO	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
178	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
179	YES	YES	YES	YES	lung nodules	<input type="checkbox"/>	<input type="checkbox"/>
180	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
181	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
182	NO	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
183	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
184	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
185	NO	YES	YES	YES	Asthma, bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
186	YES	NO	NO	YES	Lung infections	<input type="checkbox"/>	<input type="checkbox"/>
187	YES	YES	YES	YES	lung fungus	<input type="checkbox"/>	<input type="checkbox"/>
188	YES	YES	NO	YES	Bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
189	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
190	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
191	YES	YES	YES	YES	Shortness of breath	<input type="checkbox"/>	<input type="checkbox"/>
192	YES	NO	YES	NO	Cancer	<input type="checkbox"/>	<input type="checkbox"/>
193						<input checked="" type="checkbox"/>	<input type="checkbox"/>
194	YES	YES	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
195	YES	YES	YES	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
196	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
197	NO	NO	YES	YES	Lupus	<input checked="" type="checkbox"/>	<input type="checkbox"/>
198	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
199	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
200	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
201	YES	NO	YES	YES	CardioPulmonary Obstructive Disease	<input checked="" type="checkbox"/>	<input type="checkbox"/>
202	NO INFO	NO INFO	NO INFO	NO INFO	Heart problems; sinus	<input type="checkbox"/>	<input type="checkbox"/>
203	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
204	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
205	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
206	NO	NO	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
207	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
208	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
209	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
210						<input type="checkbox"/>	<input type="checkbox"/>
211	YES	NO	NO	NO	NO	<input checked="" type="checkbox"/>	<input type="checkbox"/>
212	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
213	YES	YES	NO	YES	Legionnaire's disease	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
214	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
215	YES	NO	YES	NO	stomach ulcers/cataracts	<input type="checkbox"/>	<input type="checkbox"/>
216	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
217	YES	YES	NO INFO	NO INFO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
218	NO INFO	NO INFO	NO INFO	NO INFO	Alzheimer's	<input checked="" type="checkbox"/>	<input type="checkbox"/>
219						<input type="checkbox"/>	<input type="checkbox"/>
220	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
221	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
222	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
223	NO INFO	NO INFO	NO INFO	NO INFO	emphysema	<input checked="" type="checkbox"/>	<input type="checkbox"/>
224	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
225	YES	YES	YES	YES	asthma	<input type="checkbox"/>	<input checked="" type="checkbox"/>
226	NONE	NONE	NONE	NONE	NONE	<input type="checkbox"/>	<input type="checkbox"/>
227	YES	YES	YES	YES	asthma, bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
228	YES	YES	YES	NO	Skin rashes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
229	YES	YES	YES	YES	Bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
230	YES	YES	YES	YES	Asthma	<input type="checkbox"/>	<input type="checkbox"/>
231	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
232						<input checked="" type="checkbox"/>	<input type="checkbox"/>
233	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
234	NO	YES	YES	NO	SKIN SPLOTCHES	<input checked="" type="checkbox"/>	<input type="checkbox"/>
235	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
236	NO	NO	NO	NO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
237	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
238	YES	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
239	NO INFO	NO INFO	NO INFO	NO INFO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
240	YES	YES	YES	YES	cancer, diabetes, high blood pressure	<input type="checkbox"/>	<input type="checkbox"/>
241	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
242	YES	YES	YES	YES	Alzheimer's	<input type="checkbox"/>	<input type="checkbox"/>
243	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
245	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
246	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
247	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input checked="" type="checkbox"/>
248	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
249						<input type="checkbox"/>	<input type="checkbox"/>
250	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
251	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
252						<input type="checkbox"/>	<input type="checkbox"/>
253	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
254	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
255	NO INFO	NO INFO	NO INFO	NO INFO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
256	NO	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
257	NONE	NO	NO	NO	NONE	<input type="checkbox"/>	<input type="checkbox"/>
258	NO	YES	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
259	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
261	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>
262	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
263	NO	NO	NO	NO	Kidney Stones	<input checked="" type="checkbox"/>	<input type="checkbox"/>
264	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
265	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
266	NO	NO	NO	NO	ONE DIZZY SPELL	<input type="checkbox"/>	<input type="checkbox"/>
267	CAN'T BE SU	YES	YES	CAN'T B SURE	CANCER, EMPHYSEMA, LUNG DISEASE	<input type="checkbox"/>	<input type="checkbox"/>
268	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
269	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
270	NO INFO	NO INFO	NO INFO	NO INFO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
271	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
272	YES	YES	YES	YES	chronic tracheitis	<input type="checkbox"/>	<input type="checkbox"/>
273	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
274	NO	YES	YES	NO	Miscarriage	<input checked="" type="checkbox"/>	<input type="checkbox"/>
275	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
276	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
277	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
278	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
279	NO	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
280	NONE	NONE	NONE	NONE	NASAL/SINUS	<input checked="" type="checkbox"/>	<input type="checkbox"/>
281	YES	YES	YES	NO	liver cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
282	NO	YES	YES	YES	Bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
283	NO	NO	NO	NO	Headaches	<input type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
284	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
285	NONE	NONE	NONE	NONE	NONE	<input checked="" type="checkbox"/>	<input type="checkbox"/>
286	NO	NO	YES	NO	Breast cancer; kidney failure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
287	YES	YES	YES	YES	Lung,Heart, Kidney problems	<input checked="" type="checkbox"/>	<input type="checkbox"/>
288	YES	YES	YES	YES	Lung Disease	<input checked="" type="checkbox"/>	<input type="checkbox"/>
289	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
290	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
291	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
292	YES	YES	YES	YES	Asthma	<input type="checkbox"/>	<input type="checkbox"/>
293	NO SWB	NO SWB	NO SWB	NO SWB		<input type="checkbox"/>	<input type="checkbox"/>
294	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
295	NO	NO	NO	NO	NONE	<input type="checkbox"/>	<input type="checkbox"/>
296	YES	NO	YES	NO	Headaches	<input checked="" type="checkbox"/>	<input type="checkbox"/>
297	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
298	YES	YES	YES	YES	asthma	<input type="checkbox"/>	<input type="checkbox"/>
299	YES	YES	YES	YES	Fibromyalgia, bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
300	YES	YES	YES	YES	Asthma, Bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
301	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
302	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
304	YES	YES	YES	YES	Shortness of breath	<input type="checkbox"/>	<input type="checkbox"/>
305	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
306	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
307	YES	YES	YES	YES	Resp infections	<input type="checkbox"/>	<input type="checkbox"/>
308	YES	YES	YES	YES	Lung infections	<input type="checkbox"/>	<input type="checkbox"/>
309	YES	YES	YES	YES	Asthma	<input type="checkbox"/>	<input type="checkbox"/>
310	YES	YES	YES	No Answer		<input type="checkbox"/>	<input type="checkbox"/>
311	YES	YES	YES	YES	Asthma	<input type="checkbox"/>	<input type="checkbox"/>
312	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
313	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
314	NO	NO	NO	YES	Bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
315	YES	YES	YES	YES	Gall bladder/carpal tunnel	<input type="checkbox"/>	<input type="checkbox"/>
316	YES	YES	YES	YES	Asthma; lung spot	<input type="checkbox"/>	<input type="checkbox"/>
317	NO	YES	YES	NO	Spot/breast	<input type="checkbox"/>	<input type="checkbox"/>
318	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
319	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
320	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
321	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
322	YES	NO	NO	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
323	YES	YES	YES	YES	bladder cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
324	NO	NO	NO	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>
325	YES	YES	YES	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
326	YES	YES	YES	YES	headaches, nausea	<input type="checkbox"/>	<input type="checkbox"/>
327	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
328	YES	YES	YES	YES	Emphysema	<input checked="" type="checkbox"/>	<input type="checkbox"/>
329	NO	NO	NO	YES	Brochial buildup	<input type="checkbox"/>	<input type="checkbox"/>
330	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
331	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
332	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>
333	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
334	YES	NO	YES	YES	Bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
335	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
336	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
337	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
338	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
339	YES	NO	YES	YES	Castrocondritis	<input type="checkbox"/>	<input type="checkbox"/>
340	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
341	YES	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
342	YES	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
343	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
344	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
345	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
346	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
347	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
348	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
349	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
350	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
351	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
352	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
353	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
354	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
355	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
356	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
357	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
358						<input checked="" type="checkbox"/>	<input type="checkbox"/>
359	NO	YES	YES	NO	Headaches	<input type="checkbox"/>	<input type="checkbox"/>
360	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input checked="" type="checkbox"/>
361	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
362	YES	YES	YES	YES	cancer	<input type="checkbox"/>	<input type="checkbox"/>
363	NO	YES	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
364	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
365	YES	YES	YES	YES	Emphysema	<input checked="" type="checkbox"/>	<input type="checkbox"/>
366	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
367	NO	YES	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
368	YES	YES	YES	YES	Cancer	<input type="checkbox"/>	<input type="checkbox"/>
369	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
370	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
371	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
372	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
373	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
374	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
375	YES	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
376	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>
377	NO	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
378	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
379	YES	NO	YES	NO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
380	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
381	YES	NO	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
382	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
383	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
384	NO	NO	YES	YES	bronchitis, emphysema	<input checked="" type="checkbox"/>	<input type="checkbox"/>
385	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
386	NO	NO	YES	YES	spina bifida	<input type="checkbox"/>	<input type="checkbox"/>
387	NO	NO	NO	NO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
388	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
389	YES	YES	YES	YES	bronchial asthma	<input type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
390	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
391	YES	YES	YES	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
392	NO	NO	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
393	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
394	NO	NO	YES	YES	asthma	<input type="checkbox"/>	<input type="checkbox"/>
395	NONE	NONE	NONE	NONE		<input checked="" type="checkbox"/>	<input type="checkbox"/>
396	NO	YES	NO	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
397	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
398	YES	YES	NO	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
399	YES	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
400	YES	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
401	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
402	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>
403	YES	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
404	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
405	YES	YES	YES	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
406	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
407	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
408	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
409	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
410	NO	YES	NO	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
411	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
412	NO SWB	NO SWB	NO SWB	NO SWB		<input type="checkbox"/>	<input type="checkbox"/>
413	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
414	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
415	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
416	NO	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
417	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
418	NONE	NONE	NONE	NONE	NONE	<input type="checkbox"/>	<input type="checkbox"/>
419	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
420	YES	YES	YES	YES	anxiety/nerves	<input checked="" type="checkbox"/>	<input type="checkbox"/>
421	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
422	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
423	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
424	NO	YES	YES	NO	colon disease	<input type="checkbox"/>	<input type="checkbox"/>

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Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
425	YES	NO	NO	NO	diabetes/dialysis	<input type="checkbox"/>	<input type="checkbox"/>
426	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
427	NONE	NONE	NONE	NONE	NONE	<input type="checkbox"/>	<input type="checkbox"/>
428	NONE	NONE	NONE	NONE	NONE	<input type="checkbox"/>	<input type="checkbox"/>
429	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
430	YES	YES	YES	YES	asthma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
431	YES	YES	YES	YES	asthma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
432	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
433	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
434	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
435	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
436	NO	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
437	NO	YES	YES	YES	tumor/gland	<input type="checkbox"/>	<input type="checkbox"/>
438	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
439	YES	NO	YES	YES	asthma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
440	YES	YES	YES	YES	asthma	<input type="checkbox"/>	<input type="checkbox"/>
441	NO	YES	NO	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
442	YES	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
443	NO	NO	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
444	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
445	NO	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
446	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
447	NO	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
448	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
449	NO	NO	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
450	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
451	YES	NO	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
452	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
453	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
454	NONE	NONE	NONE	NONE	miscarriage	<input checked="" type="checkbox"/>	<input type="checkbox"/>
455	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
456	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
457	NONE	NONE	NONE	NONE		<input type="checkbox"/>	<input type="checkbox"/>
458	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>
459	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>

Appendix 3.

Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
460	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
461	NO	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
462	YES	YES	NO	YES	bronchitis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
463	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
464	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
465	NO	NO	YES	YES	asthma	<input type="checkbox"/>	<input type="checkbox"/>
466	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
467	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input checked="" type="checkbox"/>	<input type="checkbox"/>
468	NO INFO	NO INFO	NO INFO	NO INFO	NO INFO	<input type="checkbox"/>	<input type="checkbox"/>
469	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
470	YES	YES	YES	YES	asthma/breast cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
471	NO SWB INF	NO SWB INFO	NO SWB INFO	NO SWB INFO		<input type="checkbox"/>	<input type="checkbox"/>
472	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
473	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
474	YES	YES	YES	NO	cancer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
475	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
476	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
477	YES	YES	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
478	NO	NO	NO	YES		<input type="checkbox"/>	<input type="checkbox"/>
479	YES	YES	NO	NO		<input type="checkbox"/>	<input type="checkbox"/>
480	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
481	YES	YES	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
482	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
483	YES	YES	YES	YES		<input type="checkbox"/>	<input checked="" type="checkbox"/>
484	NO	NO	YES	NO		<input type="checkbox"/>	<input type="checkbox"/>
485	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
486	NO	NO	YES	NO	Cancer	<input type="checkbox"/>	<input type="checkbox"/>
487	No Answer	No Answer	No Answer	YES	Brochitis, asthma	<input type="checkbox"/>	<input type="checkbox"/>
488	YES	YES	YES	YES		<input type="checkbox"/>	<input type="checkbox"/>
489	YES	YES	YES	YES		<input checked="" type="checkbox"/>	<input type="checkbox"/>
490	NO	NO	NO	NO	STROKE/DEATH	<input type="checkbox"/>	<input type="checkbox"/>
491	YES	YES	YES	YES	cancer/death	<input type="checkbox"/>	<input type="checkbox"/>
492						<input type="checkbox"/>	<input type="checkbox"/>
493	NO	NO	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
494	NO INFO	NO INFO	NO INFO	NO INFO		<input type="checkbox"/>	<input type="checkbox"/>

Appendix 3.

Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
495	NO	NO	NO	NO	cramp/miscarriages	<input type="checkbox"/>	<input type="checkbox"/>
496	YES	YES	NO	YES	shortness of breath	<input type="checkbox"/>	<input type="checkbox"/>
497	YES	YES	YES	YES	bronchitis	<input type="checkbox"/>	<input type="checkbox"/>
498						<input type="checkbox"/>	<input type="checkbox"/>
499						<input type="checkbox"/>	<input type="checkbox"/>
500						<input type="checkbox"/>	<input type="checkbox"/>
501						<input type="checkbox"/>	<input type="checkbox"/>
502						<input type="checkbox"/>	<input type="checkbox"/>
503						<input type="checkbox"/>	<input type="checkbox"/>
504						<input type="checkbox"/>	<input type="checkbox"/>
505						<input type="checkbox"/>	<input type="checkbox"/>
506						<input type="checkbox"/>	<input type="checkbox"/>
507						<input type="checkbox"/>	<input type="checkbox"/>
508						<input type="checkbox"/>	<input type="checkbox"/>
509						<input type="checkbox"/>	<input type="checkbox"/>
510						<input type="checkbox"/>	<input type="checkbox"/>
511						<input type="checkbox"/>	<input type="checkbox"/>
512						<input type="checkbox"/>	<input type="checkbox"/>
513						<input type="checkbox"/>	<input type="checkbox"/>
514						<input type="checkbox"/>	<input type="checkbox"/>
515						<input type="checkbox"/>	<input type="checkbox"/>
516						<input type="checkbox"/>	<input type="checkbox"/>
517						<input type="checkbox"/>	<input type="checkbox"/>
518						<input type="checkbox"/>	<input type="checkbox"/>
519						<input type="checkbox"/>	<input type="checkbox"/>
520						<input type="checkbox"/>	<input type="checkbox"/>
521						<input type="checkbox"/>	<input type="checkbox"/>
522						<input type="checkbox"/>	<input type="checkbox"/>
523						<input type="checkbox"/>	<input type="checkbox"/>
524						<input type="checkbox"/>	<input type="checkbox"/>
525						<input type="checkbox"/>	<input type="checkbox"/>
526						<input type="checkbox"/>	<input type="checkbox"/>
527						<input type="checkbox"/>	<input type="checkbox"/>
528						<input type="checkbox"/>	<input type="checkbox"/>
529						<input type="checkbox"/>	<input type="checkbox"/>

Appendix 3.

Table 10. Symptoms, Smoking, and Exposure to Chemicals

ID	Burning Eyes	Sore Throat	Allergies	Respiratory	OTHER AILS	SMOKING	CHEMICALS
530						<input type="checkbox"/>	<input type="checkbox"/>
531						<input type="checkbox"/>	<input type="checkbox"/>
532						<input type="checkbox"/>	<input type="checkbox"/>
533	NO SWB	NO SWB	NO SWB	NO SWB		<input type="checkbox"/>	<input type="checkbox"/>
534	NO SWB	NO SWB	NO SWB	NO SWB		<input checked="" type="checkbox"/>	<input type="checkbox"/>
535	NO SWB	NO SWB	NO SWB	NO SWB		<input checked="" type="checkbox"/>	<input type="checkbox"/>
536	NO SWB	NO SWB	NO SWB	NO SWB		<input type="checkbox"/>	<input type="checkbox"/>
537	NO SWB	NO SWB	NO SWB	NO SWB		<input type="checkbox"/>	<input type="checkbox"/>
538						<input type="checkbox"/>	<input type="checkbox"/>
539						<input type="checkbox"/>	<input type="checkbox"/>
540						<input type="checkbox"/>	<input type="checkbox"/>
541						<input type="checkbox"/>	<input type="checkbox"/>
542						<input type="checkbox"/>	<input type="checkbox"/>
543						<input type="checkbox"/>	<input type="checkbox"/>
544						<input type="checkbox"/>	<input type="checkbox"/>
545						<input type="checkbox"/>	<input type="checkbox"/>
546						<input type="checkbox"/>	<input type="checkbox"/>
547						<input type="checkbox"/>	<input type="checkbox"/>
548						<input type="checkbox"/>	<input type="checkbox"/>
549						<input type="checkbox"/>	<input type="checkbox"/>
550						<input type="checkbox"/>	<input type="checkbox"/>
551						<input type="checkbox"/>	<input type="checkbox"/>
552						<input type="checkbox"/>	<input type="checkbox"/>
553						<input type="checkbox"/>	<input type="checkbox"/>
554						<input type="checkbox"/>	<input type="checkbox"/>
555						<input type="checkbox"/>	<input type="checkbox"/>
556						<input type="checkbox"/>	<input type="checkbox"/>

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
1	✓			Fisherman
2				South Central Bell
3		✓	asbestos, chlorine, titanium salt, mica wash	Kaiser
4			SUED???	Coach/Brother Martin; Sued Murphy Oil/Tenneco
5	✓	✓	Cleaning chemicals	Sheriff's office/elected constable, Typewriter Co.
6	✓	✓		Electrician
7	✓		???	Fireman
8				Nurse. 6pgs missing/claim form.
9		✓	Cautic, amine, gas, oil	Operator, Murphy Oil
10	✓			Corps of Eng/WPA
11		✓	asbestos	Zatarain's/Kaiser
12	✓			Electrician/Frischhertz Electric
13				Security/School Bd STB. No SWB health info.
14				Council on Aging/STB Library
15	✓			Schwegman's/Western Auto
16	✓		refinery	Mobil Oil/Chalmette Refinery
17				Homemaker
18	✓			Homemaker
19				Accounting/US Govt
20				Sears, Security Homestead
21	✓			Businessman/Dixie Welding
22				Boilermaker/Dixie Welding
23		✓	Various	Electrician/Armond Electric
24				Used Car Buyer
25	✓			Restaurant; Threeton daughter/info in Threeton file
26			2nd hand smoke	Catering
27				Retired; No occupation. Pg23 answers mixed up.
28				Print Production Mgr. (Chemicals??)
29		✓	Hair chemicals	Hairdresser/Hair chemicals
30				Clerical
31				Electrical Contractor
32		✓	Asbestos, cleaning chem, lead, others	Southern Scrap/Halter Marine
33	✓			Secretary, LFT Insurance
34			????/Domino	Domino Sugar/Children not involved (wrong)
35				Western Union
36				Electrician/Armond Electric
37	✓			Sheet Metal Worker/Amtrak/Plumbing Co(s)

Source: Author

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
38	<input type="checkbox"/>	<input type="checkbox"/>		Woodward Wright
39	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Zatarains/Bunny/US Navy
40	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Nurse
41	<input type="checkbox"/>	<input type="checkbox"/>		Medical Depts/Avondale/Hospitals/etc
42	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Housewife
43	<input type="checkbox"/>	<input checked="" type="checkbox"/>	oil refinery	BPR/Refinery Operator
44	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
45	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Harrah's/Sclafani's
46	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Sulphuric Acid	Domino Sugar, worked in lab
48	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	???	Doussan/Industrial Welding Supp
49	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Post Office
50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Don't know	Kaiser/Customs
51	<input type="checkbox"/>	<input type="checkbox"/>		Permanently disabled/unemployed
52	<input type="checkbox"/>	<input type="checkbox"/>		Railroad
53	<input type="checkbox"/>	<input type="checkbox"/>		Painter, Equit Shipyard, Calongne Med Supp
54	<input type="checkbox"/>	<input type="checkbox"/>		Confidential Transcriber/FBI
55	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Office Work/City Corps
56	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Freons	Electrician-RTA/worked in oil fields
57	<input type="checkbox"/>	<input type="checkbox"/>		City Hall
58	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Unemployed. Previously Sanitation Dept
59	<input type="checkbox"/>	<input type="checkbox"/>		Am Gen Finance
60	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos	Kaiser
61	<input type="checkbox"/>	<input type="checkbox"/>		Sales Clerk
62	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Naval Xchange/Schwegman's
63	<input type="checkbox"/>	<input type="checkbox"/>	2nd smoke/protective gear	Mechanic/Western Gas Resources
64	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Ret/STB Govt
65	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker/SSI. Lawsuits (same as father) Ironwrkrs
66	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos	Retired. Avondale/Holmes/Kaiser
67	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos,	Pipefitter/GA Shipping
68	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Schwegmann/Orleans Mop/Broom. Husband smoked 20 yr
69	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Insurance, Owner Equip. Co.
70	<input type="checkbox"/>	<input type="checkbox"/>		Meat Packing Co.
71	<input type="checkbox"/>	<input type="checkbox"/>		Teacher
72	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Financial Analyst/Entergy
73	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Retired/Woodward Wight
74	<input type="checkbox"/>	<input type="checkbox"/>		Tenneco Oil
75	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	asbestos, others	Mobil/Electrician

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
76	<input checked="" type="checkbox"/>			Corps of Eng
77	<input type="checkbox"/>			Retired; Ford Motor; Amstar
78	<input checked="" type="checkbox"/>	<input type="checkbox"/>	????	American Cyanamid
79	<input type="checkbox"/>		????	Marble Mason
80	<input type="checkbox"/>			Music Co.
81	<input type="checkbox"/>		?????	Retired from Murphy Oil
82	<input checked="" type="checkbox"/>			Jax Brewery worker
83	<input checked="" type="checkbox"/>			ODECO
84	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fire Dept	Stagehand/Fire Dept
85	<input type="checkbox"/>			Domino Sugar/Avondale
86	<input checked="" type="checkbox"/>			Shipfitter/Textron Marine
87	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Accountant at Mobil Oil
88	<input type="checkbox"/>		2nd Hand Smoke	Clerical/Sore throat ans different in Sanchez file
89	<input type="checkbox"/>			NO INFO RE DECEASED HUSBAND
90	<input type="checkbox"/>			Houston Natural Gas; Workmen's comp for injury
91	<input checked="" type="checkbox"/>		????	Navy, General Motors, Post Office
92	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Bleach chemicals	Unemployed; Employer Brite Mfg/fall on job/lawsuit.
93	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Tugboat captain; Conspiracy to distribute cocaine.
94		<input type="checkbox"/>		American General Insurance
95		<input type="checkbox"/>		Salesman/Kirschman's
96		<input checked="" type="checkbox"/>	various	Kaiser retiree
97		<input type="checkbox"/>		N/A??Body & Fender for two years
98	<input checked="" type="checkbox"/>		Page 2 missing	Precision Tools/Mfrg. Page 2. Missing.
99	<input type="checkbox"/>			Laid Off. Sporting Goods & Jewelry Store
100	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Unknown/dump	Mgr/Watkins Trucking
101	<input type="checkbox"/>			Mgr/N.O. Public Belt Railroad
102	<input checked="" type="checkbox"/>			Stagehand; 1975/1980 marijuana convictions
103	<input type="checkbox"/>			Retired from what????
104	<input checked="" type="checkbox"/>			Kirschmann's
105	<input type="checkbox"/>			U.S. Post Office
106	<input checked="" type="checkbox"/>			Health Aide
107	<input checked="" type="checkbox"/>			Office Mgr/Dale Shaw
108	<input type="checkbox"/>			Teacher's aide.
109	<input checked="" type="checkbox"/>			Glassworker
110	<input checked="" type="checkbox"/>			Mechanic
111	<input type="checkbox"/>			Pre-school teacher
112	<input checked="" type="checkbox"/>			Retired statistician/Amtrak

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
113	✓			Telephone co. installer. No health problems; odor
114				Dealer at Casinos; Fritz Maritime
115	✓	✓	??????	American Cyanamid Foreman
116	✓	✓	Asbestos	Railroad Engineer
117		✓	Don't know	Shell/Leader Operator
118			?????	Warehouseman/Mobil
119				Car Wash Manager
120	✓		???	Bulk handling area/Domino Sugar
121				Retired Teacher's Aide; Florist Ship. (Allergies!)
122				Quality Control Inspector/John Brown Engineers
123		✓	Sulfuric Acid	Head Lock Operator/Corps of Engineers
124				Produce Mgr/Schwegmann
125				Fisherman
126	✓			Carpenter/Lockheed Martin
127	✓			Shipfitter/Boh Bros/STB Parish
128	✓	✓	Asbestos	American Standard
129	✓			CSX Railroad
130				Homemaker
131				Groomer. DWI not on claim form/depo only
132		✓	Asbestos	Asbestos work Supt. (Only witness for lawsuit)
133	✓			Dunkin Donuts
134	✓			Electrical Helper/Contractors
135				Renovations/landlord
136				Retired Military. Wife refused info on spouse.???
137	✓			Conti Wax Museum
138				United Fruit/E.L.Frank
139	✓			Truck Driver/STB School; Smoking question wrong.
140		✓	Asbestos	Kaiser/Electrician
141	✓			Lockheed Martin
142	✓			Post Office
143			2nd hand smoke	Auto Mechanic
144				Retired RTA
145				Anheuser Busch
146	✓	✓		Electrician
147			Dark room??	Retired Photographer
148				Receptionist-Dr. Mayfield
149			Domino??	Security Guard-Domino Sugar

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
150	<input checked="" type="checkbox"/>			Fairmont
151	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Gasoline, Acid	Chevron Owner
152	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Sheriff's Office/STB
153	<input checked="" type="checkbox"/>			Wholesale seafood; traveled area for seafood
154	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Alcohol, peppermint	Dr. Tichenor's Antiseptic
155	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Boilermaker
157	<input type="checkbox"/>			FBI Secty
158	<input checked="" type="checkbox"/>			St. Bernard Sherriff's Office
159	<input checked="" type="checkbox"/>			Secty/Bowie Lumber
160	<input checked="" type="checkbox"/>			Freeman Dec/Stagehand
161	<input type="checkbox"/>			Contractor
162	<input checked="" type="checkbox"/>			Electrical Contractor
163	<input type="checkbox"/>	<input checked="" type="checkbox"/>	asbestos	Supvr/Kaiser. Lawsuit against Kaiser/asbestos.
164	<input checked="" type="checkbox"/>			(Mechanic-Bass Enterprise)
165	<input type="checkbox"/>			SCB; Schoenberger (no environmental pollutants)
166	<input type="checkbox"/>			Technical Rep, AM International
167	<input type="checkbox"/>			Eng Asst/Const Gang; Crime?; Sued lounge owner/lost
168	<input checked="" type="checkbox"/>			Mechanic/STB Parish
169	<input checked="" type="checkbox"/>			Housewife; smoking answered wrong.
170	<input type="checkbox"/>			?????
171	<input checked="" type="checkbox"/>			Retired SCB
172	<input checked="" type="checkbox"/>			Accountant/KBC Advanced Technologies. No education
173	<input checked="" type="checkbox"/>			Cab Driver
174	<input type="checkbox"/>		?????	Cascade Hairstyling
175	<input type="checkbox"/>			Office Clerk-Hansel Pettitin
176	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Oil	Iron Worker; Several lawsuits
177	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos	1st page missing from claim form.
178	<input type="checkbox"/>			Truck Loader/Jackson Brewery
179	<input type="checkbox"/>			Secty/Louis Dreyfus/Shell
180	<input checked="" type="checkbox"/>		?????	Retired (from what?)
181	<input checked="" type="checkbox"/>		2nd hand smoke	Defense Dept
182	<input type="checkbox"/>			Secty. Husband had lawsuit. Daughter bought house.
183	<input checked="" type="checkbox"/>			Custodian
184	<input type="checkbox"/>			Caterer
185	<input type="checkbox"/>			Electronic Tech
186	<input type="checkbox"/>			TV Broadcaster WLAE
187	<input type="checkbox"/>			fungus environmental/iteld; not smoke/ans no smoke

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
188	✓			Carpenter, Dixie Well Svc
189	✓			Homemaker/TP/Krauss/Randazzo's; Val atty/lawsuit
190				Adm. St. Bernard Schools
191			?????Hair	Beautician
192				Homemaker
193	✓			Driver
194	✓		????	V.P.Operations/Boland Marine
195		✓	Asbestos	Domino Sugar (asbestos), Auto Parts, Shell Station
196				Lykes Steamship
197	✓			Operator/SCB
198				Fidelity Homestead
199	✓	✓	Carbon Tetachloride	Chalmette Amusement
200			???	Kaiser, Brown Petroleum, Oil Reserve
201	✓			Driver
202				Barmaid
203				Security Guard
204	✓	✓	Asbestos	Carpenter
205	✓	✓	Acid Sulphur; others	Tenneco Oil
206	✓			Cashier - CSX Corp
207		✓	Infrequent salesman visits	Salesman, Chemical Plants; Dep Sheriff St. Bernard
208			???	A/C Ref Tech;Kaiser Alum;
209				X-Ray Technician
210				Graphic Designer; Minuteman Press
211	✓		????No Answer	Engineer, American Standard (No answer chemical)
212	✓		????Linen Svc	Owner, Arabi Linen (?? Chemical)
213	✓	✓	Benzyme	Construction Supt/Mobil Oil
214	✓			Bookkeeper
215				Retired frm Stratton/Baldwin
216	✓	✓	????	Aero Fire & Safety
217	✓	✓	Unknown	Iron Worker
218	✓			Retired Seaman; No answer to lawsuit question.
219				South Central Bell
220		✓	any hydrocarbon, gasoline, diesel	Mobil Oil, Tenneco, National Linene Service
221			2nd hand smoke	Mail Carrier
222		✓	Asbestos	Chalmette Music; Air pollution caused eye problems
223	✓		???Roofer	Roof Contractor
224	✓		????	Train Master; American Sugar Refinery

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
225	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2nd hand smoke	Social Security
226	<input type="checkbox"/>	<input type="checkbox"/>		Gulf Sales
227	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Dept of Human Resources - St. Bernard Parish
228	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sales; Quality Reconditioning
229	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
230	<input type="checkbox"/>	<input type="checkbox"/>	Paint???	Painter; Body Shop
231	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Unemployed. Bakery, Chips, Cab Company
232	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Furniture Delivery
233	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Fumes on job	Electrnc Tech/Hallburton; Complaints from job
234	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Bell South Technician
235	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
236	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Paint/Thinners	Operator, STB Water & Sewerage
237	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Commercial Fisherman
238	<input type="checkbox"/>	<input type="checkbox"/>		Secty-Judge Carr
239	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Bar Owner. Gambling w/o having a wagering stamp
240	<input type="checkbox"/>	<input type="checkbox"/>		Mechanic
241	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sears Delivery, SCB
242	<input type="checkbox"/>	<input type="checkbox"/>		Mgr. Grant's
243	<input type="checkbox"/>	<input type="checkbox"/>		Financial Examiner
245	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
246	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sales, General Mills Supply
247	<input type="checkbox"/>	<input checked="" type="checkbox"/>		USDA, UNO Professor, No Health info
248	<input checked="" type="checkbox"/>	<input type="checkbox"/>	???	Plant Mgr./Quality Manufacture
249	<input type="checkbox"/>	<input type="checkbox"/>		Foreman at Port
250	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Loan Svc Asst
251	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Warehouseman, STB Water Board; Pharmacy Clerk
252	<input type="checkbox"/>	<input type="checkbox"/>		Adm Asst. - First Commerce
253	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Notarial Secty-Sidney Torres
254	<input type="checkbox"/>	<input type="checkbox"/>		Teller/Loan Officer-Mobil Oil Credit Union
255	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Pager Mgr-Electrocom
256	<input type="checkbox"/>	<input type="checkbox"/>		Civil Service Clerk
257	<input type="checkbox"/>	<input type="checkbox"/>		
258	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Siding w/GNO Home Improvements
259	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Key Accounting-USDA
260	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
261	<input type="checkbox"/>	<input type="checkbox"/>		
262	<input type="checkbox"/>	<input type="checkbox"/>		Insurance Companies

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
263	<input checked="" type="checkbox"/>			Student
264				
265	<input type="checkbox"/>			
266	<input type="checkbox"/>			
267	<input type="checkbox"/>			Homemaker
268	<input checked="" type="checkbox"/>			LPN
269	<input type="checkbox"/>			
270	<input checked="" type="checkbox"/>			Co-owner Chalmette Amusement.
271				Machine Operator, Schneider Paper
272	<input type="checkbox"/>			Customer Svc/West Building; Val handled auto suit
273				Slip/fall at hair tech.
274	<input checked="" type="checkbox"/>			RN
275	<input checked="" type="checkbox"/>			Co-owner PakWrap
276				Clerk-Simon Hubig
277	<input type="checkbox"/>			Warehouse (Sewing)
278	<input type="checkbox"/>			RN
279	<input checked="" type="checkbox"/>			Dillard's
280	<input checked="" type="checkbox"/>			Machinist/Equitable engineering
281	<input checked="" type="checkbox"/>			Housewife
282	<input type="checkbox"/>			Homemaker
283				Bar Owner
284	<input type="checkbox"/>			
285	<input checked="" type="checkbox"/>			Homemaker
286	<input checked="" type="checkbox"/>			Homemaker
287	<input checked="" type="checkbox"/>		???	Computer Operator, Peerless Printing
288	<input checked="" type="checkbox"/>			Homemaker
289	<input type="checkbox"/>		Chalmette Medical	Dietary??
290	<input type="checkbox"/>			Homemaker
291				Homemaker
292	<input type="checkbox"/>			Homemaker
293	<input type="checkbox"/>			NO INFO
294				Housewife
295				Pipebender, N.O. CopperWorks
296	<input checked="" type="checkbox"/>			Homemaker
297	<input checked="" type="checkbox"/>			Kellums' symptoms started before moved in.
298				Homemaker
299				Student

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
300	<input type="checkbox"/>	<input type="checkbox"/>		Student
301	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker, No Dr. but Dr. told her SWB cause.
302	<input type="checkbox"/>	<input type="checkbox"/>		Clerk-CSX Corp
304	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
305	<input type="checkbox"/>	<input type="checkbox"/>		St. Bernard Voice
306	<input type="checkbox"/>	<input type="checkbox"/>		Seamstress
307	<input type="checkbox"/>	<input type="checkbox"/>		Computer Drafter
308	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
309	<input type="checkbox"/>	<input type="checkbox"/>		Billing Clerk (Assoc Mov & Storage)
310	<input type="checkbox"/>	<input type="checkbox"/>		Pharmacy Tech (St. Bernard Drugs)
311	<input type="checkbox"/>	<input type="checkbox"/>		Student
312	<input type="checkbox"/>	<input type="checkbox"/>		No Answer
313	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Stuck in elevator (settled)
314	<input type="checkbox"/>	<input type="checkbox"/>		Loan Officer
315	<input type="checkbox"/>	<input type="checkbox"/>		Teacher
316	<input type="checkbox"/>	<input type="checkbox"/>		Housewife/married 4x/moved to Oklahoma
317	<input type="checkbox"/>	<input type="checkbox"/>		Underwriter/Home Life
318	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
319	<input checked="" type="checkbox"/>	<input type="checkbox"/>	????	Homemaker; Cleaners, Maison Blanche, Bell Telepho
320	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
321	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Office Mgr/Corregated Industries
322	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
323	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
324	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Surg disinfects	Nurse
325	<input checked="" type="checkbox"/>	<input type="checkbox"/>	?????	National Linen Service
326	<input type="checkbox"/>	<input type="checkbox"/>		Payroll Tech/Fed Govt
327	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker/SCB
328	<input checked="" type="checkbox"/>	<input type="checkbox"/>		South Central Bell
329	<input type="checkbox"/>	<input type="checkbox"/>		Secty/Hodges Stock Yards, United Rice Mills
330	<input type="checkbox"/>	<input type="checkbox"/>		Housewife
331	<input type="checkbox"/>	<input type="checkbox"/>		Foreman/Port of N.O.
332	<input type="checkbox"/>	<input type="checkbox"/>		NO INFO; Ocman/Robertson related; House price??
333	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
334	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
335	<input type="checkbox"/>	<input type="checkbox"/>		Housewife
336	<input type="checkbox"/>	<input type="checkbox"/>		Dietetic Technician
337	<input type="checkbox"/>	<input type="checkbox"/>	?????	Gen. Electric; Navy (no position given)

Appendix 4.
Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
338	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
339	<input type="checkbox"/>	<input type="checkbox"/>		Army
340	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Surveyor's Apprentice/Estopinal
341	<input type="checkbox"/>	<input type="checkbox"/>		No Answer
342	<input type="checkbox"/>	<input type="checkbox"/>		Minor child
343	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
344	<input type="checkbox"/>	<input type="checkbox"/>		Day Care Worker
345	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Waitress/Hooters
346	<input type="checkbox"/>	<input type="checkbox"/>		Student
347	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
348	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
349	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Ret. (Luzianne, Tasso Plantation, USDA)
350	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sure Side Services (Johanna Spicuzza file)
351	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Eckerd's
352	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Waitress/Sclafani's; NO HEALTH INFO SWB, ONLY BFI
353	<input type="checkbox"/>	<input type="checkbox"/>		Minor. No info SWB only BFI
354	<input type="checkbox"/>	<input type="checkbox"/>		Minor. No info SWB only BFI
355	<input type="checkbox"/>	<input type="checkbox"/>		Food Svc Mgr/STB School Board
356	<input type="checkbox"/>	<input type="checkbox"/>		Helper/Albach Co.
357	<input type="checkbox"/>	<input type="checkbox"/>		Pharm Tech/Walmart
358	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Retired from ???	No SWB Symptoms Completed
359	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
360	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos	Insulator
361	<input type="checkbox"/>	<input type="checkbox"/>		NO INFO
362	<input type="checkbox"/>	<input type="checkbox"/>	????	Homemaker, Asst. Hair Stylist
363	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
364	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
365	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker, Nanny
366	<input type="checkbox"/>	<input type="checkbox"/>	?????	Geological Tech/Taylor Energy
367	<input type="checkbox"/>	<input type="checkbox"/>		Minor/student
368	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
369	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
370	<input type="checkbox"/>	<input type="checkbox"/>		Teacher/Chalmette High
371	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Landmark Hotel
372	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Universal Consulting Inc.
373	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Johnson & Johnson
374	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Student

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
375	<input type="checkbox"/>	<input type="checkbox"/>		Student
376	<input type="checkbox"/>	<input type="checkbox"/>		secretary
377	<input type="checkbox"/>	<input type="checkbox"/>		Student
378	<input type="checkbox"/>	<input type="checkbox"/>		Surgical tech/Lakeland
379	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Various	Environmental Asst/Mobil Oil
380	<input type="checkbox"/>	<input type="checkbox"/>		Paralegal/Gordon & Austin
381	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Chef/N.O.Hilton (28yr old???)
382	<input type="checkbox"/>	<input type="checkbox"/>		Retired statistician/Amtrak. Class action/Betsy.
383	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Unemployed
384	<input checked="" type="checkbox"/>	<input type="checkbox"/>	?????	Maintenance/Chalmette Medical
385	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
386	<input type="checkbox"/>	<input type="checkbox"/>		Minor child/disabled
387	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Asbestos	Iron worker/Domino Sugar/Amtrak/Avondale/L.A.
388	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
389	<input type="checkbox"/>	<input type="checkbox"/>	????	Marketing/Century Graphics
390	<input type="checkbox"/>	<input type="checkbox"/>	NO INFO	NO INFO ON DONALD JR. AT ALL
391	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
392	<input type="checkbox"/>	<input type="checkbox"/>		Research Specialist/SE Medical Alliance
393	<input type="checkbox"/>	<input type="checkbox"/>		Minor/Student
394	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
395	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Bell South/Nat'l Health Laboratories
396	<input type="checkbox"/>	<input type="checkbox"/>		Civil Engineer/Buchart Horn
397	<input type="checkbox"/>	<input type="checkbox"/>		Library Asst/SMU TX
398	<input type="checkbox"/>	<input type="checkbox"/>		Went from all kinds of security jobs to deli clerk
399	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
400	<input type="checkbox"/>	<input type="checkbox"/>		Janitorial/STB School BD/Schwegmann
401	<input type="checkbox"/>	<input type="checkbox"/>		Minor/Student
402	<input type="checkbox"/>	<input type="checkbox"/>	NO INFO	Conflicting health answers/Myrtle no info/see abov
403	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
404	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	at Construction sites	Electrician/Armand Electric
405	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Disability/USDA Nat'l Finance Center
406	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sued neighbor for killing migrating birds.
407	<input type="checkbox"/>	<input type="checkbox"/>		Secty
408	<input type="checkbox"/>	<input type="checkbox"/>		Student/UNO
409	<input type="checkbox"/>	<input type="checkbox"/>		Student/UNO
410	<input type="checkbox"/>	<input type="checkbox"/>		Merchandiser/American Greeting
411	<input type="checkbox"/>	<input type="checkbox"/>		Stage Hand

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
412				Housewife/Daughter of Hiltons
413				Sub Teacher/STB Schools
414				Cafeteria Worker
415	✓			Homemaker
416				Clerk/Crescent City Dodge
417	✓			Cashier/Winn Dixie
418				Minor/Student
419				Minor/Student
420	✓		????	American Sugar Refinery
421				Dir.Regious Ed/St. Louise deMerillac
422				Mother believes dump caused children's health prob
423				Mother/dump caused children's health problems.
424				Secty/LA Tax Commission
425				Homemaker. Indicates Bertucci retired. Not true.
426				River Pilot
427				Homemaker
428				Student; Siblings aren't plaintiffs.
429			????	Patient Rep in Hospitals
430	✓			Armed Robbery
431	✓			Homemaker
432				Student
433				Homemaker
434				Student
435				Student/Laborer
436				Student
437				Student
438				Daycare Provider
439	✓			Homemaker; A long list of doctors.
440				Retired Bookkeeper
441	✓			Homemaker
442				Driver
443				Office mgr/Dr. Vogt
444				NO INFO
445	✓			Cleans houses. Doesn't remember details of lawsuit
446				NO INFO
447				Student???No info
448			????workplaces	Mechanic/Shell, Lanier, Am Marine, USAF

Appendix 4.
Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
449	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
450	<input type="checkbox"/>	<input type="checkbox"/>		Retired cashier
451	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Cook/Archdiocese N.O.
452	<input type="checkbox"/>	<input type="checkbox"/>		No sore throats after tonsils removed.
453	<input type="checkbox"/>	<input type="checkbox"/>		Minor/student
454	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Bookkeeper/TLC Services
455	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Teacher's Aide
456	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Minor/Student
457	<input type="checkbox"/>	<input type="checkbox"/>		Retired City/State
458	<input type="checkbox"/>	<input type="checkbox"/>		NO INFO
459	<input type="checkbox"/>	<input type="checkbox"/>		NO INFO. Extra health info in file for ???
460	<input type="checkbox"/>	<input type="checkbox"/>		Accountant
461	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Asst. Tech/Chalmette Medical Center
462	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Retired/Woolco
463	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Asst VP/Whitney
464	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker/Retired ???
465	<input type="checkbox"/>	<input type="checkbox"/>		Retired/SWB
466	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Homemaker
467	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Mgr. K-Mart
468	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	unemployed
469	<input type="checkbox"/>	<input type="checkbox"/>		Retired/STB School Board
470	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Retired Clerical
471	<input type="checkbox"/>	<input type="checkbox"/>		Computer Tech/Convention Center
472	<input type="checkbox"/>	<input type="checkbox"/>		Journal of Commerce
473	<input type="checkbox"/>	<input type="checkbox"/>		Engineer/STB Fire Dept
474	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NO INFO	N/A???
475	<input type="checkbox"/>	<input type="checkbox"/>	florist???	Florist
476	<input type="checkbox"/>	<input type="checkbox"/>		Clerk/Federal Reserve Bank
477	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Mgr/Shoe World
478	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Bookkeeper/Federal Reserve
479	<input type="checkbox"/>	<input type="checkbox"/>		Pharmacy Clerk
480	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Homemaker
481	<input type="checkbox"/>	<input type="checkbox"/>		Homemaker
482	<input type="checkbox"/>	<input type="checkbox"/>		Traffic Reporter
483	<input type="checkbox"/>	<input checked="" type="checkbox"/>	asbestos	Rheem Mfg.
484	<input type="checkbox"/>	<input type="checkbox"/>	????	Benefits Analysis; Sued Tenneco w/husband
485	<input type="checkbox"/>	<input type="checkbox"/>		Retired Seamstress

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
486	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Nurse
487	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Student
488	<input type="checkbox"/>	<input type="checkbox"/>		Retail Loan/Hibernia
489	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Sales Rep/USDA
490	<input type="checkbox"/>	<input type="checkbox"/>		No SWB Health info; no smoking info
491	<input type="checkbox"/>	<input type="checkbox"/>	???	Retired/from what???
492	<input type="checkbox"/>	<input type="checkbox"/>		
493	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produce Mgr/Jubilee Foods
494	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Student
495	<input type="checkbox"/>	<input type="checkbox"/>		Asst Mgr/Fidelity
496	<input type="checkbox"/>	<input type="checkbox"/>	????Kaiser	Restaurant Mgr/Previously at Kaiser
497	<input type="checkbox"/>	<input type="checkbox"/>		Retired computer asst/Navy
498	<input type="checkbox"/>	<input type="checkbox"/>		
499	<input type="checkbox"/>	<input type="checkbox"/>		
500	<input type="checkbox"/>	<input type="checkbox"/>		
501	<input type="checkbox"/>	<input type="checkbox"/>		
502	<input type="checkbox"/>	<input type="checkbox"/>		
503	<input type="checkbox"/>	<input type="checkbox"/>		
504	<input type="checkbox"/>	<input type="checkbox"/>		
505	<input type="checkbox"/>	<input type="checkbox"/>		
506	<input type="checkbox"/>	<input type="checkbox"/>		
507	<input type="checkbox"/>	<input type="checkbox"/>		
508	<input type="checkbox"/>	<input type="checkbox"/>		
509	<input type="checkbox"/>	<input type="checkbox"/>		
510	<input type="checkbox"/>	<input type="checkbox"/>		
511	<input type="checkbox"/>	<input type="checkbox"/>		
512	<input type="checkbox"/>	<input type="checkbox"/>		
513	<input type="checkbox"/>	<input type="checkbox"/>		
514	<input type="checkbox"/>	<input type="checkbox"/>		
515	<input type="checkbox"/>	<input type="checkbox"/>		
516	<input type="checkbox"/>	<input type="checkbox"/>		
517	<input type="checkbox"/>	<input type="checkbox"/>		
518	<input type="checkbox"/>	<input type="checkbox"/>		
519	<input type="checkbox"/>	<input type="checkbox"/>		
520	<input type="checkbox"/>	<input type="checkbox"/>		
521	<input type="checkbox"/>	<input type="checkbox"/>		
522	<input type="checkbox"/>	<input type="checkbox"/>		

Appendix 4.

Table 11. Plaintiff's Workplace, Smoking Habits, Exposure to Chemicals

ID	SMOKING	CHEMICALS	Chemical 1	WORKPLACE
523	<input type="checkbox"/>	<input type="checkbox"/>		
524	<input type="checkbox"/>	<input type="checkbox"/>		
525	<input type="checkbox"/>	<input type="checkbox"/>		
526	<input type="checkbox"/>	<input type="checkbox"/>		
527	<input type="checkbox"/>	<input type="checkbox"/>		
528	<input type="checkbox"/>	<input type="checkbox"/>		
529	<input type="checkbox"/>	<input type="checkbox"/>		
530	<input type="checkbox"/>	<input type="checkbox"/>		
531	<input type="checkbox"/>	<input type="checkbox"/>		
532	<input type="checkbox"/>	<input type="checkbox"/>		
533	<input type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Dietician, U.S. Army
534	<input checked="" type="checkbox"/>	<input type="checkbox"/>		No Answer
535	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2nd hand smoke	Smoking since 1/98
536	<input type="checkbox"/>	<input type="checkbox"/>		
537	<input type="checkbox"/>	<input type="checkbox"/>		
538	<input type="checkbox"/>	<input type="checkbox"/>		
539	<input type="checkbox"/>	<input type="checkbox"/>		
540	<input type="checkbox"/>	<input type="checkbox"/>		
541	<input type="checkbox"/>	<input type="checkbox"/>		
542	<input type="checkbox"/>	<input type="checkbox"/>		
543	<input type="checkbox"/>	<input type="checkbox"/>		
544	<input type="checkbox"/>	<input type="checkbox"/>		
545	<input type="checkbox"/>	<input type="checkbox"/>		
546	<input type="checkbox"/>	<input type="checkbox"/>		
547	<input type="checkbox"/>	<input type="checkbox"/>		
548	<input type="checkbox"/>	<input type="checkbox"/>		
549	<input type="checkbox"/>	<input type="checkbox"/>		
550	<input type="checkbox"/>	<input type="checkbox"/>		
551	<input type="checkbox"/>	<input type="checkbox"/>		
552	<input type="checkbox"/>	<input type="checkbox"/>		
553	<input type="checkbox"/>	<input type="checkbox"/>		
554	<input type="checkbox"/>	<input type="checkbox"/>		
555	<input type="checkbox"/>	<input type="checkbox"/>		
556	<input type="checkbox"/>	<input type="checkbox"/>		

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

ID	SYMPTOMS	SWB IMPACT DATE	Last Complaint Date
1	Late 70s	UNSURE	1993
2		1970	
3	late 1980s	1980s	still occurs
4	childhood	1985	still occurs
5	1970s	1970s	early 1990s
6		LATE 70s-1993	
7	mid 1980s	1980s	1992/93
8	1980	1980s	1993
9	1985	1984	1993
10	1988	DON'T KNOW	1993
11	1990	1988	1990
12	mid 1980s	1986	still occurs
13	1969	1980	still occurs
14	Don't know	DON'T KNOW	
15	1980s	1980	still occurs
16	mid 1980s	1980s	still occurs
17	1982	1980s	still occurs
18	mid 1980s	1980s	still occurs
19	1980s	1980s	still occurs
20	1980/1990	1980s	still occurs
21	1979/Hattie St	late 1970s	still occurs
22	late 1980s	1980s	still occurs
23	late 1970s	late 1970s/1980s	1997
24	1967	1980S	still occurs
25	1980s	DON'T KNOW	still occurs
26	1983	1994	1993
27	1985	1980s-1993	1993/still occurs
28	NONE	1980	
29	1990	NO ANSWER	still occurs
30	1985	1985	No Answer
31	N/A SWB	NO ANSWER	N/A SWB
32	mid 1980s	1980s	still occurs
33	mid 1980s	DON'T KNOW	??/still occurs
34	NONE	NO ANSWER	NONE
35	NONE	NO ANSWER	NONE
36		1980s	

Source: Author

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

37	NONE	1980s	NONE
38	late 1970s	1966	still occurs
39	1992	1988	still occurs
40	1980	1980	1986/still
41		1970s	
42	1975	1975	still occurs
43	1980s	1980s	still occurs
44	early 1970s	1970s/1980s	early 1990s
45	late 1980s	1981	1993
46	1991	NO ANSWER	1997
48	1987	1970s	1993
49	1979	1980s	still occurs
50	?????	late 1979	still occurs
51	1979	1980s	don't know
52	1987	1980s	still occurs
53	NONE	1980s/O-1973/E	NONE
54	1984	1980s	still occurs
55	1980s	1980	1993
56	1989	NO ANSWER	1993/still occurs
57		1980s	
58	1973	late 1970s/early 1980s	still occurs
59	early 1990s	1980s/O-1970s/E	still occurs
60	late 1970s	1970s	still occurs
61	late 1970s	late 1960s	when dump closed
62	1970s	late 1970s/early 1980s	still occurs
63	1980	1970s/O-1980s/E	1992/still occurs
64	1980s	1987	1992
65	1977	1980s	still occurs
66	late 1970s/early 1980s	1980s	mid 90s/still
67	1980s	1980s	still occurs
68	early 1980s	NO ANSWER	1993
69	1980	late 1970s	still occurs
70	early 1980s	NO ANSWER	1993/dump closed
71	early 1970s	NO ANSWER	1993/still occurs
72	1987	1993	still occurs
73	1980s	1980s	still occurs
74		late 1970s	

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

75	1980s	1980s	1993
76	?????	UNSURE	1995/death
77	1980s	1980s	still occurs
78	1970s	1980s	still occurs
79	1960s	1980s	still occurs
80	1987	1970s/O-??/E	1993/still occurs
81	1974	1980s	N/a
82	1982	late 1970s/1980s	1997/death
83	1990	1980s	1993
84	1980	1980s	
85		NO ANSWER	
86	1989	1989	1993/still occurs
87	1980s	1984	still occurs
88	1985	1985	still occurs
89	NO SWB	1980s	NO SWB INFO
90	1987	1980s	1993
91	????	late 1970s/1980s-O/1980s-E	????
92	DON'T KNOW	1980s	still occurs
93	1980s	1980s	still occurs
94	1980s	1980s	1990 (death)
95	late 1980s	1980s	1991/moved
96	late 1970s	1980s	1993
97	1983	1980s	1994/death
98	late 1970s	1980s	1981
99	1980s	1980s	1993
100	1981	1980s	still occurs
101	1970s	late 1970s	still occurs
102	late 1970s	1980s	still occurs
103	1980s	late 1970s	1993
104	1980s	1980s	1993 or N/A ??
105	1986	1980s	1994
106		1980s	
107	1985	1980s	still occurs
108	1979	1980s	still occurs
109	1989	1980s	still occurs
110	early 1980s	1980s	still occurs
111	1980s	late 1970s/early 1980s	1993/still occurs

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

112	1980s	1980s	1993
113	None	1980s	N/A
114	late 1970s	late 1970s	still occurs
115	early 1980s	1980s	1993/death
116	late 1970s	1980s	1993/still occurs
117	1987	1980s	1993
118	NO INFO	1980s	NO INFO
119	???	1980s	still occurs
120	1980s	1980s	1993
121	No Answer	late 1970s	????
122	1990	1980s	still occurs
123	1989	1980	still occurs
124	CHILDHOOD	1980s	still occurs
125	mid 1980s	1980s	still occurs
126	CHILD/1980s	1980s	still occurs
127	NO INFO	1980s	NO INFO
128	mid 1980s	mid 1980s	still occurs
129	1988	1988	1993
130	late 1970s	late 1970s	1994
131	mid 1980s	mid 1980s	early 1990s
132	1980	1980s	1993
133	mid 1980s	1980s	1991
134	1970S	1970s	1995/Texas
135	early 1980s	early 1980s	still occurs
136	?????	1980s	No Answer
137	1985	1973	still occurs
138	NONE	1970/early 1980s	n/a
139	1989	Don't know	No Answer
140	1980s	mid 1980s	still occurs
141	NONE	Don't know	NONE
142	early 1980s	late 1970s/1980s	still occurs
143	1987	late 1980s	1994
144	1980s	1970s; Worse 1980s	1993
145	1980s	1980	1993
146		1970s	
147	1980s	mid 1980s	still occurs
148	1987	late 1970s/1980s	still occurs

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

149	1988	late 1980s	1993/still
150	1980s	late 1970s/1980s	still occurs
151	late 1970s	1980s	still occurs
152	early 1980s	1980s	
153	late 1970s	late 1970s/1980s	death
154	late 1970s	late 1970s	still occurs
155	1970s	late 1970s/1980s	1990s
157	1989	1987	no answer
158	early 1980s	1980	still occurs
159	1981	late 1970s	still occurs
160	late 1970s	late 1980s	still occurs
161	1985	late 1970s/1980s	1993
162	1980s	late 1970s	still occurs
163	1970s	1980s	1996/death
164	1978	1978-1980s	still occurs
165	1989	1980s	1993/still occurs
166	1989	1980s	
167	late 1970s	1980s	still occurs
168	1982	early 1990s	still occurs
169	late 1980s	late 1970s	still occurs
170	late 1980s	1985	1994/death
171	1964	1970	1996
172	1989	1989	1993
173	1980s	1980s	1994
174	1980s	mid1970s/1980s	still occurs
175	1990	1980s	1995
176	1980s	1980s	1993
556			
177	NONE	late 1970s	N/A
178	1984	1970s	still occurs
179	mid 1980s	1980s	still occurs
180	1989	late 1970s	1993
181	mid 1970s	mid1970s	still occurs
182	mid 1980d	1980s	1992/rarely now
183	1980	late 1970s	N/A
184	1980s	1980	1993/still occurs
185	1985	1980s	still occurs

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

186	late 1970s	LATE 1970s	1990/still occurs
187	late 1970s	mid 1970s	still occurs
188	mid 1980s	late 1980s	1992/moved
189	1980s	1980S	still occurs
190	mid 1980s	mid 1980s	still occurs
191	1980s	1980S	????
192	1980s	1980S	1993
193	no info	NO INFORMATION	
194	early 1980s	1980S	1994/1997
195	1980s	1984	still occurs
196	1980s	1980s	still occurs
197	1969	mid 1970s	1992/death
198	1988	1980s	still occurs
199	1978	mid 1980s	still occurs
200	NONE	1980	N/A
201	don't know	1980S	still occurs
202	NO INFO	LATE 1970S	no info
203	1980s	1980S	still occurs
204	1980s	1980S	1993
205	1980s	1980S	1994/still occurs
206	NONE	1980S	N/A
207	mid 1970s	mid 1970s	1993/5
208	late 1970s	late 1980s	No Answer
209	early 1980s	1980s	1990/moved
210	late 1970s		
211	1987	1980s	1993
212	childhood	???? (Can't recall odors)	still occurs
213	mid 1980s	1986	1989/still occurs
214	1979	1970s	1993
215	1980s	1980s	N/A
216	1970s	1980s	1997/death
217	1980s	1980s	1993
218	NO INFO	early 1980s	NO INFO
219		1980s	
220	1978	1980s	still occurs
221	1990	MID 1980s	No Answer
222	1984/1993	MID 1980s	still occurs

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

223	NO INFO	LATE 1970S/1980s	NO INFO
224	late 1970s	MID 1970s/1980s	still occurs
225	1969	late 1970s/early 1980s	still occurs
226	NONE	1980s	NONE
227	1980	1980s	still occurs
228	1985	mid 1980s	1993
229	late 1980s	late 1980s	still occurs
230	1987	1987	1995/moved
231	1987	1987	1989
232		1980s	
233	late 1980s	1989	still occurs
235	1980s	1980s	death
234	late 1970s	MID 1980s	still occurs
242	late 1970s	1980	still occurs
464	1988		1993/subsided
236	NONE	1980s	
237	1978	1980s	1993/still occurs
238	late 1980s	1980s	still occurs
239	NO INFO	late 1970s	
240	1991	1980s	still occurs
241	1987	early 1980s	still occurs
280	NO ANSWER	1980s	N/A
264	NONE	NO INFO	
253	1980s	mid 1980s	still occurs
254	Late 1970s		1993/still occur
255	NO INFO		NO INFO
256	mid 1980s	1980s	1996 (D)
257	NONE		
258	1980s	mid 1980s	still occurs
259	1980	mid 1980s	1993/still
260	1980s	late 1980s	early 90s/still
261	NO INFO		NO INFO
262	late 1960s	late 1970s/early 1980s	1994 (D)
263	NONE	NO INFO	
440	1988		1993/still occurs
265	NONE	NO INFO	
266	NONE	NO INFO	

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

267	1984	Late 1970s-1980s	UNTIL DEATH
277	1980		still occurs
268	mid 1980s	1984	still occurs
269	1984	1984	still occurs
270	NO INFO		
271	1973		still occurs
272	1983		still occurs
273	1985		
274	mid 1980s		don't know
275	early 1980s		still occurs
243	NONE	1981	NONE
245	1980s	early 1970s	still occurs
246	NO INFO	1980s	???
247	NO INFO	1980s	NO INFO
248	late 1960s	1980	still occurs
249	mid 1980s	1980s	
250	1981	1980s	still occurs
251	mid 1980s	early 1980s	still occurs
252	mid 1980s	mid 1980s	
276	don't know		still occurs
278	1988		still occurs
279	late 1970s		still occurs
315	late 1970s		still occurs
282	1970S		still occurs
283	1970s		still occurs
284	late 1970s		1994/death
285	NONE		N/A
286	1989		1995/death
287	1980		still occurs
288	late 1970s		still occurs
289	NO INFO		NO INFO
290	1989		1993
291	late 1970s		still occurs
292	1987		still occurs
293	NO SWB		NO SWB
294	1980s		1993
295	NONE	1982	NONE

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

296	mid 1980s		1993
297	1986		1993
298	1986		1993/still occurs
299	1986		1993
300	1987		
301	late 1970s		1994/moved
302	N/A		N/A
304	1988		still occurs
305	1984		1994
306	1991		still occurs
307	1985		early 1990s
308	late 1970s		1993
309	1980s		still occurs
310	early 1980s		still occurs
311	1980s		still occurs
312	1987		1993
313	1980s		
314	childhood		still occurs
281	No Answer	1980s	1991/death
316	1980	1980s	still occurs
317	childhood		still occurs
318	1985		still occurs
319	1980s		still occurs
320	1982		still occurs
321	1986		still occurs
322	1980s		still occurs
323	1983		still occurs
324	NONE		NONE
325	late 1970s		still occurs
326	1985		1993
327	None		N/A
328	????		still occurs
329	1982		still occurs
330	????		still occurs
331	mid 1980s	1980s	still occurs
332	NO INFO		NO INFO
333	1987		1995/moved

Appendix 5.

Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

334	1987		1998/death
335	early 1980s		still occurs
336	1987		1993/written in later
337	1984	mid 1980s	1995/moved
338	1984		1995/moved
339	1989		1993/lessened
340	1989		1993/lessened
341	1989		still occurs
342	1989		still occurs
343	late 1980s	NO INFO	still occurs
344	1978		still occurs
345	1978		still occurs
346	1982/BIRTH		still occurs
347	late 1970s		1994
348	1989		1995/death
349	mid 1980s		early 1990s
350	1976		1996/still occurs
351	1980s		still occurs
352	1985		1993
353	1985		1993
354	1989/birth		1993
355	1980s		1993
356	1985		1993
357	late 1970s		1993/still occurs
358			
359	1984		1993
360	NO INFO		NO INFO
361	NO INFO		NO INFO
362	1980s		1993/still occurs
363	1980s		still occurs
364	1987		1993
365	????		????
366	mid 1980s		1993/still occurs
367	1988		1993/still occurs
368	mid 1980s		1997/still occurs
369	1988		still occurs
370	mid 1980s		1995

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Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

371	1987		still occurs
372	1980		still occurs
373	1980		still occurs
374	BIRTH		still occurs
375	1980		still occurs
376	NO INFO		NO INFO
377	1981		still occurs
378	early 1980s		DON'T KNOW/ODORS STOPPED
379	late 1980s		1993
380	NONE		NONE
381	???		still occurs
382	1980s		1993/still occurs
383	late 1970s		???
384	1987		still occurs
385	early 1980s		still occurs
386	1980s		still occurs
387	NONE		NONE
388	1968/1987		still occurs
389	1987		still occurs
390	NO INFO		NO INFO
391	mid 1980s		still occurs
392	mid 1980s		still occurs
393	1988		still occurs
394	1980		still occurs
395	NONE		NONE
396	mid 1980s		still occurs
397	NONE		NONE
398	1984		still occurs
399	DON'T KNOW		still occurs
400	1984		1993
401	1989		still occurs
402	NO INFO		NO INFO
403	1970s		still occurs
404	1988	late 1970s/mid 1980s	still occurs
405	1980s		still occurs
406	1978		still occurs
407	1974		still occurs

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Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

408	late 1970s		still occurs
409	early 1980s		still occurs
410	1990		don't know
411	1991		still occurs
412	NO SWB		NO SWB
413	1980		still occurs
414	1980s		1993
415	1985		????
416	1985		still occurs
417	DON'T KNOW		????
418	NONE		NONE
419	1990		still occurs
420	1980s		1993/still occurs
421	1984		still occurs
422	1981		still occurs
423	1983		still occurs
424	1980s		still occurs
425	1980s		1993
431	1981		still occurs
426	1988	August 1988	1993/still occurs
427	NONE		NONE
428	NONE		NONE
429	1982		still occurs
430	1981		still occurs
432	BIRTH/1982		still occurs
433	early 1980s		1993
434	early 1980s		1993
435	1980s		1993
436	1980s		1993
437	1988		1993
438	1980s		still occurs
439	mid 1980s		1993/still occurs
441	1980s		still occurs
442	early 1990s		still occurs
443	1989		1993
444	NO INFO		NO INFO
445	1980s	1980s	1991/moved

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Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

446	NO INFO		NO INFO
447	1984		still occurs
448	NONE	1980s	NON
449	NONE		NONE
450	1988		1993
451	late 1980s		1993
452	1989		1993/1996/still
453	1989		1993/94
454	NONE		NONE
455	1980s		No Answer
456	NONE		NONE
457	NONE		NONE
458	NO INFO		NO INFO
459	NO INFO		NO INFO
460	1984		Ochsner
461	late 1970s		still occurs
462	1980s		1993
463	1983		still occurs
465	????		????
466	late 1970s		still occurs
467	NO INFO		NO INFO
468	NO INFO		NO INFO
469	1980s		1993
470	mid 1970s		still occurs
471	NO SWB INFO		NO SWB INFO
472	1980s		1993
473	1980s		1993
474	1980s		1993/death
475	2 DATES		ongoing
476	late 1980s		still occurs
477	1980		still occurs
478	1987		still occurs
479	1980s		still occurs
480	1985		still occurs
481	1980s		still occurs
482	1990		???
483	late 1980s		1994/moved

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Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

484	1985		????
485	early 1980s		1995/moved
486	No Answer		No Answer
487	1981		No Answer
488	1980s		still occurs
489	1970s		still occurs
490			
491	1980s		until death
492			
493	mid 1970s	1975	No Answer
494	NO INFO		NO INFO
495	1989		still occurs
496	early 1980s	1983	early 1990s
497	early 1980s		1993/still occurs
498			
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Table 12. SWB Impact Date, Date of First Symptoms, Last Complaint Date

521			
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531			
532			
533	NO SWB	NO SWB INFO	
534	NO SWB		
535	NO SWB		
536	NO SWB		
537	NO SWB		
538			
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Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
1	Late 70s				1993	UNSURE
2						1970
3	late 1980s		Mui	Le	still occurs	1980s
4	childhood		Gautreaux		still occurs	1985
5	1970s		Area	LoCascio	early 1990s	1970s
6						LATE 70s-1993
7	mid 1980s		Pflug		1992/93	1980s
8	1980		Brown	Bradford	1993	1980s
9	1985		Vocke		1993	1984
10	1988		Webster		1993	DON'T KNOW
11	1990		Occhipinti		1990	1988
12	mid 1980s		Garrett	Monty	still occurs	1986
13	1969		Verrette	Mayfield	still occurs	1980
14	Don't know		Hedgepath	Breaux		DON'T KNOW
15	1980s		Wilson		still occurs	1980
16	mid 1980s		Houser	Tampira	still occurs	1980s
17	1982		Michallius	Schoenburger	still occurs	1980s
18	mid 1980s		Crosby	Leader	still occurs	1980s
19	1980s		Vocke	Tampira	still occurs	1980s
20	1980/1990		Bertucci		still occurs	1980s
21	1979/Hattie St		Ellis	Giorlando	still occurs	late 1970s
22	late 1980s		Tampira	Valesquez	still occurs	1980s
23	late 1970s		Houser	Jackson	1997	late 1970s/1980s
24	1967		Huddleston		still occurs	1980S
25	1980s		Cottles		still occurs	DON'T KNOW
26	1983		LSU Drs	Fontenelle	1993	1994
27	1985	Houser	Huddleston	Houser	1993/still occurs	1980s-1993
28	NONE					1980
29	1990		Lousteau	Taquino	still occurs	NO ANSWER
30	1985		Fri	Lei	No Answer	1985
31	N/A SWB		N/A SWB		N/A SWB	NO ANSWER
32	mid 1980s		Eye Center LA		still occurs	1980s
33	mid 1980s		Tampira	Vocke	??/still occurs	DON'T KNOW
34	NONE		NONE		NONE	NO ANSWER
35	NONE		NONE		NONE	NO ANSWER

Source: Author

Appendix 6.
Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
36						1980s
37	NONE		NONE		NONE	1980s
38	late 1970s		Thomas		still occurs	1966
39	1992		Ellis	Samuels	still occurs	1988
40	1980		Wilson	Caplan	1986/still	1980
41						1970s
42	1975		Valesquez	Claiborne	still occurs	1975
43	1980s		Matheson	Lane	still occurs	1980s
44	early 1970s		Huddleston		early 1990s	1970s/1980s
45	late 1980s	Lifsey	York	Lifsey!!!!!!!!!!!!	1993	1981
46	1991		Dilio	McGee	1997	NO ANSWER
48	1987		Tebbe		1993	1970s
49	1979		Tampira	Scheanburger	still occurs	1980s
50	?????		Mui	Davila	still occurs	late 1979
51	1979		Wise	Rachal	don't know	1980s
52	1987		Verette	Temperia	still occurs	1980s
53	NONE		NONE		NONE	1980s/O-1973/E
54	1984	Ochsner	Ellis	Vocke	still occurs	1980s
55	1980s		Garrett		1993	1980
56	1989		Jones	Naccari	1993/still occurs	NO ANSWER
57						1980s
58	1973		Le	Mui	still occurs	late 1970s/early 1980s
59	early 1990s		Claiborne		still occurs	1980s/O-1970s/E
60	late 1970s		Monte		still occurs	1970s
61	late 1970s		Hebert	Bolton	when dump closed	late 1960s
62	1970s		Contreary	deBoisblanc	still occurs	late 1970s/early 1980s
63	1980		Vocke	Breaux	1992/still occurs	1970s/O-1980s/E
64	1980s		Breaux	Mamons	1992	1987
65	1977		Ellis		still occurs	1980s
66	late 1970s/early 1980s		Rogers		mid 90s/still	1980s
67	1980s		Paiovolet	Temperia	still occurs	1980s
68	early 1980s		Bruni		1993	NO ANSWER
69	1980		Garrett	Vocke	still occurs	late 1970s
70	early 1980s		Lousteau		1993/dump closed	NO ANSWER
71	early 1970s		Pflug	Verette	1993/still occurs	NO ANSWER

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Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
72	1987		Hill		still occurs	1993
73	1980s		Borne	Mason	still occurs	1980s
74						late 1970s
75	1980s		Baez	Stuart	1993	1980s
76	?????		Mui		1995/death	UNSURE
77	1980s		Velazquez		still occurs	1980s
78	1970s		Mayer	Glade	still occurs	1980s
79	1960s		Wolfe	Verrette	still occurs	1980s
80	1987		Bertucci	Bertucci	1993/still occurs	1970s/O-??/E
81	1974		Garrett	Friedlander	N/a	1980s
82	1982		Loupere	Weatherall	1997/death	late 1970s/1980s
83	1990		NONE		1993	1980s
84	1980		Bernard	Brach		1980s
85						NO ANSWER
86	1989		Rabito		1993/still occurs	1989
87	1980s		Mui	Le	still occurs	1984
88	1985		Vocke	StAmant/Sanche	still occurs	1985
89	NO SWB		NONE		NO SWB INFO	1980s
90	1987		Valesquez		1993	1980s
91	????		Phlug		????	late 1970s/1980s-O/1980s-E
92	DON'T KNOW		NONE		still occurs	1980s
93	1980s		York		still occurs	1980s
94	1980s		Baltz		1990 (death)	1980s
95	late 1980s		Beatrice	Kokemor	1991/moved	1980s
96	late 1970s		Claiborne	Bruni	1993	1980s
97	1983		Escafalo		1994/death	1980s
98	late 1970s		Endrinton		1981	1980s
99	1980s		Solomon		1993	1980s
100	1981		Mui		still occurs	1980s
101	1970s		Hill	Mui	still occurs	late 1970s
102	late 1970s		N.O. Occupation		still occurs	1980s
103	1980s		Palermo (D)	Velazquez	1993	late 1970s
104	1980s		Edrington		1993 or N/A ??	1980s
105	1986		Jaramillo		1994	1980s
106						1980s

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Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
107	1985		Kymar	Farrell/Ellis	still occurs	1980s
108	1979		Vocke	Scaeco	still occurs	1980s
109	1989		Balz		still occurs	1980s
110	early 1980s		Acosta	Williams	still occurs	1980s
111	1980s		Bagalman	Maumus	1993/still occurs	late 1970s/early 1980s
112	1980s		Bodes		1993	1980s
113	None		NONE		N/A	1980s
114	late 1970s		Velazquez		still occurs	late 1970s
115	early 1980s		Monte		1993/death	1980s
116	late 1970s		Evers	Mayers	1993/still occurs	1980s
117	1987		Higgins		1993	1980s
118	NO INFO		NO INFO		NO INFO	1980s
119	???		Vocke	Maumus	still occurs	1980s
120	1980s		Ellis	Gendler	1993	1980s
121	No Answer		Breaux		????	late 1970s
122	1990		Acosta	Claiborne	still occurs	1980s
123	1989		Fontenelle	Vocke	still occurs	1980
124	CHILDHOOD		Phlug	Contreary	still occurs	1980s
125	mid 1980s		Ellis	Vocke	still occurs	1980s
126	CHILD/1980s		NONE		still occurs	1980s
127	NO INFO	NO INFO			NO INFO	1980s
128	mid 1980s		Ramirez	Moreau	still occurs	mid 1980s
129	1988		Verrett	Pflug (D)	1993	1988
130	late 1970s		Hoffman	Braley	1994	late 1970s
131	mid 1980s		Fontenelle		early 1990s	mid 1980s
132	1980		Kiosky		1993	1980s
133	mid 1980s		St. Amant	Rabito	1991	1980s
134	1970s		Bradley	Domain	1995/Texas	1970s
135	early 1980s		Jacobs	Ellis	still occurs	early 1980s
136	?????		Wise		No Answer	1980s
137	1985		Vocke	Lee	still occurs	1973
138	NONE		VA doctors		n/a	1970/early 1980s
139	1989		Leery	Phente	No Answer	Don't know
140	1980s		Mui	Berger	still occurs	mid 1980s
141	NONE		NONE		NONE	Don't know

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Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
142	early 1980s		Crosby	Vocke	still occurs	late 1970s/1980s
143	1987		Bertucci		1994	late 1980s
144	1980s		Cruz		1993	1970s; Worse 1980s
145	1980s		Cabiran		1993	1980
146						1970s
147	1980s		Bertucci		still occurs	mid 1980s
148	1987		Bourgeois (D)	Vocke	still occurs	late 1970s/1980s
149	1988		Parker		1993/still	late 1980s
150	1980s		Magee	Garrett	still occurs	late 1970s/1980s
151	late 1970s		Houser		still occurs	1980s
152	early 1980s		Ellis	Vocke		1980s
153	late 1970s		Uribe	Stock	death	late 1970s/1980s
154	late 1970s		Cook		still occurs	late 1970s
155	1970s		Huddleston		1990s	late 1970s/1980s
157	1989		Boyd		no answer	1987
158	early 1980s		Verette	Valesquez	still occurs	1980
159	1981	Vocke	Vocke	Cabiras	still occurs	late 1970s
160	late 1970s		Verrette	Contreary	still occurs	late 1980s
161	1985		Monte	Lousteau	1993	late 1970s/1980s
162	1980s		Vocke		still occurs	late 1970s
163	1970s		Mottram		1996/death	1980s
164	1978		NONE		still occurs	1978-1980S
165	1989		Bhansali	Baltz	1993/still occurs	1980s
166	1989		Baltz			1980s
167	late 1970s		Garrett		still occurs	1980s
168	1982		Matthewson	Levy	still occurs	early 1990s
169	late 1980s		Garcia		still occurs	late 1970s
170	late 1980s		????		1994/death	1985
171	1964		Koretsky	Naccari	1996	1970
172	1989		Scalco		1993	1989
173	1980s		Huddleston		1994	1980s
174	1980s		Verrette		still occurs	mid 1970s/1980s
175	1990		Incaprera		1995	1980s
176	1980s		Cole		1993	1980s
177	NONE		NONE		N/A	late 1970s

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
178	1984		Velasquez	Weaver	still occurs	1970s
179	mid 1980s		Morgan	deBoisblanc	still occurs	1980s
180	1989		Vocke		1993	late 1970s
181	mid 1970s		Baltz		still occurs	mid 1970s
182	mid 1980d		Andrews		1992/rarely now	1980s
183	1980		Vocke	Garrett	N/A	late 1970s
184	1980s		Vocke		1993/still occurs	1980
185	1985		Bertucci		still occurs	1980s
186	late 1970s		Mui	Glade	1990/still occurs	LATE 1970s
187	late 1970s	Iteld	Vocke	Iteld	still occurs	mid 1970s
188	mid 1980s		None		1992/moved	late 1980s
189	1980s		Verrette		still occurs	1980S
190	mid 1980s		Persich	Murra	still occurs	mid 1980s
191	1980s		Mui	Rabito	????	1980S
192	1980s	Ellis	Ellis		1993	1980S
193	no info					NO INFORMATION
194	early 1980s		LoCascio	Lousteau	1994/1997	1980S
195	1980s		Mayfield		still occurs	1984
196	1980s		Verrette	Cabiran	still occurs	1980s
197	1969		Smith	Trestman	1992/death	mid 1970s
198	1988		Acosta	Brammer	still occurs	1980s
199	1978		Vocke		still occurs	mid 1980s
200	NONE		NONE		N/A	1980
201	don't know		Verrette	Mangotte	still occurs	1980S
202	NO INFO		Iteld	Bernstein	no info	LATE 1970S
203	1980s		Mayfield	Bertucci	still occurs	1980S
204	1980s		Le	Mui	1993	1980S
205	1980s		Labourdette	Bodeman (AK)	1994/still occurs	1980S
206	NONE				N/A	1980S
207	mid 1970s		Hayes	Ferguson	1993/5	mid 1970s
208	late 1970s		Verrette		No Answer	late 1980s
209	early 1980s		Garrett		1990/moved	1980s
210	late 1970s					
211	1987		Cruz		1993	1980s
212	childhood		Hill		still occurs	???? (Can't recall odors)

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
213	mid 1980s		Verrette	Larimer	1989/still occurs	1986
214	1979		Fattell		1993	1970s
215	1980s		NONE	NONE	N/A	1980s
216	1970s		Bole		1997/death	1980s
217	1980s		Daly		1993	1980s
218	NO INFO		Verrette	Bruni	NO INFO	early 1980s
219						1980s
220	1978		Touchi		still occurs	1980s
221	1990		Mui		No Answer	MID 1980s
222	1984/1993	Schoenberger	Schoenberger		still occurs	MID 1980s
223	NO INFO		NO INFO		NO INFO	LATE 1970S/1980s
224	late 1970s		Verrette	Ellis	still occurs	MID 1970s/1980s
225	1969		Lousteau	Hagmann	still occurs	late 1970s/early 1980s
226	NONE		NONE		NONE	1980s
227	1980		Salvaggio	Lopez	still occurs	1980s
228	1985		Huddleston	Paddock	1993	mid 1980s
229	late 1980s		Tampira		still occurs	late 1980s
230	1987		St. Amant		1995/moved	1987
231	1987		NONE		1989	1987
232						1980s
233	late 1980s		Company Dr.		still occurs	1989
234	late 1970s		Terezakis		still occurs	MID 1980s
235	1980s		Verrette	Manghat	death	1980s
236	NONE		Dr. info imp	Will contract		1980s
237	1978		Fontenelle		1993/still occurs	1980s
238	late 1980s		None		still occurs	1980s
239	NO INFO		NO INFO			late 1970s
240	1991		Bruni		still occurs	1980s
241	1987		Keirshaw	Fontenelle	still occurs	early 1980s
242	late 1970s		Mager	Pont. Health	still occurs	1980
243	NONE		NONE		NONE	1981
245	1980s		Tampira		still occurs	early 1970s
246	NO INFO		Velazquez	Vogt	????	1980s
247	NO INFO		NO INFO		NO INFO	1980s
248	late 1960s		Magee	Andrews	still occurs	1980

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
249	mid 1980s					1980s
250	1981		Tulane Hosp	Charity Hosp	still occurs	1980s
251	mid 1980s		Huddleston	Verrette	still occurs	early 1980s
252	mid 1980s					mid 1980s
253	1980s		NONE		still occurs	mid 1980s
254	Late 1970s		Labordette		1993/still occur	
255	NO INFO		NO INFO		NO INFO	
256	mid 1980s		Verette	Tampira	1996 (D)	1980s
257	NONE					
258	1980s		NONE		still occurs	mid 1980s
259	1980		VILLA (D)		1993/still	mid 1980s
260	1980s		LOUSTEAU	ELLIS	early 90s/still	late 1980s
261	NO INFO		NO INFO		NO INFO	
262	late 1960s		Pou	Bonsali	1994 (D)	late 1970s/early 1980s
263	NONE		SEGURA			NO INFO
264	NONE					NO INFO
265	NONE					NO INFO
266	NONE					NO INFO
267	1984		MAGEE	BRANDON	UNTIL DEATH	Late 1970s-1980s
268	mid 1980s		Ellis		still occurs	1984
269	1984		Jeansonne		still occurs	1984
270	NO INFO					
271	1973		Le	Mui	still occurs	
272	1983		Mayfield	Mui	still occurs	
273	1985		Le			
274	mid 1980s		Huddleston	Nobles	don't know	
275	early 1980s		Vocke		still occurs	
276	don't know		Verrette		still occurs	
277	1980		NONE		still occurs	
278	1988		Volke	Lupo	still occurs	
279	late 1970s		Richards	McNulty	still occurs	
280	NO ANSWER		NONE		N/A	1980s
281	No Answer		Edrington	Cruz	1991/death	1980s
282	1970S		Coehn	Ellis	still occurs	
283	1970s		NONE		still occurs	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
284	late 1970s		Persich	Bruni	1994/death	
285	NONE		NONE		N/A	
286	1989		Monte	Vocke	1995/death	
287	1980		Loupere		still occurs	
288	late 1970s		Verrette		still occurs	
289	NO INFO		NO INFO		NO INFO	
290	1989		Baltz		1993	
291	late 1970s		Houser		still occurs	
292	1987		Davilla	Wolfe	still occurs	
293	NO SWB		NO SWB		NO SWB	
294	1980s		Le	Mui	1993	
295	NONE		NONE		NONE	1982
296	mid 1980s		Bruni	Doming	1993	
297	1986		Mayfield		1993	
298	1986		Mayfield		1993/still occurs	
299	1986		Mayfield		1993	
300	1987		Mayfield			
301	late 1970s		NONE		1994/moved	
302	N/A		NONE		N/A	
304	1988		Balz	Garrett	still occurs	
305	1984		NONE		1994	
306	1991		Contreary	Velasquez	still occurs	
307	1985		Caplan		early 1990s	
308	late 1970s		Bovin	Leonard	1993	
309	1980s		Yayigi	Garrett	still occurs	
310	early 1980s		Farber	Mayer	still occurs	
311	1980s		Farber	Cenac	still occurs	
312	1987		Cruz		1993	
313	1980s		Bruni, Valesquez			
314	childhood		Tebbe	Smith	still occurs	
315	late 1970s		Vocke	Acosta	still occurs	
316	1980		Montegado	Kron	still occurs	1980s
317	childhood		Contreary	Brousse	still occurs	
318	1985		Mui	Lousteau	still occurs	
319	1980s		Velazquez		still occurs	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
320	1982		Acosta		still occurs	
321	1986		DiLeo		still occurs	
322	1980s		Vocke		still occurs	
323	1983		Bruni	Brunner	still occurs	
324	NONE		NONE		NONE	
325	late 1970s		Fouchi		still occurs	
326	1985		Leery		1993	
327	None		Mui		N/A	
328	????		Mui	St. Amant	still occurs	
329	1982		Laramoor		still occurs	
330	????		N/A		still occurs	
331	mid 1980s		Huddleston		still occurs	1980s
332	NO INFO		NO INFO		NO INFO	
333	1987		St. Amant		1995/moved	
334	1987		St. Amant		1998/death	
335	early 1980s		Matheson		still occurs	
336	1987		Lake	Giorlando	1993/written in later	
337	1984		Iteld		1995/moved	mid 1980s
338	1984		Fontanelle		1995/moved	
339	1989		Navy Drs.		1993/lessened	
340	1989		Navy Drs.		1993/lessened	
341	1989		Navy Drs.		still occurs	
342	1989		Navy Drs.		still occurs	
343	late 1980s		No Answer		still occurs	NO INFO
344	1978		Le	Mui	still occurs	
345	1978		Chin	Le	still occurs	
346	1982/BIRTH		Chin	Le	still occurs	
347	late 1970s		deBoisblanc	Wolf	1994	
348	1989		Verrette		1995/death	
349	mid 1980s		Jeanfreau		early 1990s	
350	1976		Lousteau		1996/still occurs	
351	1980s		Bertucci	Hill	still occurs	
352	1985		Lifsey		1993	
353	1985		York		1993	
354	1989/birth		York	Lifsey	1993	

Appendix 6.
Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
355	1980s		Ellis	Johnson	1993	
356	1985		NONE		1993	
357	late 1970s		NONE		1993/still occurs	
358			Brian Naccari	Vocke		
359	1984		Calcleugh	Hebert	1993	
360	NO INFO		Calcleugh	Klein	NO INFO	
361	NO INFO		NO INFO	NO INFO	NO INFO	
362	1980s		Bradley		1993/still occurs	
363	1980s		Evers	Mayers	still occurs	
364	1987		Valesquez		1993	
365	????		???		????	
366	mid 1980s		Ellis	Jacobs	1993/still occurs	
367	1988		Giorlando		1993/still occurs	
368	mid 1980s		Myers	Casgriff	1997/still occurs	
369	1988		No Answer		still occurs	
370	mid 1980s		Persich		1995	
371	1987		Higgins		still occurs	
372	1980		Roberts	Schaffer	still occurs	
373	1980		Roberts	Schaffer	still occurs	
374	BIRTH		Parker		still occurs	
375	1980		Schaffer		still occurs	
376	NO INFO		NO INFO		NO INFO	
377	1981		Occhipinti	Chin	still occurs	
378	early 1980s		Garrett		DON'T KNOW/ODO	
379	late 1980s		NONE		1993	
380	NONE		NONE		NONE	
381	???		N/A		still occurs	
382	1980s		Klein		1993/still occurs	
383	late 1970s		Schurden	Treadway	???	
384	1987		Davila		still occurs	
385	early 1980s		Bruni		still occurs	
386	1980s		Giorlando		still occurs	
387	NONE		NONE		NONE	
388	1968/1987		Vockie	Garrett	still occurs	
389	1987		Ellis	Garrett	still occurs	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
390	NO INFO		NO INFO		NO INFO	
391	mid 1980s		Le	Mui	still occurs	
392	mid 1980s		Garrett	Monty	still occurs	
393	1988		York	Garrett	still occurs	
394	1980		Wise		still occurs	
395	NONE		NONE		NONE	
396	mid 1980s		Giorlando	Giorlando	still occurs	
397	NONE		NONE		NONE	
398	1984		Samuels	Bruni	still occurs	
399	DON'T KNOW		Cabarian	Fontenelle	still occurs	
400	1984		NONE		1993	
401	1989		Contreary		still occurs	
402	NO INFO		NO INFO		NO INFO	
403	1970s		Fleming		still occurs	
404	1988		Breaux		still occurs	late 1970s/mid 1980s
405	1980s		Vocke	Bohn	still occurs	
406	1978		Vocke	Burnstein	still occurs	
407	1974		Ellis		still occurs	
408	late 1970s		Giorlando		still occurs	
409	early 1980s		Giorlando		still occurs	
410	1990		Fontenelle		don't know	
411	1991		NONE		still occurs	
412	NO SWB		NO SWB		NO SWB	
413	1980		Ellis	Vocke	still occurs	
414	1980s		Occhipinti		1993	
415	1985		Mui		????	
416	1985		Jeansonne		still occurs	
417	DON'T KNOW		Jeansonne		????	
418	NONE		Jeansonne		NONE	
419	1990		Jeansonne		still occurs	
420	1980s		Le	Mui	1993/still occurs	
421	1984		Carlomagno		still occurs	
422	1981		LeBoeuf	Mui	still occurs	
423	1983		LeBoeuf	Mui	still occurs	
424	1980s		Mamus		still occurs	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
425	1980s		Bertucci		1993	
426	1988		Occhipinti	Rabito	1993/still occurs	August 1988
427	NONE		NONE		NONE	
428	NONE		NONE		NONE	
429	1982		Levy	Cole	still occurs	
430	1981		Buras	LeBoeuf	still occurs	
431	1981		LeBoeuf	Kluka	still occurs	
432	BIRTH/1982		Klees	Buras	still occurs	
433	early 1980s		Lousteau		1993	
434	early 1980s		Chin		1993	
435	1980s		Chin		1993	
436	1980s		Chin		1993	
437	1988		Chin		1993	
438	1980s		Maumus	Mattram	still occurs	
439	mid 1980s		Vocke	Bruni	1993/still occurs	
440	1988		Bertucci	Bertucci	1993/still occurs	
441	1980s		Boyd	Miles	still occurs	
442	early 1990s		Claiborne		still occurs	
443	1989		Vogt	Edrington	1993	
444	NO INFO		NO INFO		NO INFO	
445	1980s		Ellis	Vocke	1991/moved	1980s
446	NO INFO		NO INFO		NO INFO	
447	1984		Capone	Ellis	still occurs	
448	NONE		NONE		NONE	1980s
449	NONE		NONE		NONE	
450	1988		Verrett	Valesquez	1993	
451	late 1980s		Boudreaux	Saber	1993	
452	1989		James	Scalco	1993/1996/still	
453	1989		Capone	Scalco	1993/94	
454	NONE		Hoffmann		NONE	
455	1980s		Mui		No Answer	
456	NONE		Mui		NONE	
457	NONE		NONE		NONE	
458	NO INFO		NO INFO		NO INFO	
459	NO INFO		NO INFO		NO INFO	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
460	1984		Vocke	Ellis	Ochsner	
461	late 1970s		Magee	Andrews	still occurs	
462	1980s		Bertucci	Thian	1993	
463	1983		Lousteau	Claiborne	still occurs	
464	1988		Vocke	Ellis	1993/subsided	
465	????		Tontiplaphol		????	
466	late 1970s		Cook		still occurs	
467	NO INFO		NO INFO		NO INFO	
468	NO INFO		NO INFO		NO INFO	
469	1980s		Cabiran		1993	
470	mid 1970s		Ellis		still occurs	
471	NO SWB INFO		NO SWB INFO		NO SWB INFO	
472	1980s		Cruz		1993	
473	1980s		Cruz	Landrieu	1993	
474	1980s		Cole	Cari	1993/death	
475	2 DATES		Ellis		ongoing	
476	late 1980s		Garrett	Mui	still occurs	
477	1980		Fouchi		still occurs	
478	1987		Cook		still occurs	
479	1980s		Jeanfreau		still occurs	
480	1985		Hardges		still occurs	
481	1980s		Haindel		still occurs	
482	1990		Roberie	Rareshide	???	
483	late 1980s		Jacob	Gurtler	1994/moved	
484	1985		Gauthreaux	Mooney	????	
485	early 1980s		Verrette	Dageny	1995/moved	
486	No Answer		Thomas	Finnan	No Answer	
487	1981		Giorlando		No Answer	
488	1980s		Hill	St. Amant	still occurs	
489	1970s		Watson	Stein	still occurs	
490						
491	1980s		Mui	Weilbaecher	until death	
492						
493	mid 1970s		Pflug		No Answer	1975
494	NO INFO		NO INFO		NO INFO	

Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
495	1989		Wolfe	Samuels	still occurs	
496	early 1980s		Ellis		early 1990s	1983
497	early 1980s		Johnson	Vocke	1993/still occurs	
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Appendix 6.

Table 13. Doctors Attributing Symptoms to SWB & Other Treating Physicians

ID	SYMPTOMS	Dr Cause	Doctor 1	Doctor 2	Last Complaint Date	SWB IMPACT DATE
530						
531						
532						
533	NO SWB					NO SWB INFO
534	NO SWB					
535	NO SWB					
536	NO SWB					
537	NO SWB					
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Appendix 7.

Table 14. Property Values & Desire to Sell

ID	Devalued	SELL	Flood	Residency	Number	Street	Flood Repairs	Felony	Lawsuit
1	YES	No	Yes	1971	1928	Benjamin	Don't Know	DWI	FALSE
2		SOLD			439	Parlange		NO	FALSE
3	YES	NO/MB	Yes	1974	2213	Benjamin	SELF	NO	FALSE
4	YES	SOLD	No Ans	1985	120	Puma	N/A	NO	TRUE
5	YES	No	Yes	1969	1400	Perrin	UNKNOWN	NO	FALSE
6		YES			2209	Benjamin		NO	TRUE
7	YES	SOLD	Yes	1963	1816	Karl	Don't know	NO	FALSE
8	YES	SOLD	Yes		7541	Patricia	SELF	NO	FALSE
9	YES	No	NO	1984	401	Norton	N/A	NO	TRUE
10	YES	No	Yes	1956	7203	Patricia	SELF	NO	FALSE
11	YES	No	NO	1978	1921	Rose	N/A	NO	TRUE
12	YES	No	No	1989	7162	Patricia	NONE	NO	FALSE
13	YES	No	Yes	1962	817	Cougar	Friends/family	NO	FALSE
14	NO ANSWER	No	Yes	1954	1910	Rose	Family	NO	FALSE
15	YES	No	Yes	1958	1820	Rose	SELF	NO	FALSE
16	YES	No	Yes	1956	1710	Schnell	SELF	NO	TRUE
17	RENT	RENT	NO	1982	641	Friscoville	NONE	NO	FALSE
18	YES	No	Yes	1958	1920	Rose	Friends/family	NO	TRUE
19	YES	No	Yes	1952	7202	Patricia	Friends/family	NO	TRUE
20	YES	No	No	1967	1922	Center	N/A	NO	FALSE
21	YES	YES	No	1987	916	Perrin	N/A	NO	TRUE
22	YES	No	Yes	1952	1706	Alexander	SELF	NO	FALSE
23	YES	No	Yes	1961	2320	Benjamin	SELF	NO	FALSE
24	YES	No	Yes	1984	2300	Aycock	No Answer	NO	FALSE
25	NO ANSWER	RENT	NF	1988	605	Esteban		NO	TRUE
26	YES	No	Yes	1959	324	Bear	SELF	NO	FALSE
27	YES	YES	No	1984	1114	Friscoville	N/A	NO	FALSE
28	RENT	RENT	No	1986	1916	ROSE		NO	FALSE
29	YES	No	NF	1981	400	Ocelot	N/A	NO	FALSE
30	YES	RENT	N/A	1985	3501	Sinclair	N/A	NO	TRUE
31	YES	No	NO	1987	1907	Rose	N/A	NO	FALSE
32	YES	SOLD	NF	1979	410	Center	N/A	NO	TRUE
33	YES	RENT	NF	1986	7206	Anne		NO	TRUE
34	YES	No	Yes	1962	2117	Benjamin	SELF	NO	FALSE
35	YES	No	Yes	1972	1915	Alexander	No Answer	NO	FALSE
36		No			1820	Schnell		NO	FALSE
37	YES	NO!!	No	1959	545	Esteban	N/A	NO	TRUE
38	YES	No	Yes	1962	1823	Rose	Tri-Parish	NO	FALSE
39	YES	SOLD	???	1988	2133	Benjamin	None	NO	FALSE

Source: Author

Appendix 7.

Table 14. Property Values & Desire to Sell

40	NO	RENT	NO	1979	2124	Aycock	N/A	NO	FALSE
41		No			1930	Karl		NO	FALSE
42	YES	YES	NO	1975	2002	Benjamin	N/A	NO	FALSE
43	YES	No	Yes	1970	224	Nutria	No Answer	NO	FALSE
44	YES	No	Yes	1962	2317	Benjamin	SELF	NO	FALSE
45	YES	No	No	1981	1906	Karl	N/A	NO	FALSE
46	YES	No	No	1974	2216	Esteban	N/A	NO	FALSE
47		No			2414	Dubriel		NO	FALSE
48	YES	YES	Yes	1977	2321	Aycock	No Answer	NO	FALSE
49	YES	No	NF	1968	7205	Sidney		NO	FALSE
50	YES	No	Yes	1979	1911	Benjamin	No Answer	NO	FALSE
51	YES	No	Yes	1979	1912	Karl	Don't know	NO	FALSE
52	YES	YES	Yes	1959	1004	Perrin	SELF	NO	TRUE
53	YES	No	Yes	1962	228	Beaver	FAMILY	NO	TRUE
54	YES	RENT	No	1985	2129	Angella	N/A	NO	TRUE
55	YES	No	Yes	1952	1806	Alexander	No Answer	NO	FALSE
56	YES	No	NF	1989	1429	Perrin	N/A	NO	FALSE
57		No			1817	Benjamin		NO	TRUE
58	YES	No	No	1970	540	Esteban		NO	TRUE
59	YES	No	No	1970	1905	Aycock	N/A	NO	FALSE
60	YES	No	Yes	1953	1826	Rose	SELF	NO	FALSE
61	YES	No	Yes	1963	2301	Benjamin	Paul Molinary	NO	FALSE
62	YES	No	Yes	1960	7202	Sidney	Walley/Vaughan	NO	FALSE
63	YES	SOLD	Yes	1978	224	Coney Drive	replaced carpets	NO	FALSE
64	RENT	BOARDER	N/A	1962	2201	Benjamin	N/A	NO	TRUE
65	YES	No	NO	1977	6900	Patricia	N/A	NO	FALSE
66	YES	No	Yes	1960	2129	Angela	SELF	NO	FALSE
67	YES	No	Yes	1956	1811	Alexander	SELF	NO	FALSE
68	YES	No	N/A	1973	1949	Benjamin	N/A	NO	TRUE
69	YES	No	Yes	1974	2229	Aycock	Don't know	NO	FALSE
70	YES	No	No	1978	1914	Rose	N/A	NO	FALSE
71	YES	No	Yes	1962	7201	Sidney	SELF	NO	FALSE
72	YES	No	No	1975	1901	Aycock	N/A	NO	FALSE
73	YES	No	Yes	1962	1900	Esteban	SELF	NO	FALSE
74	YES	No	Yes	1955	2217	Mehle	SELF	NO	FALSE
75	YES	No	No	1982	2218	Mehle	N/A	NO	FALSE
76	YES	No	Yes	1962	6600	N. Pricue	SELF	NO	FALSE
77	YES	No	Yes	1961	2312	Benjamin	SELF	NO	FALSE
78	YES	No	Yes	1961	2309	Benjamin	Christ Westcott (D)	NO	TRUE
79	YES	No	Yes	1960	2035	Benjamin	SELF	NO	FALSE

Appendix 7.

Table 14. Property Values & Desire to Sell

80	YES	No	Yes	1960	2023	Benjamin	SELF	NO	FALSE
81	YES	No	Yes	1959	1625	Aycock	Can't remember	NO	FALSE
82	YES	No	Yes	1956	1914	Alexander	SELF	NO	FALSE
83	YES	YES	Yes	1954	1916	Alexander	SELF	NO	FALSE
84	YES	YES	Yes		2309	Mehle	No Answer	NO	FALSE
85	YES	UNSURE	NO	1977	2122	Mehle	NONE	NO	FALSE
86	YES	No	NO	1989	1909	Karl	N/A	NO	FALSE
87	YES	No	No ans	1992	-1930	Rose		NO	FALSE
88	YES	DON'T KNOW	NF	1981	1934	Rose		NO	FALSE
89	YES	No	No	1973	1725	Center	N/A	NO	TRUE
90	YES	No	Yes	1954	2013	Center	E.B.Chatelain	NO	FALSE
91	YES	No	Yes	1951	7912	Anne	SELF	NO	TRUE
92	YES	No	No	1976	7227	Anne	None	YES	TRUE
93	RENT	RENT	N/A	1969	7222	Anne	No Answers	NO	FALSE
94	YES	No	Yes	1951	1604	Center	No Answer	NO	TRUE
95	YES	No	Yes	1973	1316	Perrin	Before ownership	NO	FALSE
96	YES	No	Yes	1959	7212	Patricia	SELF	NO	FALSE
97	YES	No	Yes	1959	125	Cougar	SELF	NO	FALSE
98	YES	SOLD	Yes	1965	7645	Patricia	Richard Callon	NO	FALSE
99	YES	No	No	1977	7217	Anne	NONE	NO	FALSE
100	YES	YES	No	1976	1909	Rose	N/A	NO	FALSE
101	YES	No	No	1967	1905	Karl	N/A	YES	TRUE
102	YES	No	No	1957	1832	Rose	N/A ???Betsy	NO	TRUE
103	YES	No	Yes	1958	924	Perrin	Magnolia State	NO	FALSE
104	YES	No	Yes	1961	1320	Perrin	No answer	NO	FALSE
105	NO ANSWER	No	Yes	1953	1827	Rose	SELF	NO	FALSE
106	YES	YES	Yes	1963	2103	Center	CAN'T REMEMBER	NO	TRUE
107	YES	YES	Yes	1982	7203	Sidney	SELF	NO	FALSE
108	YES	No	Yes	1979	2225	Aycock	SELF	NO	TRUE
109	YES	No ans	Yes	1967	2325	Aycock	SELF	NO	FALSE
110	YES	No	NF	1969	1807	Rose	N/A	NO	FALSE
111	YES	No	Yes	1960	1317	Rose	SELF	NO	FALSE
112	YES	No	Yes	1954	405	Livingston	SELF	NO	FALSE
113	YES	No	Yes	1961	204	Coney	SELF	NO	TRUE
114	YES	No	No	1962	212	Mink	N/A	NO	FALSE
115		No			220	Nutria		NO	TRUE
116	YES	No	Yes	1960	217	Nutria	SELF	NO	FALSE
117	YES	YES	Yes	1951	613	Cougar	DON'T KNOW	NO	FALSE
118	YES	No	Yes	1963	208	Genet	SELF	NO	FALSE
119	YES	No	Yes	1967	1944	Rose	DON'T KNOW	NO	FALSE

Appendix 7.

Table 14. Property Values & Desire to Sell

120	YES	No	No	1987	7612	Patricia	N/A	NO	FALSE
121	YES	No	Yes	1960	2101	Benjamin	SELF	NO	FALSE
122	YES	No	No	1954	1964	Benjamin	Not since owned	NO	FALSE
123	YES	No	Yes	1959	416	Bear	SELF	NO	FALSE
124	YES	No	NO	1984	204	Ocelot	NONE	NO	TRUE
125	YES	No	No	1976	1814	Schnell	NONE	NO	FALSE
126	NO	No	No	1985	1827	Rose	N/A	NO	FALSE
127	YES	YES	Yes	1953	1706	Alexander	Friends	NO	FALSE
128	YES	No	Yes	1952	7222	Anne	SELF	NO	FALSE
129	YES	NOT SURE	Yes	1964	120	Mink	SELF	NO	FALSE
130	YES	No	Yes	1955	321	Parish	No Answer	YES	TRUE
131	RENT	RENT	NO	1955	321	Parish	N/A	NO	TRUE
132	YES	No	Yes	1960	1831	Rose	SELF	NO	TRUE
133	YES	SOLD	Yes	1954	1900	Center	DON'T KNOW	NO	FALSE
134	YES	No	Yes	1956	540	Perrin	DON'T KNOW		FALSE
135	YES	No	No	1982	548	Esteban	N/A	NO	FALSE
136	YES	No	Yes	1950	1400	Alexander	No Answer	NO	FALSE
137	YES	No	No	1955	605	Esteban	Unknown	NO	FALSE
138	YES	No	Yes	1954	1927	Benjamin	SELF	NO	FALSE
139	YES	No	No	1976	7208	Prosperity	None as owner	NO	FALSE
140	YES	No	No	1974	320	320 Liama	N/A	NO	FALSE
141	YES	No	Yes	1954	1923	Center	SELF	NO	FALSE
142	YES	No	Yes	1954	1945	Benjamin	SELF	NO	FALSE
143	YES	No	No	1985	1930	Benjamin	N/A	NO	FALSE
144	YES	No	Yes	1960	1529	Schnell	No Answer	NO	FALSE
145	YES	No	Yes	1957	1605	Mehle	N/A	NO	FALSE
146		No			2213	Mehle		NO	FALSE
147	YES	No	Yes	1965	108	Jaguar	SELF	NO	TRUE
148	YES	No	Yes	1959	1946	Benjamin	Barnes (Tenn.)	NO	FALSE
149	YES	SOLD	Yes	1960	2113	Benjamin	No Answer	NO	FALSE
150	YES	No	Yes	1960	7517	Patricia	Self	NO	FALSE
151	YES	No ans	???	1975	2302	Mehle	N/A	NO	FALSE
152	YES	No	NF	1982	2124	Aycock	N/A	NO	FALSE
153	YES	No	Yes	1951	2316	Esteban	Themselves	NO	FALSE
154	YES	No	No	1967	7218	Anne	NONE	NO	FALSE
155	YES	No	Yes	1960	7508	Patricia	SELF	NO	FALSE
156	YES	LEASE/OV	Yes	1987	2125	Benjamin	FRIENDS	NO	FALSE
157	NO	RENT	N/A	1989	1821	Esteban	N/A	NO	FALSE
158	YES	No	Yes	1952	1951	Benjamin	Bill Murrette	NO	FALSE
159	YES	No	Yes	1955	1728	Esteban	S&S Construction	NO	FALSE

Appendix 7.

Table 14. Property Values & Desire to Sell

160	YES	No	No	1980	1931	Rose	N/A	NO	TRUE
161	YES	No	No	1968	7205	Sally	N/A	NO	TRUE
162	YES	No	Yes	1962	2324	Benjamin	SELF	NO	FALSE
163	YES	No	Yes	1957	2004	Benjamin	No Answer	NO	FALSE
164	YES	No	N/A	1978	1912	Rose	N/A	NO	FALSE
165	YES	No	No	1966	401	Chinchilla	N/A	YES	TRUE
166		No			321	Chinchilla		NO	FALSE
167	YES	SOLD	No	1979	103	Puma	N/A	NO	FALSE
168	YES	SOLD	No	1982	1713	Aycock	N/A	NO	FALSE
169	YES	No	Yes	1954	1702	Alexander	Don't know	NO	FALSE
170	YES	SOLD	No	1985	1032	Cougar	N/A	NO	TRUE
171	YES	SOLD	Yes	1964	1201	Perrin	SELF	NO	FALSE
172	YES	SOLD	No	1988	1912	Benjamin	Garage dried out	NO	FALSE
173	YES	No	Yes	1954	1932	Rose	SELF	NO	FALSE
174	YES	No	Yes	1962	1827	Karl	SELF	NO	TRUE
175	YES	No	Yes	1951	7206	Easy	No Answer		FALSE
176	YES	No	Yes	1950	1700	Center	SELF	NO	FALSE
177	YES	No	No	1971	1440	Perrin	N/A	NO	FALSE
178	YES	No ans	Yes	1965	1132	Perrin	SELF	NO	TRUE
179	YES	No	No	1980	1628	Esteban	N/A	NO	FALSE
180	YES	No	Yes	1960	2301	Mehle	No Answer	NO	FALSE
181	YES	No	N/A	1964	1929	Rose	N/A	NO	FALSE
182	YES	SOLD	Yes	1962	204	Nutria	SELF/CO-WORKER	NO	TRUE
183	DID NOT OWN	LIVE W/PA	Yes	1960	3105	Packenham	No Answer	YES	TRUE
184	YES	SOLD	Yes	1964	304	Fawn	No Answer	NO	TRUE
185	NO	SOLD	No	1987	1905	Alexander	N/A	NO	FALSE
186	YES	No	Yes	1961	141	Jaguar	SELF	NO	TRUE
187	YES	No	Yes	1963	1912	Alexander	SELF	NO	FALSE
188	RENT	RENT	No	1984	316	Lynx	No Answer	NO	TRUE
189	YES	No	Yes	1967	317	Llama	No Answer	NO	FALSE
190	YES	No	No	1977	7213	W. Judge Pere	N/A	NO	FALSE
191	YES	No	Yes	1965	120	Jaguar	No Answer	NO	FALSE
192	YES	No	Yes	1952	1415	Center	No Answer	NO	FALSE
193		N/A						NO	FALSE
195	YES	SOLD	NF	1978	615	Friscoville		NO	FALSE
196	YES	SOLD	NF	1918	7201	Friscoville		NO	FALSE
197	YES	SOLD	Yes	1959	209	Genet	No Answer	NO	FALSE
198	YES	No	Yes	1963	2133	Benjamin	DON'T KNOW	NO	TRUE
199	YES	No	Yes	1964	205	Coney	No Answer	NO	TRUE
200	YES	SOLD	YES	1954	1931	Benjamin	SELF	NO	TRUE

Appendix 7.

Table 14. Property Values & Desire to Sell

201	YES	N/A	Yes	1954	1925	Rose	Landry	NO	FALSE
202	YES	No	Yes	1974	404	Ocelot	Themselves	NO	TRUE
203	YES	N/A	No	1967	1963	Benjamin	N/A	NO	TRUE
204	YES	No	Yes	1963	2321	Benjamin	No Answer	NO	FALSE
205	YES	SOLD	Yes	1962	1448	Perrin	SELF	NO	FALSE
206	N/A	NO	Yes	1951	1508	Alexander	SELF	NO	FALSE
207	YES	No	Yes	1954	1918	Center	No Answer	NO	TRUE
208	YES	No	No	1977	1922	Alexander	Not as owner	NO	FALSE
209	YES	SOLD	No	1979	413	Chinchilla	N/A	NO	FALSE
211	YES	No	Yes	1960	209	Nutria	No Answer	NO	FALSE
212	YES	No	Yes	1963	1823	Angela	No Answer	NO	FALSE
213	N/A	No	Yes	1962	2027	Benjamin	SELF	NO	FALSE
194	YES	No	No	1975	1970	Benjamin	N/A	NO	FALSE
214	YES	No	No ans	1986	701	Cougar	None	NO	FALSE
215	YES	No	Yes	1964	1608	Alexander	SELF	NO	FALSE
216	YES	No	Yes	1955	2316	Aycock	No Answer	NO	TRUE
217	YES	YES	No	1980	1966	Benjamin	NONE	NO	FALSE
218	DON'T KNOW	NO	Yes		1919	Benjamin	No Answer	NO	FALSE
219	YES	No	NF	1985	413	Llama	N/A	NO	FALSE
220	YES	No	Yes	1972	1707	Aycock	No Answer	NO	FALSE
221	YES	No	Yes	1979	225	Nutria	No Answer	NO	TRUE
222	YES	No	Yes	1982	2129	Benjamin	SELF	NO	FALSE
223	RENT	RENT	No	1989	205	Mink	N/A	NO INF	FALSE
224	YES	No	Yes	1957	2109	Esteban	Can't remember	NO	FALSE
225	YES	SOLD	No	1978	1933	Rose	N/A	NO	TRUE
226	YES	No	No	1976	1703	Alexander	N/A	NO	FALSE
227	N/A	No	Yes	1965	205	Nutria	Can't remember	NO	FALSE
228	YES	No	Yes	1951	1502	Alexander	No Answer	NO	FALSE
229	YES	No	No	1989	1414	Mehle	N/A	NO	TRUE
230	YES	SOLD	No	1987	620	Perrin	N/A	NO	FALSE
231	RENT	RENT	NO	1987	8508	Benjamin***	N/A	NO	TRUE
233	YES	YES	NO	1989	112	Coney	N/A	NO	FALSE
234	YES	No	NF	1975	1617	Aycock	N/A	NO	FALSE
235	YES	SOLD	Yes	1960	213	Nutria	No Answer	NO	FALSE
236	YES	No	NF	1976	1913	Rose		NO	TRUE
239	YES	No	NF	1978	1952	Benjamin	None as owner	NO	FALSE
237	YES	YES	YES	1988	629	Cougar	SELF	NO	FALSE
238	NO ANSWER	No	No Ans	1979	1923	Rose		NO	TRUE
241		No		1985	2006	Benjamin		NO	TRUE
242	YES	No	Yes	1965	1937	Rose	N/A ???	NO	FALSE

Appendix 7.

Table 14. Property Values & Desire to Sell

243	YES	No	Yes	1981	1809	Aycock	SELF	YES	FALSE
245		No		1952	1809	Rose		NO	FALSE
246	DON'T KNOW	NO	No Answer	1981	1200	Perrin	No Answer	NO	FALSE
247	YES	No	No	1969	1612	Aycock	N/A	NO	TRUE
248	YES	No	Yes	1961	1927	Rose	SELF	NO	FALSE
250	YES	Yes	Yes	1981	2411	Delery	No Answer	NO	TRUE
251	YES	No	Yes	1961	2316	Benjamin	LCD Home Remodel	NO	FALSE
252		No		1984	1923	Karl		NO	FALSE
331	YES	SOLD	YES	1979	1807	ROSE	DON'T KNOW	NO	FALSE
337	YES	SOLD	YES	1983	1204	PERRIN	No Answer	NO	FALSE
343	????	????	????		112	CONEY	??????	NO	FALSE
356				0	0			NO	FALSE
280	POSSIBLE	N/A	YES	1965	1946	ROSE	No Answer	NO	FALSE
281	YES	SOLD	YES	1972	1930	ROSE	Not as owner	NO	FALSE
284				0	0			NO	FALSE
285				0	0			NO	FALSE
295	YES	SOLD	NO	1982	1819	Angela	N/A	NO	FALSE
360				1960	1831	ROSE		NO	FALSE
426	YES	No	No	1988	7208	Patricia	None	NO	FALSE
444	YES	SOLD	No	1977	1933	Rose	N/A	NO	FALSE
448	YES	No	No	1979	1815	Rose	N/A	NO	TRUE
491	YES	No	No	1975	536	Esteban	N/A	NO	FALSE
493	NO ANSWER	SOLD	Yes	1965	1911	Rose	No Answer	NO	FALSE
496	YES	No	???	1979	1918	Rose	Not as resident	NO	FALSE
350				0	0			NO	TRUE
365				0	0			NO	TRUE
384				0	0			NO	TRUE
424				0	0			NO	FALSE
431				0	0			NO	FALSE
464				0	0			NO	FALSE
471				0	0			NO	FALSE
492				0	0			NO	FALSE
498				0	0			NO	FALSE
499				0	0			NO	FALSE
500				0	0			NO	FALSE
502				0	0			NO	TRUE
503				0	0			NO	FALSE
504				0	0			NO	FALSE
527				0	0			NO	FALSE
506				0	0			NO	FALSE

Table 14. Property Values & Desire to Sell

227

(1)

CALVIN: I MAY HAVE
GIVEN YOU A COPY OF
THIS
MPT

9/13/91

DEAR RON:

YOUR ELECTION CAMPAIGN ADVERTISEMENT
IN THE ST. BERNARD NEWS OF 9/10/91
REALLY CAUGHT MY EYE WHEN I NOTICED
THE WORD "IMAGE". HOW DO YOU THINK
A PERSON WANTING A PLACE TO LIVE
FEELS ABOUT ST. BERNARD? LET ME
TELL YOU HOW - JUST TAKE ARABI, AS
AN EXAMPLE - A PERSON OR FAMILY WANTING
TO LIVE IN ARABI BECOMES DISGUSTED WHEN
THEY VIEW WHAT IS ALLOWED TO GO ON
IN OUR RESIDENTIAL AREAS - R-1. LET
ME LIST SOME OF THE THINGS WHICH
TURN PEOPLE OFF.

- 1) DUMP TRUCKS AND LARGE TRAILER
TRACTORS ARE PARKED IN OUR STREETS
AND DRIVEWAYS.
- 2) TRASH IS ALLOWED TO STAY IN
VIEW OF PEOPLE FROM THE STREET.
THAT IS TRASH IN DRIVEWAYS, FRONT
YARDS, AND BACK YARDS.
- 3) JUNKED CARS ARE ALLOWED TO
REMAIN IN THE STREETS IN SPITE
OF THE CITIZENS DOING THEIR
BEST TO GET RID OF THEM.
- 4) MOBILE HOMES ARE ALLOWED IN
BACK YARDS.

THIS COULD
BE JUNKED
CARS, TRAILERS
ETC

ACIA- 0440

(2)

- 5) SERVICE VEHICLES, U-HAULS, etc ARE ALLOWED to PARK IN RESIDENTIAL AREAS.
- 6) SCHOOL BUSES - A PARTICULAR CASE HAS BEEN RULED TO BE A pool VAN - B-7 THIS IS A 24 PASSENGER BUS - RULED by the planning COMMISSION - SUGGEST THAT (I) WE SUE THE PLANNING COMMISSION to change that RULING. THESE SCHOOL BUSES TAKE UP NEEDED PARKING SPACES - CREATE A SAFETY HAZARD to people trying to leave their HOME. THIS ONE CASE DOES NOT CREATE A GOOD IMAGE.
- 7) BOATS ARE NOW PARKED ALL OVER - A SORRY SIGHT. THE ABOVE CASES COULD BE RESOLVED IF THE PARISH WOULD ENFORCE SEC 20-144.1 AND SEC. 11-28 OF THE PARISH CODE. THE ENFORCEMENT OF JUST THESE TWO ORDINANCES WOULD REALLY IMPROVE THE IMAGE OF ARABI.

ANOTHER PROBLEM THAT SHOULD BE FACED IS THE INDISCRIMINATE PARKING OF RECREATIONAL VEHICLES ON SIDEWALKS, IN THE STREETS, BETWEEN THE SIDEWALK AND THE STREET, AND IN THE FRONT OF RESIDENCES. A SIMPLE SOLUTION WOULD BE TO ALLOW PARKING OF RV'S IN DRIVEWAYS NOT EXTENDING PAST THE FRONT LINE OF A RESIDENCE. THIS IS NOT COVERED IN ANY ORDINANCE. VISITORS to ARABI CAN'T BELIEVE WHAT THEY SEE REGARDING RV'S,

ACIA-0441

(3)

RON, I WISH YOU WELL IN THE COMING ELECTION, BUT MANY VIOLATIONS OF THE PARISH CODES ARE HAPPENING WITH YOUR KNOWLEDGE. IT IS A SAFE BET THAT WE COULD WRITE UP 40 VIOLATIONS DURING A TWO-HOUR RIDE IN ARABI.

OF COURSE, AS A PRIVATE CITIZEN ALL I CAN ASK OF THE PARISH PRESIDENT IS TO ENFORCE THE LAWS IN THE PARISH CODE.

THE VIOLATIONS OF THE PARISH CODES IN ARABI RESULTS IN A BAD WAY. WE ARE LETTING THE VALUES OF OUR HOMES DECREASE BECAUSE NO ONE CARES TO ENFORCE THE LAWS.

SINCERELY,

P.S.

I AM MAKING A COPY OF THIS LETTER AVAILABLE TO MY FRIENDS. MANY OF WHOM THINK THE WAY I DO. WHY DO WE ALLOW ARABI TO BECOME TRASHY?

ACIA- 0442

Group watches out for junk

By STEVE CANNIZARO
St. Bernard/Plaquemine bureau

is a junk
-car vigilante.

The Arabi man has made it his business to tell parish authorities about residents who leave their junked vehicles on the street or in their yards.

"I've taken some flak," said president of the Arabi Civic and Improvement Association.

But he won't apologize for himself or members of his organization who regularly patrol Arabi, looking for violators of two parish ordinances concerning junked vehicles and machinery.

"I feel I have a mandate from our (association's) governing body to try to make this a decent place to live," said.

The 250-member civic group gathers information and takes complaints from residents about violations and passes them on to parish inspectors, he said.

But the parish hasn't been as responsive as the Arabi group would like.

"I don't get the feeling the parish cares. You have to argue with them," said Fauchaux, who is retired and spends a lot of



, president of the Arabi Civic and Improvement Association, rides around neighborhoods looking for junk or wrecked cars.

time looking for violators.

Riding around Arabi recently, pointed out a house with an old junked vehicle in the yard.

"This is what makes a neighborhood crummy," he said.

"If people don't operate in a neighborly fashion, they aren't neighbors. They're just residents who don't care what they do to your property value. 'Neighbor' is a sacred word to me."

In the past couple of years, the civic association has told the parish about more than 60 junked vehicles.

said the parish is beginning to respond to the complaints on cars on the streets.

Parish inspectors attach stickers to the cars. Owners have 36 hours to move the vehicles before they are towed at the owner's expense.

But when it comes to junked cars on private property, the parish is "not as energetic," said.

Parish law says storing junked vehicles or machinery on private property is illegal if the items are in public view.

When junked items are on private property, law requires the owner to be given 10 days' notice.

John Carney, chief administrative officer for St. Bernard Parish, said towing junked vehicles from private property is a sensitive issue.

"We don't want to be like a Gestapo or something," he said. "We work with the people complaining as well as those who may be in violation in order to work out the problem. We don't compromise the ordinance and its intent."

October 24, 1994

Appendix 10.

Councilman At Large
Daniel Dysart
8201 W. Judge Perez Drive
Chalmette, LA 70043

Dear Danny:

I attended the Council Meeting on 10/18/94. I applaud the effort to make our littering laws stronger, but until enforcement is practiced, we are still in a mess.

Case in point - Parish Codes 11-27 and 11-28 are supposed to control junk and junk cars. The Arabi Civic and Improvement Association (ACIA) has been working hard to get those codes enforced. Our parish inspectors are timid and don't want to hurt feelings.

There are many items that could help the image of St. Bernard. Suppose that you are a Chief Executive Officer (CEO) of a Fortune 500 company and are planning to locate a new plant (500 employees) and you are scouting to pick a plant site. You would want the employees to live in St. Bernard - right! Let's take a tour of St. Bernard living environment:

1. We allow people to junk cars on their residence area.
2. Boats are junked and parked on front lawns and parked on our streets.
3. Dump trucks are allowed to park on our streets.
4. Recreational vehicles (RVs) are allowed to park on streets between sidewalks and the street, and on paved front lawns.
5. Residents are allowed to pave over drainage right-of-ways to park (RVs) in the neighborhoods.
6. Some street signs are missing and others are bent at various angles.
7. Street markings (white) at intersections are now non-existent.
8. Our streets are in deplorable condition. Case in point:
 - a. Ride Rowley Boulevard from Patricia Street to St. Bernard Highway in Arabi.
 - b. Ride on Patricia Street and Genie from Angela Street to Paris Road.
 - c. The above are only two examples. There are many more.
 - d. Repairs of streets seem to be of no concern to the Parish.

ACIA- 0697

Page 2
Daniel Dysart
October 24, 1994

9. Cars are allowed to park across sidewalks.
10. Blue tarpaulins are allowed to be hung across carports to shield junk.
11. Automobile repair work is allowed in our residential areas, with and without signs to advertise.
12. Fencing on our recreational playgrounds are in deplorable condition.
13. The use of "non-standard" garbage cans should be addressed. "Standard" garbage cans have tight fitting covers. Some of these "non-standard" cans remain in front of residences 24 hours per day.
14. The crepe-myrtle trees in front of the government complex area are in need of attention. Some are dead, some are bent over - does not look good.

Would the 14 items mentioned above impress a CEO of a Fortune 500? You bet it would - in a negative way?

Until all our laws are enforced, both by the Sheriff and the Parish Government, we will continue to impress negatively. Maybe a solution would be to have one enforcing body.

Again, I applaud the littering amendments, but would it cover this situation - dumping automobile ashtrays on shopping center parking areas and letting the wind blow the trash into our streets. Add disposal diapers to the cigarette trash. Would our littering law cover this?

Yours for a better St. Bernard,

ACIA- 0698

KEEP ST. BERNARD NEAT & CLEAN

2/8/95

MRS GLORIA C.

ATTACHED IS TWO UPDATED SHEETS OF JUNK PROBLEMS IN ARAB.

WHEN APPLYING CODE 11-28 - JUNKCARS AND JUNK IN YARDS, PLEASE TELL THE INSPECTORS THAT THIS CODE IS PLAIN. REMOVE THE JUNK OR BUILD A FENCE AROUND THE PROPERTY.

I DON'T UNDERSTAND THIS. IF WE WANT A NEAT AND CLEAN ST. BERNARD WHY CAN'T THIS SIMPLE LAW BE ENFORCED. ONE JUNKED UP PLACE AFFECTS AT LEAST FIVE NEIGHBORS DIRECTLY. THEY HAVE TO APOLOGIZE TO VISITORS THAT THE JUNK THEY FACE EVERYDAY CAN'T BE REMOVED OR HIDDEN.

COULD THE INSPECTORS CHECK FOR CURRENT TAGS ON RECREATIONAL VEHICLES AND TRAILERS? SOME HAVE NOT MOVED IN TWO YEARS

CC: CALVIN CALLAIS
DANNY DYSTAT.

Appendix 11.

ACIA- 0638

①

KEEP ST. BERNARD NEAT & CLEAN

2/8/95

LOCATION	COMPLAINT	REMARKS
N 7206 SIDNEY	CAR MOVED TO FRONT YARD - GARAGE	
OK 1828 BENJAMIN	ABANDONED	CAR WAS MOVED TO DRIVEWAY.
N 1834 ALEXANDER	VAN MOVED TO BACKYARD WRECKED STATION WAGON STILL ON STREET	
N 1723 CENTER	TRUCK - JUNK	MOVE TO REAR OF DRIVEWAY
304 SERPAS (COVERED)	CAR - BLUE - JUNK	MOVED FROM STREET TO DRIVEWAY.
N 1906 ALEXANDER	CAR MOVED FROM LAWN TO STREET RIGHT OF WAY. JUNK.	A "FOR SALE" WAS WRITTEN ON IT. LOOK AT GUNS UNDER CAR.
N 1813 AYCACH	JUNK IN YARD - EYESORE	CAR WAS MOVED.
N 1904 ESTEBAN	CAR JUNKED. IN CARPORT.	THIS HAS BEEN REPORTED FOR THE PAST 4 YEARS.
1934 BENJAMIN	CAR AND TRUCK ABANDONED.	CAR WAS PUSHED FROM FRONT LAWN TO DRIVEWAY. TRUCK WITH NO LICENSE PARKED BEHIND IT. HAS NOT MOVED IN MONTHS.
N 1936 ROSE	JUNK ALL OVER PLACE. WHITE VAN DOES NOT MOVE.	
N 1834 CENTER	TOTAL EYESORE	TRUCK AND CARS ABANDONED IN DRIVEWAY.

ACIA- 0639

(2)

KEEP ST. BERNARD NEAT AND CLEAN

2/8/95

LOCATION	COMPLAINTS	REMARKS
N COUNCIL ON AGING PARKING 1818 LOT - CENTER ST	DUMP TRUCKS (2) PARTS HERE.	REAL MESS BRIVING THROUGH NEIGHBOR HOOD
N 1664 SCHNELL	ABANDON TRUCK	
N 2316 AYLOCH	JUNK CAR ON SIDE OF HOUSE	
1 1800 AYLOCH	RED CAR - NO LICENSE IN STREET - FOR SALE SIGN	CHECK SMALL TAVERN FOR PROPER LICENSE FOR SALE SIGN IS BOGUS
1 1339 ANGELA	COMPLETE MESS - JUNK CAR, TRASH ALL OVER	REAL PROBLEM
1 7260 PATRICIA	REAL EYE SORE - BOARD OF HEALTH SHOULD BE CALLED IN	HOUSE IS ALSO A PIG PEN LOFT.
N 1215 FRISWILL	BLACK CAR ABANDONED	
N 7235 PATRICIA	REPAIR SHOP BEING OPERATED IN DRIVEWAY	REAL EYE SORE
N 2106 MEHLE	PLACE REALLY TRASHED UP	
N 1512 ALEXANDER	VEHICLE ABANDONED IN BACKYARD.	
1 1809 SCHNEGG	TRASH - APPLIANCES STORE	REAL EYE SORE
1 1708 SCHNELL	JUNK CAR.	
1 1804 CENTER	JUNK CAR	DUMP TRUCK ALSO PARTS HERE.

ACIA- 0640

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BATES NO.	DATE	DOCUMENT TYPE	AUTHOR(S)	ADDRESSEE(S)	DESCRIPTION
ACIA 0001-3	12/4/91	Newsletter	Non-Plaintiff	Members	Christmas social planned at St. Louise school; general neighborhood topics.
ACIA 0004/58	7/7/90	Newsletter	Unsigned	Members	Letters sent to Tauzin re garbage odors; Mentions Tauzin's letter to Templet protesting dump location; health census to be sent out to all members. DEQ emergency phone number provided; request for members to call whenever they smell garbage and note time and date of call.
ACIA 0005-06 ACIA 0050-51	6/5/91	Newsletter	Non-Plaintiff	Members	Information meeting 5/28/91 with BFI re gas and leachate collection systems to be built at dump. Assured no danger of accidents (explosions). Plans to expand the "obnoxious and hazardous dump across Bayou Bienvenue.
ACIA 0007-08 ACIA 0040-41	6/93	Newsletter	Non-Plaintiff	Members	Last month able to enjoy being outdoors w/out stench of "eau de dump." Garbage dumping has been terminated. Status of "multiple plaintiff action against BFI" planned for June meeting.
ACIA 0009/17/22 ACIA 0594	7/96	Newsletter	Plaintiff #251	Members	Plaintiff #200 moving from area. Next meeting at St. Louise Parish Center.
ACIA 0010	1/96	Newsletter	Plaintiff #200	Members	Door prizes, half & half raffle, refreshments at Jan meeting-St. Louise de Marillac.
ACIA 0011/13/24	1/97	Newsletter	Plaintiff #251	Members	Meeting notice-St. Louise school.
ACIA 0012/25	4/97	Newsletter	Plaintiff #251	Members	Meeting notice; announcements. St. Louise school.
ACIA 0014-15	9/2/92	Newsletter	Non-Plaintiff	Members/Friends	ACIA's past focus on surveillance/closure of dump. Possibility BFI will transport leachate to St. Bernard Sewer Plant. Plaintiff #251 and Plaintiff #200 spoke with STB commission with concerns. Exnicios will provide update on progress of lawsuit at September meeting.
ACIA 0016/27	10/97	Newsletter	Plaintiff #251	Members	Exnicios to provide update on lawsuit at Oct meeting.
ACIA 0018/26	7/97	Newsletter	Plaintiff #251	Members	No business meeting; social planned.
ACIA 0019/678	10/95	Newsletter	Plaintiff #200	Members	Year in Review. Phone #s to report potholes, eyesore, & suspicious activity. No phone numbers listed for obnoxious orders. 9/94-Report by Mathes (DEQ) re dump closure; update by Exnicios. 1/95-Joint meeting BFI,DEQ,ACIA re dump closure; Chance to win \$50 for bringing in new member. 3/31/95- Two complete years dump stopped receiving garbage. 4/95-Murphy Oil rep addressed membership re Cleanest Parish award. 7/95-Exnicios update on "dump" lawsuit. 9/95-Election forums.
ACIA 0020	1/96	Newsletter	Plaintiff #200	Members	Meeting notice/general announcements.
ACIA 0021	4/96	Newsletter	Plaintiff #200	Members	Meeting notice/general announcements.
ACIA 0023	10/96	Newsletter	Plaintiff #251	Members	Exnicios update on lawsuit planned.
ACIA 0028	7/95	Newsletter	Plaintiff #200	Members	Exnicios update on lawsuit. Notes too many vehicles parked on sidewalks. Numbers to call for potholes/suspicious activities; no mention of odor numbers. Mentions contest re "mysterious boxes" in 6/23/95 St. Bernard Voice. Contest unauthorized and voided.
ACIA 0029	4/95	Newsletter	Plaintiff #200	Members	Update on Murphy Oil contest for cleanest parish award. Junk car eyesores. Phone numbers for potholes/suspicious activities. Notes two years since dump stopped receiving garbage. People feeling better.

Source: Author

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ACIA 0030/592	9/94	Newsletter	Plaintiff #200	Members	Mathes (DEQ) will discuss DEQ's plans to provide final cover, collect leachate, and dispose of methane gas for dump closure. Exnicios lawsuit update planned.
ACIA 0031-32 ACIA 0035-36	6/94	Newsletter	Plaintiff #200	Members	Dump stopped accepting garbage 3/31/93 – "what a relief to get rid of that odor!" Exnicios update. Numbers for potholes, eyesores. Junk car problems discussed.
ACIA 0033-34	3/94	Newsletter	Plaintiff #200	Members	Landfill committee active with DEQ re dump closure; mentions relief to get rid of "that odor!" Exnicios update & Val's concern on lack of progress in reaching final dump closure. Numbers for potholes, eyesore, and suspicious activities only.
ACIA 0037-38	12/93	Newsletter	Non-Plaintiff	Members	Discusses BFI's two proposals for dump closure. Members attended 11/16/93 hearing at courthouse. Junk car problem discussed.
ACIA 0039	9/93	Newsletter	Non-Plaintiff	Members	Push for clean-up of Arabi (litter and junk cars). Update by Exnicios on lawsuit.
ACIA 0042	3/93	Newsletter	Non-Plaintiff	Members	\$499.12 reimbursement of dump committee for travel expenses, phone calls, copies/photos related to hearings/research.
ACIA 0043	12/92	Newsletter	Non-Plaintiff	Members	Plaintiff #251 & Plaintiff #200 appointed to Citizens Task Force re solid waste disposal. Recently elected JOP, Scheuermann resigned from board. Shut down of dump scheduled for 3/93.
ACIA 0044-45	6/1/92	Newsletter	Non-Plaintiff	Members	Garbage piled higher and deeper at BFI dump. Exnicios to provide update on lawsuit "so many of us are involved in. These things take time, but they are moving along." Site adjacent to Crescent Acres has been rejected as new dump site.
ACIA 0046-47	3/92	Newsletter	Non-Plaintiff	Members	"Tired of being DUMPED on? Most residents are being affected by this noxious dump, whether we realize it or not." Because of it, many of us have developed health problems, or have existing condition worsen...Our property values have decreased." Exnicios will update on lawsuit. Request attendance at STB council chamber for meeting re new dump site selection. Environmentalist Linda King scheduled to speak at next meeting to discuss health hazards of having landfill near homes.
ACIA 0048-49	9/91	Newsletter	Non-Plaintiff	Members	20 ACIA members took part in public hearing to create major landfill from 9 th ward to Bayou Bienvenu; permit denied.
ACIA 0052-53	3/6/91	Newsletter	Non-Plaintiff	Members	Bring questionnaires to meeting or send them to Exnicios ASAP. Cardon resigned as VP; replaced by Janet Creighton.
ACIA 0054-55	12/1/90	Newsletter	Non-Plaintiff	Members	Exnicios update at next meeting. Emergency DEQ number for dump odors listed.
ACIA 0056-57	8/18/90	Newsletter	Plaintiff #200	Members	Exnicios update. Plaintiff #251, Plaintiff #200, & Devine on committee to prevent dump expansion. Few unconcerned residents are "lowering your property values by lack of care of their property." Emergency DEQ # for dump garbage odors.
ACIA 0060/688	6/24/94	News Article	Plaintiff #200		St. Bernard Voice article on how to keep property values high.
ACIA 0061/689	8/12/94	News Article	Plaintiff #200		St. Bernard Voice article includes mention of dump closure efforts; relief to get rid of odor; Exnicios waiting for results from 11/16/93 hearing with Judge Zaccaria.
ACIA 0062/690	9/16/94	News Article	Plaintiff #200		St. Bernard Voice article re junk cars in neighborhood.
ACIA 0063/691	10/21/94	News Article	Plaintiff #200		St. Bernard Voice article outlining ACIA's record on key issues such as dump closure; junk cars; indiscriminate parking in front lawns, sidewalks, and right of ways.

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ACIA 0064/302/692-3	12/2/94	News Article	Plaintiff #200		St. Bernard Voice article notes that mod of living would have to change to improve overall value of properties. Lists suggestions for improving neighborhood.
ACIA 0065-67	5/8/94 10/6/96 10/4/96	News Release	Unsigned	TP-TB, STB Voice & News	Meeting notices and speaker information.
ACIA 0068-107	1996	Roster			Sign-in sheets; roster of paid members and non-renewed members. Also indicates members too poor to pay dues.
ACIA 0108	Undated	Listing			List of officers
ACIA 0109	11/16/95	Agenda	ACIA Board Meeting		General business agenda.
ACIA 0110/596-98	1995/-96	Newsletter	Plaintiff #200	Board Members	Notes decrease in membership, dump closed properly 3/13/93, misc business items, roster of board members, meeting schedules for 1995-96, committee assignments, election ballots, and picture in TP of newly elected officers.
ACIA 0117-37 ACIA 0303-306	1990-95	Bylaws			Bylaws, membership information, corrections and addendum to bylaws.
ACIA 0138	Undated	Cover Page			Kaiser Aluminum Cover Page "Our Retirement"
ACIA 0139-42 ACIA 0604	4/12/95	Handwritten Minutes	Unsigned		Exnicios asked if all members were interviewed by his assistants. Speaker from TP. Exnicios noted that we get a lot of press from TP. 37 members present. Subsequent meeting with DEQ/BFI/ACIA 1/26/95 to discuss clean up plan for closed landfill attended by 44 members/25 guests. Guests primarily from DEQ and BFI.
ACIA 0143-44	6/8/94	Handwritten Minutes	Unsigned		Guest speaker from Red Cross Hurricane Disaster Unit.
ACIA 0145-46	3/9/94	Handwritten Minutes	Unsigned		General business discussion re neighborhood problems; Plaintiff #251 reported on latest info re dump closure; numbers to call for potholes, police, etc.
ACIA 0147-48	9/14/94	Minutes	Unsigned		Mathes, DEQ speaker, discussed status of final closure of dump. Exnicios urged all people in lawsuit to cooperate with his staff to provide documentation to set the value of their homes. Exnicios provided refreshments for meeting.
ACIA 0149-50	12/8/93	Minutes	Unsigned		Plaintiff #251 reported on final closure of dump; no decision on how leachate to be collected or final cover to be used for dump. Members voted to take no action re new N.O. dump site. Problem of junk cars addressed.
ACIA 0151-52	9/15/93	Minutes	Unsigned		Plaintiff #251 awarded certificates to all who helped with dump closure. Exnicios reported on lawsuit status. Exnicios conducted ACIA elections.
ACIA 0154	6/9/93	Minutes	Plaintiff #105		Update from Exnicios on progress of lawsuit; must remain alert to ensure BFI closes dump properly. Plaintiff #251 will host block party in October.
ACIA 0155-56	1/18/96	Minutes	Unsigned		Exnicios update on lawsuit. Parish officials present for question/answer session.
ACIA 0157-58	10/17/96	Minutes	Plaintiff #105		Parish Engineer, Bob Turner, advised that pellets could be picked up at Lake Borgne Levee Board office or at Mosquito Control office to combat nutria problem along the banks of the canals. Report anyone throwing trash in canals.
ACIA 0159	7/18/96	Minutes	Plaintiff #105		Discussion re zoning changes and opposition to Winn Dixie.
ACIA 0160	4/18/96	Minutes	Plaintiff #105		General business discussion; speaker from Entergy.

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ACIA 0161	1/16/97	Minutes	Plaintiff #105		General business discussion; speaker re Islanoes.
ACIA 0162	4/17/97	Minutes	Plaintiff #105		Discussion re failed millage renewal.
ACIA 0163	6/20/96	Minutes	Plaintiff #105		Board meeting minutes. Plaintiff #251 suggested logo for letterhead but all agreed expense unnecessary.
ACIA 0165-68 ACIA 0216-19 ACIA 0679-683 ACIA 742-43	1994-95	Newsletter	Plaintiff #200		Closure of dump 3/31/93. Efforts to remove junk cars and enforcement of code re parking of certain vehicles in neighborhood. Meeting schedule for year.
ACIA 0168-72	8/23/95	Notes	Plaintiff #200		Planning notes for election forum.
ACIA 0173-74 ACIA 0669-70	11/9/94	Handwritten Notes	Plaintiff #200		Exnicios reimbursed ACIA \$192 for September General Meeting refreshments. General business.
ACIA 0175-76 ACIA 0672	11/3/94	Memo	Council "A"	Dean	Enforcement of codes re junk and abandoned vehicles.
ACIA 0177-78	3/21/96	Agenda	Plaintiff #200		Board Meeting business. Plaintiff #200 notes he has put house up for sale and will move out of Arabi as soon as sold. "Important thing is that we leave as friends."
ACIA 0179	2/15/96	Agenda	Plaintiff #200		Board Meeting. Resignation of Plaintiff #190. No mention that Plaintiff #200 leaving too.
ACIA 0180	11/16/95	Agenda	Plaintiff #200		Board Meeting. General business discussion.
ACIA 0181	8/9/95	Agenda	Plaintiff #200		Board Meeting. Notes unauthorized paid ad in St. Bernard voice; not sanctioned by board. Discussion (Plaintiff #251) on flyer to Arabi residents re potential danger of dump becoming active.
ACIA 0182/287	6/14/95	Agenda	Plaintiff #200		Board Meeting. General business discussion.
ACIA 0183/634	4/10/95	Agenda	Plaintiff #200		Board Meeting. DEQ/BFI dump update by Plaintiff #251.
ACIA 0184/637/726	2/8/95	Agenda	Plaintiff #200		General business discussion. Notes attendance at special meeting (44 members, telephone activated committee/25 guests {8/BFI; 6/DEQ})
ACIA 0185	1/9/95	Agenda	Plaintiff #200		Board meeting general business discussion.
ACIA 0186/262-3	10/12/94	Agenda	Plaintiff #200		Board meeting; Plaintiff #251 update on dump.
ACIA 0187/230	8/8/94	Agenda	Plaintiff #200		Board meeting discussion re dump update for general meeting with invitation to DEQ secretary to speak. "Also a report or letter from Val E. would make this meeting attractive."
ACIA 0188-90	8/1/94	Newsletter	Plaintiff #200		Handwritten notes for newsletter addresses junk car problem; indiscriminate parking of campers, boats, RVs, trucks etc on front lawns and sidewalks and other business matters.
ACIA 0191	7/13/94	Agenda	Plaintiff #200		Board meeting agenda includes parking and junk car problems.
ACIA 0192/259	6/6/94	Agenda	Plaintiff #200		Board meeting agenda; general business matters.
ACIA 0193/242	12/8/93	Agenda	Plaintiff #200		Quarterly meeting agenda; mentions hearing on junk cars.
ACIA 0194/235	2/9/94	Agenda	Plaintiff #200		Board meeting; Landfill committee report; junk car report.
ACIA 0195	Undated	News Release	Unsigned		Article for St. Bernard News expressing appreciation for space.
ACIA 0196/236/240 ACIA 0322	1/24/94	Memo	Plaintiff #200	Board	Summary of meeting 11/19/94 with Sheriff and Chief Deputy re code violations.
ACIA 0197	1/25/94	Form Letter	Plaintiff #200	Sheriff Stephens	Form Letter to report code violations to Sheriff.

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ACIA 0198	Nov	Calendar			Calendar for news releases.
ACIA 0199/257	10/13/93	Agenda	Plaintiff #200		General business matters. List of ex-members mentioned but not attached.
ACIA 0200/244/256	11/10/93	Agenda	Plaintiff #200		General business matters.
ACIA 0201/241	1/12/94	Agenda	Plaintiff #200		Board Meeting agenda. Update on dump by Plaintiff #251; other business matters.
ACIA 0202/234	3/7/94	Agenda	Plaintiff #200		Board meeting agenda. Mentions report by Plaintiff #251 on water permit.
ACIA 0203	3/9/94	Agenda	Plaintiff #200		General meeting agenda; notes Plaintiff #251 report on status of landfill closure.
ACIA 0204	4/13/94	Agenda	Plaintiff #200		Notes Plaintiff #251 report on water permit, final cover, and leachate collection system for dump.
ACIA 0205/258	5/11/94	Agenda	Plaintiff #200		Report on code violation list; report by Plaintiff #251 on dump (water and cover)
ACIA 0206-213	1/21/95	Roster			1994-95 membership roster
ACIA 0215-16	9/1/93	Cover Page			Table of Contents Cover Page: Charter, Bylaws, Application, News Letters, Membership Roster
ACIA 0220-21	Undated	Statement	Plaintiff #200		Statement of Concern re exempting St. Bernard Parish from its own ordinance re treatment, storage, and disposal of solid, industrial, and/or sewerage waste. Change in ordinance to allow tire disposal at Agriculture Street location.
ACIA 0222	7/18/96	Minutes	Plaintiff #105		Minutes of 4/18/96 meeting with guest speaker from Entergy.
ACIA 0223/887	10/17/94	Complaint	Plaintiff #200		List of 18 locations in violation of parish codes.
ACIA 0224-25	Undated	Code			Health and Sanitation code re storage of junk on public and private property.
ACIA 0226	7/13/94	Agenda			Board Meeting Agenda mentions dump update from Plaintiff #251; progress on junk cars.
ACIA 0227	8/31/94	Agenda			Board Agenda. General business matters.
ACIA 0228/265/318	8/2/94	News Article	Cannizaro		TP-STB article on Plaintiff #200, junk car vigilante.
ACIA 0411-12/705					
ACIA 0229	5/12/94	Memo	Plaintiff #200	Carney, CAO S.B.	Thanks for responding to list of code violations.
ACIA 0231	8/8/94	Agenda	Plaintiff #200		Board Meeting Agenda; DEQ speaker; Exnicios speaker.
ACIA 0232/605	4/18/94	Memo	Plaintiff #200	Carney	6 reported code violations.
ACIA 0233	4/13/94	Agenda	Plaintiff #200		Report on water permit, final cover, and leachate collection by Plaintiff #251; List of code violations discussed.
ACIA 0237	No. 3-94	Report	Plaintiff #200	Sheriff Stephens	Code Violation Report (4 violations).
ACIA 0238	No. 2-94	Report	Plaintiff #200	Sheriff Stephens	Code Violation Report (7 violations).
ACIA 0239	No. 1-94	Report	Plaintiff #200	Sheriff Stephens	Code Violation Report (7 violations).
ACIA 0243	12/6/93	Agenda	Plaintiff #200		Board Meeting Agenda. Letter from Solid Waste Division acknowledging receipt of ACIA letter re clay cap at dump. Discussion re proposed amendment to junk car code; other general business matters.
ACIA 0245/760	11/29/93	Correspondence	Plaintiff #200	Dean	Complaint re shoddy repair of sidewalks with asphalt rather than concrete; property value issue and unsightly.
ACIA 0246	11/12/93	Correspondence	Mollere	Plaintiff #200	Acknowledges receipt of 9/21/93 letter re public notice in newspaper. ACIA expresses environmental concern re construction of clay cap at dump.
ACIA 0247	10/29/93	Public Notice	TPA		Council proceedings 10/5/93 re junk car ordinance.

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ACIA 0248	Undated	Fact Sheet	Tulane Env Clinic (?)		Fact Sheet on Proposed Newport Landfill
ACIA 0250	10/20/93	Correspondence	Ponstein	Plaintiff #200	Public hearing 10/26/93 re conditional use approval to permit sanitary landfill in Orleans Parish bounded by Gulf Intracoastal Waterway, Bayou Bienvenue, and Paris Road.
ACIA 0251	11/4/93	Correspondence	Ponstein	Plaintiff #200	Thanks for attending public hearing re proposed landfill.
ACIA 0252-54	10/25/93	Correspondence	Kattengell	Mollere	Certified copy of resolution requesting public hearing before considering exemption request by BFI to construct claycap at dump.
ACIA 0255	10/27/93	Correspondence		Plaintiff #190	Video about the good life in St. Bernard Parish.
ACIA 0260	6/8/94	Agenda	Plaintiff #200		Agenda. Discussion re no action noted on list of junk cars given to Carney in May; Red Cross speaker
ACIA 0261	Undated	Meeting Notice	ACIA		9/14/94 election of officers; DEQ speaker re BFI closure; Exnicios update.
ACIA 0264	9/25/94	News Article	Thomas		Jefferson Report: "Mounting opposition to a landfill." Discusses Plaintiff #251's role in closure of BFI dump and Ward proposal for state of the art landfill in Jefferson.
ACIA 0266	Undated	News Article	Turni		TP St. Bernard Metro: "Grass-roots drive paves way for new sidewalk."
ACIA 0267	Undated	Press Release	ACIA		Never printed. "If we improve our surroundings, the value of our properties will increase." With closure of dump, residents need to improve and maintain homes for property values to increase.
ACIA 0268	6/24	Press Release	ACIA		Printed. Key points for maintaining neighborhood. Addresses lawns, garbage containers, home maintenance and repair, and parking of vehicles.
ACIA 0269-70		Press Release	ACIA		Third in series. Copy of code article and definition of "junked vehicles" and "plain junk".
ACIA 0271-72/593	6/1/94	Invitation	ACIA		ACIA information and application for new members.
ACIA 0273-78	1993-94	Goals	Plaintiff #200		ACIA goals for coming year. Code enforcement; guest speakers; membership
ACIA 0279-80	4/26/95	Agenda	LA House of Rep		Bills in legislature to close jail in Jackson Barracks. TP article attached re house bill.
ACIA 0282/864	6/23/95	Correspondence	Plaintiff #200	Norfolk Southern	Request for engine car consideration re whistle blowing.
ACIA 0283-84/88-89	6/7/95	Agenda	Plaintiff #200		Board Agenda. General business matters.
ACIA 0285	6/7/95	Meeting Notice	STB Citizens for Envrmntl Quality		Meeting to discuss change in organizational structure. Video on incineration scheduled
ACIA 0286/622	6/23/95	Ad	St. Bernard Voice		Ad not sanctioned by ACIA. Plaintiff #200 blames Plaintiff #190 for ad placement.
ACIA 0290	5/9/95	Correspondence	Nunez	Plaintiff #200	Re: Plaintiff #200 visit to capitol to support closing jail at Jackson Barracks.
ACIA 0291	6/6/95	News Article	TP-Capitol Bureau		"Jackson Barracks jail to be closed"
ACIA 0292	4/10/95	Correspondence	STB Youth Found	Friends of Youth	Membership application and solicitation of funds
ACIA 0294	4/21/95	Correspondence	STB Clean Parish	ACIA	District Winner of Clean Parish Contest; will participate statewide
ACIA 0295-96	4/26/95	Correspondence	STB Coalition for Project Graduation	ACIA	Acknowledged donation for graduation night party.
ACIA 0298-99	4/15/95	Correspondence	STB Crippled Child...	ACIA	Request for fund raising drive.
ACIA 0300	5/18/95	Correspondence	STB Clean Parish	ACIA	Acknowledgment for STB entrance sign contribution.
ACIA 0301	Undated	Newsletter	LEAN		Opposition to HB 2184 on environmental audits.
ACIA 0307-11	1992	Roster	ACIA		Paid Members 1992.
ACIA 0312	1990-93	List	Plaintiff #200		Dates of ACIA Newsletters 1990-93.

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ACIA 0314	7/88	Ordinance	STB Police Jury		Ordinance re proper disposal of building materials.
ACIA 0315-16	9/20/94	Report	Dean		President's Report. References meeting with STB Water and Sewer 9/9/94 re 99 yr agreement with STB government unless dissolved sooner.
ACIA 0317	9/8/93	News Articles	Rodriguez/Dean		STB News. Two articles. "Duckweed & Quackers" by Rodriguez and "Proving a Point" by Dean. Mentions Dean rolling on ground and eating grass at the dump site and taking shot at Plaintiff #251 for working for STB Water & Sewer. Dean mentions various sources of terrible odors in his article: river traffic, sewage plants, pump stations, and raw garbage, litter in park. Request for help with catching nutria in ways not harmful to natural habitat.
ACIA 0319-21	8/4/94	News Article	Weiss		TP: "Parish reports surplus: Dean wants waste station"
ACIA 0323-26	11/19/92	Correspondence	Plaintiff #190	Council "A"	Revision of parish code re parking of certain vehicles in residential areas with sketch attachments
ACIA 0327-28/31	9/21/93	Correspondence	Plaintiff #200	LDEQ Solid Waste	Request for local public hearing re proposed change in claycap cover over Crescent Acres Landfill.
ACIA 0329	9/29/93	News Article	Schleifstein		TP: "N.O. plans landfill by Parish Road span."
ACIA 0330	10/1/93	Correspondence	Plaintiff #200	LDEQ	Proposed leachate collection system at the Crescent Acres dump
ACIA 0332-33	9/15/93	Agenda	Plaintiff #190		General business matters; Exnicios report; Swearing in of new officers by Exnicios.
ACIA 0335	9/17/93	Public Notice	LDEQ		Notice that BFI requests exemption to allow construction of clay cap at dump.
ACIA 0336-37	Undated	Notice	STB Safety & Permits		List of activities that do not require building permits.
ACIA 0338-374	Undated	Parish Code			STB Parish re Traffic (Chapter 20)
ACIA 0375-76	11/15/93	Correspondence	Plaintiff #200	Midboe-DEQ	Request for DEQ representative to make report to ACIA board re BFI dump closure. Meeting schedule attached.
ACIA 0377-410	Undated	Parish Code			STB Parish Code re Health & Sanitation (Chapter 11)
ACIA 0413-15	1/19/93	Extract	STB Council		Ordinance to amend zoning ordinance re home occupations.
ACIA 0416-19	Undated	Summary # 1120	Council "A"		Amendment introduced by Council "A" to amend parish code of ordinance re storage of junk on public property.
ACIA 0420	Undated	Draft	Plaintiff #200	Carney	Memo re code violations and suggestions for enforcement.
ACIA 0421-22	9/14/94	News Column	Dean		STB News: "My Cup Runneth Over". Mentions agreement passed by Water & Sewer Commission to review and work out differences with commission to turn over operations to public works department.
ACIA 0423	Undated	News Article	Hannigan		"Effects of a landfill's closure in St. Bernard." Unite behind Dean. Details economic impact of landfill closure on St. Bernard.
ACIA 0424	Undated	News Article	Squires		"An Offer the City Can't Refuse." Criticism of Sanitation Director/Mayor/city in not meeting with Refuse Recycling Management. The company is willing to pay the city a minimum of \$400,000 per year to clean up Recovery One.
ACIA 0425-26	4/8/93	News Article	Turni		TP article: "Judge could rule immediately on dump closure." Request by BFI to continue accepting garbage. Request denied by DEQ because landfill has no synthetic liner to prevent contaminated water from leaking into waterways.

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ACIA 0426-27	1/27/93	News Article	Turni		TP article: "State dumps extension for landfill: Arabi neighbors will fight discharge of site's water." Quotes BFI expert, Reimers, as saying that soil underneath landfill acts as unusual natural liner protecting surrounding area from leakage.
ACIA 0428	1/27/93	News Article	Turni		TP article: "Ailing neighbor blames dump" Article re Gourgues with comments from Exnicios.
ACIA 0429	12/14/92	Agenda	Solid Waste Mgt Seminar		Agenda with handwritten phone number and note: "Leachate should not be flowed through a sewer plant.
ACIA 0430-31	4/1/93	News Article	Turni		TP article: "Landfill: Residents Pay Final Respects." Arabi residents celebrate BFI dump closure.
ACIA 0432/530	10/6/92	Memo	Unknown	Dean, Council	ACIA request for STB Council to ask DEQ to hold public hearing on BFI's request for modification to height increase at dump.
ACIA 0433-34	9/22/92	News Article	Turni		TP Article: "BFI is seeking to extend life of local landfill." Notes Dean's support of permit extension for BFI.
ACIA 0435	11/9/93	News Article	Turni		TP Article: "Ruling: Landfill shut down...But judge moves up hearing date."
ACIA 0436	2/6/90	News Article	Hill		TP Article: "Permit extends St. Bernard landfill by 3 years"
ACIA 0437/65-66	Unknown	News Article	Turni		TP Article: "Owners end fight to reopen landfill."
ACIA 0438	Unknown	Questions	Unknown		Page 2 of comments re Mr. Dean's Report #42. (Page 1 @ ACIA 0438) #10 notes that sewage odors is not the problem.
ACIA 0439-42	Unknown	Memo	Plaintiff #200		Transmittal of letter addressed to Ron listing code violations which result in decrease in property values in Arabi.
ACIA 0443-44	12/11/91	Memo			Names and phone numbers of those who helped with junk car situation.
ACIA 0445-47	10/23/90	Correspondence	Plaintiff #200	Gloria	Comments re beautification committee of St. Bernard. Steps that need to be taken to establish R-1 zoning and enforcement of codes.
ACIA 0448	Undated	Notes	Plaintiff #200		Aspects of St. Bernard Parish Charter; period of adjustment in the new type of operation; things that could affect operation of govt.
ACIA 0449	Undated	Meeting Notice	Plaintiff #200	All Arabi Residents	Come to meeting to stop the "ridiculous ideas listed below." Prevent dump from operating past 3/31/93 deadline.
ACIA 0450	Undated	Comments	Plaintiff #200		Page 1 of Comments re Mr. Dean's Report #42.
ACIA 0451	8/31/93	Memo	Plaintiff #190		Dump site visit on 8/31/93 from 9:05-9:40 am.
ACIA 0452-53	Undated	Memo	Plaintiff #200	All Arabi Residents	Criticizes Dean's support of extending Aycock Street into dump. Blames garbage smell, noises, traffic, dust on BFI. Requests presence at council meeting.
ACIA 0454	Undated	Public Notice	TP		Public notice for bill to be introduced in legislature for creation of Southeast Louisiana Waste Management Authority. (1993)
ACIA 0455	Undated	Letter to Editor	Non-Plaintiff #2		Criticism of Dean's position on garbage problem.
ACIA 0456-64	Undated	Comments	Plaintiff #200		Continuation of notes on St. Bernard Charter and government operations. Comparison of police jury and new council form of government.
ACIA 0468	4/22/93	Memo	Plaintiff #200		Memo re Dean's Report #45 in St. Bernard News 4/7/93. Negative comments re Dean's lack of support for BFI dump closure and for his not being a "friend of Recovery One. "

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ACIA 0469	4/7/93	Report	Dean		Report #45 in paper. "Rain & no flooding; Low-cost garbage disposal; Tourism at its best." Notes contract signed that will reduce overall cost of garbage disposal by about \$80,000 per year. Laments not being given same tipping cost as New Orleans (\$300,000 savings per year)
ACIA 0470	4/6/93	Handwritten Notes	Plaintiff #200		Handwritten calculations re landfill costs and tipping fees.
ACIA 0471-72	9/16/92	Report	Dean		Report #21: "Frugal – To Be or Not To Be." Push for renewal of half-cent sales tax to purchase trucks to cut our garbage and trash pick-up costs in half.
ACIA 0473-74	Undated	Handwritten Notes	Plaintiff #200		More calculations re tipping fees.
ACIA 0475	10/22/92	Letter to Editor	Kai Midboe	TP	"DEQ Chief on landfill settlement agreement." (Recovery I)
ACIA 0476-79	2/1/90	Correspondence and Permit	Templet	BFI	Crescent Acres Landfill permit.
ACIA 0480	1/26/93	Press Release	LDEQ	Public	"Midboe Denies Extension for Crescent Acres Landfill."
ACIA 0481-82	Undated	Correspondence	Midboe	BFI	Request for delay in closure denied: lack of liner and leachate collection in North Pond; failure to control leachate seepage; and four other reasons.
ACIA 0483	12/2/92	Correspondence	Midboe	ACIA	Acknowledges receipt of 10/27/92 information package re comments on permit modification; public hearing to be conducted.
ACIA 0484-88	Undated	Map			Crescent Acres Property Holdings and Location Map
ACIA 0489	Undated	Time Line			Plot of Dump Events from Date of Permit Application. Mentions trip by Plaintiff #251 to dump by boat with coastal man Jan 1993 (?) with water flowing over levee. Mentions council meeting 11/3/92: "Council "A" spoke first—did not help Plaintiff #251.
ACIA 0490	1/15/93	Correspondence	Breaux	Plaintiff #200	Response Breaux received from LDEQ re Crescent Acres' permit application.
ACIA 0491-92	1/11/93	Correspondence	Midboe	Breaux	Status of permit extension request. Notes 9/21/92 meeting of Plaintiff #251, STB parish officials, and rep of DEQ to explain concept of permit modification. Public hearing to be scheduled.
ACIA 0493-97	1/25/93	Correspondence	Tulane Env Clinic	ACIA & Others	Legislative Oversight Committee Hearing on DEQ's Solid Waste Regulations. Outlines proposed regulations and adverse effects caused by solid waste disposal facilities.
ACIA 0498-99	Undated	Memorandum	Plaintiff #200	Dean	Response to Parish President Report #21, Page 3, St. Bernard News. Urge support of BFI closure.
ACIA 0500-02	1/7/93	Agenda			Midboe, Odinet, Plaintiff #251, & Plaintiff #200 meeting to discuss: historical notes of Crescent Acres Inspections/Meetings; BFI Water Permit; Peggy Wilson 12/15/92 memo.
ACIA 0503	1/25/93	Newspaper Article	James Gill		TP – "Reviewing a garbage pact"
ACIA 0504	Undated	Memo	Plaintiff #200		Memo re Gill editorial of 10/14/92. Plaintiff #200 believes Gill missed the point and that BFI case against city and Recovery I is aimed at delaying court matter so that Crescent Acres dump can continue to operate during pendency of suit.
ACIA 0505	11/11/92	Report #29	Lynn Dean		President's Report. Intention to visit more garbage handling facilities so he can make the best decisions for long term solution.
ACIA 0506	11/6/92	Newspaper Article	St. Bernard Voice		"Brief Council Meeting Held Election Day." Notes Plaintiff #190 and Devine's complaints re Dean's support of BFI's operating permit until 1999 especially in his "paid columns in the St. Bernard News."
ACIA 0507-09	10/19/92	Correspondence	Plaintiff #190, Pres ACIA	Dean	Response and rebuttal to Dean's President's Report #24. Nasty response to Dean's support of BFI's permit extension.

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ACIA 05010-12	5/13/92	Correspondence	Clerk, STB Council	Norfolk RR	Council Resolution attached re placing guardrails, warning lights and/or other warning devices in residential neighborhoods.
ACIA 0513-17	2/25/92	Correspondence Attachments	Plaintiff #190	Dean & Council	Appreciation for resolution restricting future landfill sites bordering St. Bernard; asks STB President and Council to support normal closure of Crescent Acres site and to allow Recovery One to accept garbage stream after Crescent Acres closure.
ACIAS 0518-19	6/4/92	Telephone Notes	Plaintiff #190 (?)		Notes re telephone call from Plaintiff #251 re his meeting with Mayor's Committee on Solid Waste Disposal 6/3/92. Dean present and announced support of BFI permit extension.
ACIA 0520	6/4/92	Newspaper Article	Theim		"LA Urged to Reopen Landfill: Barthelemy asks DEQ to Act"
ACIA 0522-25	Undated	Response	Unsigned		Handwritten version of ACIA 0507-09. Looks like written by Plaintiff #200 for Plaintiff #190's signature.
ACIA 0526	Undated	Unknown			"Method Used to Create a Parish wide Task Force"
ACIA 0527-29	10/13/92	Correspondence	Plaintiff #190	Dean	ACIA recommendation re STB solid waste disposal needs (Mission and Implementation)
ACIA 0531	10/91	Introduction	BFI		Description of General Site Design and Existing Conditions
ACIA 0532	7/23/92	Correspondence	Plaintiff #190	Johnston	Request for support to close landfill 3/93.
ACIA 0533	12/4/92	Correspondence	Plaintiff #200	Breaux	Support for closure of dump on schedule (3/93).
ACIA 0534	11/27/92	Correspondence	Plaintiff #200	Midboe	Request for performance and compliance records for Crescent Acres 2/1/90-11/92 and 3/87-2/1/90 to prepare for campaign to close landfill as scheduled.
ACIA 0535	11/27/92	Correspondence	Landfill Committee	Tauzin	Request for support to close landfill 3/93.
ACIA 0536	11/27/92	Correspondence	Landfill Committee	Tauzin	Same as above except that copies of 7/23 and 9/23/92 letters were not sent as indicated.
ACIA 0537	9/23/92	Correspondence	Plaintiff #190	Tauzin	Request response to letter sent 7/23/92 with attached TP 9/22/92 article supporting closure because BFI operating without liner or leachate collecting system.
ACIA 0538	9/23/92	Correspondence	Plaintiff #190	Johnston	Same content as above.
ACIA 0539	9/30/92	Correspondence	Johnston	Plaintiff #190	Transmittal letter for Johnston's letter to DEQ secretary re closure of landfill.
ACIA 0540	9/30/92	Correspondence	Johnston	Midboe	Support for closure of landfill by March 1993
ACIA 0541	9/23/92	Correspondence	Plaintiff #190	Midboe	Expresses appreciation for coming to "Town Meeting" 9/9/92 and asks to be informed and invited to participate in the hearing process.
ACIA 0542	9/22/92	Newspaper Article	Turni		TP Article: "BFI is seeking to extend life of local landfill."
ACIA 0543	9/23/92	Correspondence	Plaintiff #190	Warner	Request for public hearing re BFI's request for permit extension.
ACIA 0544	9/23/92	Correspondence	Plaintiff #190	Nunez	Request for written confirmation of position supporting landfill closure.
ACIA 0545	7/23/92	Correspondence	Plaintiff #190	Johnston	Request for Johnston to write Midboe in support of landfill closure.
ACIA 0546	7/23/92	Correspondence	Plaintiff #190	Tauzin	Request for Tauzine to write Midboe in support of landfill closure.
ACIA 0547-50	11/16/92	Correspondence	Odinet	EPA, Corps	Requests protection for residents living near landfill that operates in "violation of federal and state air, water, solid waste, and wetlands laws and regulations.
ACIA 0551	Undated	Newspaper Article	AP		"Denial of Landfill Is Upheld by DEQ"
ACIA 0552	4/3/87	Affidavit	St. Bernard Voice		Public Notice that BFI intends to apply to LDEQ for permit to upgrade Crescent Acres.
ACIA 0553	10/30/92	Correspondence	Midboe	Plaintiff #190	Commitment to allow ACIA to participate in hearing process re modification of landfill permit.
ACIA 0554	10/22/92	Correspondence	Councilman Dysart	Plaintiff #190	Invitation to be present at 11/10/92 council meeting to discuss proposal for long term plan and creation of Citizen's Task Force.

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ACIA 0555	10/20/92	Correspondence	Midboe	Odinot	Acknowledgement of request for participation at public hearing re permit extension.
ACIA 0556	10/15/92	Correspondence	Miller	Plaintiff #190	Acknowledgement of request for participation at public hearing.
ACIA 0557	10/15/92	Correspondence	Miller	Plaintiff #190	Notification will be given for participation in public hearing re landfill closure.
ACIA 0559-62	11/24/92	Correspondence	Odinot	DEQ	Request for public hearing re issuance of landfill permit. With attached public notice.
ACIA 0563	9/28/92	Correspondence	Odinot	Midboe	Formal request for public hearing re extension request.
ACIA 0564-73	2/28/85	Correspondence Application/Maps	Corps of Engineers	V. Keeler & Co	Review of 1/23/85 application for sanitary landfill indicates that no permit is required for the proposed landfill operation
ACIA 0574	8/8/86	Newspaper	St. Bernard Voice		"Paris Road Garbage Dump Is Closed" with handwritten marginal notations indicating story in error.
ACIA 0575-77	1/27/92	Correspondence	Non-Plaintiff #2	Dean	Closer to landfill than Plaintiff #251 and Council "A". Well documented letter re garbage smells and garbage disposal. "Bewildered by venom displayed at council meeting to discredit Dean...suspects ulterior motives for emotional and convoluted arguments of Plaintiff #251 and Plaintiff #190.
ACIA 0578	Undated	Handwritten Note			"Not Sent -- Due to Lawsuit Considerations" Attached to Templet letter.
ACIA 0579-81	Undated	Draft Letter	Plaintiff #200 (?)	Templet	Calls for revocation of permit because application was flawed, nauseous odors and loud industrial noises plague residents.
ACIA 0582-83	Undated	Draft Letter Handwritten Notes	Plaintiff #200	Edwards	Handwritten Note: "(Not Sent) Waiting on More Signals" Calls for governor's support of landfill closure citing the fact that permit never considered people and their habitats ... only endangered species' habitat.
ACIA 0584	2/2/94	Report #94-5	Dean		St. Bernard News article indicating Orleans Parish plans to build new state-of-the-art landfill that will accept St. Bernard garbage. Arrangements being made to visit Walker landfill.
ACIA 0585	Undated	Handwritten Note	Unknown		"Olga (for Norman)"
ACIA 0586	10/7/89	Newspaper Article	Smith		TP-"Residents Vow to Close Dump Near Arabi" Notes "Lawyer Lawyer #2 held out the hope of large amounts of money and the dump's closure."
ACIA 0587	Undated	Map			Indicates site of Crescent Acres Landfill.
ACIA 0588	Undated	Picture			Looks like picture of Plaintiff #200 being sworn in.
ACIA 0589	1994-95	Title Page			ACIA with Address
ACIA 0590-91	Undated	Record			ACIA record to improve quality of life.
ACIA 0595/601 ACIA 0782-3	8/30/96	Correspondence	ACIA	Ponstein PresSTB	Arabi Drainage system and appearance before ACIA members.
ACIA 0599-600	1/2/94	Draft Newspaper Article	ACIA	St. Bernard News	Draft newspaper article, "For A Better Arabi."
ACIA 0602-03	3/6/94	Draft Newspaper Article	Plaintiff #200		"ACIA in Action -- Part 2." Outlines things that residents of Arabi should do to improve their quality of life.
ACIA 0606	5/11/94	Violations	Plaintiff #200		Code violation complaints.
ACIA 0607	Undated	Newsletter	Unsigned		Purpose of ACIA, telephone numbers for complaints, general membership meetings.
ACIA 0608	Undated	Press Release	ACIA		Notes 1995/96 officers and board members.
ACIA 0609	Undated	Handwritten Oath			Oath of office for ACIA board.

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ACIA 0610	10/9/95	Agenda			Board Meeting Agenda. Val on program; Ad in St. Bernard Voice not approved by Board.
ACIA 0611	9/13/95	Agenda			Board Meeting Agenda. Unauthorized paid ad in St. Bernard Voice. Not sanctioned by board; no response from public; no retraction as promised.
ACIA 0612-15	8/9/95	Agenda	Plaintiff #200		Board Meeting Agenda. Unauthorized paid ad in St. Bernard Voice. Discussion led by Plaintiff #251 re necessity of flyer to Arabi residents re potential danger of dump becoming active.
ACIA 0616	7/12/95	Agenda	Plaintiff #200		General Meeting Agenda. Plaintiff #251 reviews visit to dump being closed. Q/A session with Val.
ACIA 0617	7/12/95	Agenda	Plaintiff #200		Board Meeting Agenda before General Meeting. Lawyer #1 and Chris Rouselle introduced.
ACIA 0618	6/28/95	Agenda	Plaintiff #200		Emergency Meeting to discuss ad paid as of 2/23/95. Discussion as to board's actions
ACIA 0619	6/7/95	Agenda	Plaintiff #200		Board Meeting Agenda. General business matters.
ACIA 0620	5/10/95	Agenda	Plaintiff #200		Board Meeting Agenda. Report on dump from Plaintiff #251. General business.
ACIA 0621	4/25/95	Memo	Plaintiff #200	To Whom It May Concern:	Best utilization of Jackson Barracks.
ACIA 0623	4/25/95	Correspondence	Plaintiff #200	Turner, Director Public Works	Request for street repair action on Angela Street.
ACIA 0624-25	1/26/95	Correspondence	Weinstein	Plaintiff #200	Notification of conviction for indecent behavior with a juvenile.
ACIA 0626	4/12/95	Newspaper Article	Editorial Page		"Burnishing St. Bernard" Congratulatory article for St. Bernard's earning a spot in Louisiana's Cleanest City Contest.
ACIA 0627	Undated	Newspaper Article	Ragsdale/STB Bureau		"Parish Soggy But Clean"
ACIA 0628-29	4/28/95	Newspaper Article	Pictures- STB Voice		Entrances to Arabi spruced up and freshly landscaped.
ACIA 0630-31	4/12/95	Agenda	Plaintiff #200		General Meeting Agenda. General business matters. Plaintiff #251 – speaker for meeting.
ACIA 0632	3/11/95	Newspaper Article	Weiss		"Barking Response Muzzled"
ACIA 0633	2/16/95	Correspondence	Phelps	Plaintiff #200	Note of appreciation for Plaintiff #200's commendation of Ragsdale's presentation at ACIA meeting.
ACIA 0635	3/8/95	Newspaper Article	Weiss		"People to End Salary Debate. Dean: President Deserves More"
ACIA 0636	3/8/95	Agenda			Board Meeting Agenda. DEQ/BFI/Dump update by Plaintiff #251.
ACIA 0638-640	2/8/95	Correspondence Violations	Plaintiff #200	Gloria C.	Two sheets of junk problems in Arabi.
ACIA 0641-42/697-9	10/24/94	Correspondence	Plaintiff #200	Dysart	Wants littering laws made stronger and enforced. Lists 14 complaints re STB including the crepe myrtle trees in front of government complex. Real vigilante.
ACIA 0643-45	2/3/95	Correspondence	Plaintiff #200	Dysart	Handwritten letter – more "neat and clean" concerns listed by street and parish wide (includes even the "vertical plane" of traffic signs!)
ACIA 0646	2/6/95	Correspondence	Plaintiff #200	Mollere - DEQ	Thanks DEQ staff for attending ACIA meeting along with BFI personnel. Questions final disposition of solids collected in storage tanks.
ACIA 0647	2/6/95	Correspondence	Plaintiff #200	Phelps	Letter of appreciation for Ragsdale's appearance at ACIA 1/11/95 meeting.
ACIA 0648	2/17/95	Picture	St. Bernard Voice		Picture taken at 2/7/95 Council Meeting with local businesses, clubs, and service organizations. Includes Plaintiff #200 as ACIA president.
ACIA 0649	1/25/95	Newspaper Article	St. Bernard News		Notice of Informational Meeting 1/26/95 to provide description of technical aspects of closure plan modification approved for Crescent Acres on 12/29/94.

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ACIA 0649	1/26/95	Newspaper Article	TP		"Landfill Plan Is On Agenda"
ACIA 0650-51	1/26/95	Correspondence	Plaintiff #200	DEQ	Hopes for amendment to closure permit if ACIA's concerns are valid.
ACIA 0651-52 727-35	1/26/95	Notes	Plaintiff #200	DEQ	Notes and technical questions re closure of Crescent Acres Dump: security fencing; North Pond; Final Cover; Leachate. (727-35 includes requirements for facility closure and post-closure; closure implementation schedule, closure cost estimate, and operational plan for closure)
ACIA 0653	1/12/95	Newspaper Article	Turni		"Impurities To Be Filtered out of Water"
ACIA 0654	1/27/95	Newspaper Article	Turni		"Residents Stay on Top of Landfill Closure Plan." Residents upset DEQ approved cleanup plan for closed landfill without public hearing.
ACIA 0656	1/11/95	Agenda	Plaintiff #200		Plaintiff #251 and Exnicios on agenda with rest of general business.
ACIA 0657	1/9/95	Agenda	Plaintiff #200		Board Meeting. Plaintiff #251 accusation discussed at close of meeting.
ACIA 0658	12/20/94	Correspondence	Plaintiff #200	State Police	Anonymous Letter requesting State Police to check compliance for gaming apparatus at Arabi Park Food Store on Mehle Street.
ACIA 0659-67/ 710-21	12/14/94	Correspondence Revisions	Plaintiff #200	STB Council	Against reducing parish income until parish routine services are completed timely. Details services needed.
ACIA 0665	12/14/94	Agenda	Plaintiff #200		Board Meeting. General business matters and discussion of poker machines in residential neighborhood.
ACIA 0668	11/28/94	Correspondence	Plaintiff #200	Dean	Invitation to all to attend ACIA Board meeting to address junk car and trash problem.
ACIA 0673	11/7/94	Memo	Plaintiff #200	ACIA	Request to amend by-laws re months of general meetings.
ACIA 0674	7/25/94	Memo	Ragsdale – TP	Plaintiff #200	Request for information re ACIA organization.
ACIA 0675	10/11/95	Minutes	Plaintiff #200		Minutes 7/12/95 meeting. Plaintiff #251 gave update on dump closure. Exnicios asked for volunteers to testify in court, gave update on lawsuit, and made it clear that you don't have to be a member of ACIA to be in the lawsuit. Val expects case to go to court in 60-90 days. Val won half/half raffle and donated it to ACIA treasury.
ACIA 0677	10/11/95	Agenda	Plaintiff #200		Update by Val. Election and swearing in by Val.
ACIA 0684	Undated	Report	Unknown		Garbage Collection Bids
ACIA 0686-87	9/22/94	Editorial	TP		"Crescent Acres Still a Problem"
ACIA 0695-6	Undated	Roster/Newsletter			Roster of Officials/Addresses for writing purposes on back of Save Our Lake News
ACIA 0700-704	11/16/94	Membership Roster			1994/95 Paid Membership including Val. Also indicates those not renewing.
ACIA 0706-07	Undated	Flyer			Political Flyer paid for by Tinsley Sammons. "Rid government of lawyers."
ACIA 0708-09	Undated	Picture			Newspaper Clipping re new uninterrupted sidewalk.
ACIA 0722-25	Undated	Public Notice			Public Hearing Notice for Litter Control and Enforcement.
ACIA 0736-7	Undated	Newspaper			Public Hearing Notice checked re portion of The George Tract; Back Page consists of STB Parish combined statement of revenues, expenditures, and changes in fund balances for year ending 12/31/93.
ACIA 0738-9	10/14/94	Newspaper			Two Public Hearing Notices checked re resubdivision of lots. Back Page consists of STB Parish combined balance sheet, 12/31/93.
ACIA 0740-741	8/18/94	Ordinance			Ordinance re Parking for Certain Purposes Prohibited.
ACIA 0744	Undated	Transmittal Page	Plaintiff #200		Transmittal page for three year capital improvement plan noting "No drainage improvements on Aycock and Esteban.

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ACIA 0745-50	5/1/95	Correspondence Plan	Council "A"	Plaintiff #200	Three year capital improvement plan attached to letter promising request for priority status on Angela Street. Original letter from Plaintiff #200 to Turner attached requesting help with Angela Street
ACIA 0751	10/24/95	Memo	Harvey-Reg Planning	Plaintiff #200	Notification of Public Listening Session 11/7/95 re the effectiveness of New Orleans region's transportation planning process.
ACIA 0752-53	11/8/95	Notice	DEQ	Plaintiff #251	Declaration of Emergency since recent events indicate accidental releases involving toxic, flammable or explosive substances needs immediate attention.
ACIA 0755	Undated	Notice	DEQ		Public Hearing Notice 11/16/95 to consider solid waste permit application submitted by River Birch, Inc. for solid waste site intersection of S. Kenner Rd and Hwy 90.
ACIA 0757-58	3/10/91	Correspondence	Tauzin	Plaintiff #200	Federal efforts to encourage recycling.
ACIA 0759	7/9/92	Correspondence	Odinet	Midboe	LA Legislative support for closure of landfill 3/31/93.
ACIA 0761	6/1/92	Correspondence	Plaintiff #190	Midboe	ACIA requests immediate notification of any BFI request for changes to existing dump permit.
ACIA 0762	9/30/90	Correspondence	Johnston	Templet	Request for complete status report re BFI (particularly methane and hydrogen sulfide odor control, any health studies, and basic facility operations).
ACIA 0763-64	12/4/92	Notice	DEQ	Plaintiff #200	Notice of Substantive Changes to SW05 (changes to the Solid Waste Regulations).
ACIA 0765-67	1/8/93	Notice	DEQ	Plaintiff #200	Notice of Intent to establish procedures for processing and review of permit applications; Fiscal and Economic Impact Statement for Administrative Rules.
ACIA 0768	11/30/90	Correspondence	Johnston	Templet	No response received to his inquiry of 9/30/90; request for reply on status.
ACIA 0769-74	5/21/91	Correspondence Report	Trachtman	Plaintiff #251	Summary of OPH involvement with Crescent Acres Landfill prepared by Lanier.
ACIA 0775-76	4/20/96	Correspondence	Plaintiff #200	STB Pres/Council	Drainage problem (Aycok, Esteban, Mehle, Patricia). Request for timetable for problem solution re drainage; prepare to mount media blitz and/or appeals to state and federal elected officials.
ACIA 0777	6/20/96	Correspondence	Plaintiff #251	STB President	Request for meeting <i>before</i> general membership meeting to discuss capital improvements scheduled for area drainage problems.
ACIA 0778	2/3/94	Correspondence	Plaintiff #251, Plaintiff #200	Emmer-DEQ	Cannot support pending permit because no plans to coordinate functions of LDEQ's water and solid waste divisions re dump closure have been implemented.
ACIA 0780	8/16/96	Correspondence	Plaintiff #251	Dysart	Request for night-time meeting to consider rezoning dockets #8-96 and #11-96 so that ACIA members might be able to attend.
ACIA 0781/875	12/3/96	Correspondence	Plaintiff #251	Odinet	Letter of appreciation for plans to acquire state funding/capital outlay for St. Bernard Projects (drainage, roads, museum project).
ACIA 0784	12/28/96	Correspondence	Plaintiff #251	Dysart	Amendment to STB Parish Code of Ordinances "unsettling and alarming" re proposal that government land be exempt from strict enforcement of Chapter 22 of STB Code.
ACIA 0785	1/7/97	Questions	Plaintiff #251		Questions re Ordinance 1424 and exemption of parish government from local ordinances.
ACIA 0786	4/23/90	Correspondence	Tauzin	Templet	Protest of issuance of permit and request to reopen matter for public comment.
ACIA 0787	2/14/90	Correspondence	Plaintiff #200	Tauzin	Request for help re "real environmental problem" posed by landfill in such close proximity to area residents.
ACIA 0788	2/14/90	Correspondence	Plaintiff #200	Johnston	Request for help and meeting with Johnston's office re problems posed by landfill.

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ACIA 0789	4/14/93	Agenda			STB Parish Administrative Code Committee meeting. Plaintiff #200 addressed group re junk on private property and parking of certain vehicles in residential area.
ACIA 0790-863		Violations			Code Violations listed by Address
ACIA 0865	9/27/95	Correspondence	Odinet	Norfolk Southern	Seeking assistance to remedy problem of excessive whistle blowing and rail changing at all hours of the night at STB Hwy and W. Judge Perez Drive crossing.
ACIA 0866	Undated	Code	Sec 20-144/144.1		Copy of code article and handwritten notes re section pertaining to how high grass or weeds can be.
ACIA 0867	Undated	Code	Sec 11-28		Copy of article re junk on private property. Handwritten notes calling for a parish code compliance committee to inspect and report violations every quarter.
ACIA 0868	5/96	Certificate			Certificate presented to ACIA for services rendered 1996 STB Club Directory.
ACIA 0869	4/26/96	Correspondence			Parish wide cleanup 5/9/96 to make STB cleanest parish in state.
ACIA 0870	5/21/96	Correspondence	Bonnette, Nunez	Club President	Thanks for support of St. Bernard Parish 1996 Club Directory.
ACIA 0871	8/16/96	Correspondence	Plaintiff #251	LeBlanc	Thanks for presentation on termites at club meeting.
ACIA 0872	6/3/97	Correspondence			Thanks for support and contribution to Project Graduation IV.
ACIA 0873	1/7/97	Correspondence	Anderson	Plaintiff #200	Request for permission to make Entergy presentation to ACIA.
ACIA 0874	Undated	Form Sheet			Form Sheet to document recent drainage problems. Includes name, address, and location of problem.
ACIA 0877	Undated	Fact Sheet			Neighborhood Watch Fact Sheet
ACIA 0878-881	Undated	Draft Article	Plaintiff #200		"35 Ways to Make Arabi Beautiful"
ACIA 0882	6/18/93	Public Notice Newsletter	Plaintiff #200		Public Hearing Notice re change in zoning for the United Gas Pipeline property from R-1 to C-1. Request for attendance at public hearing and to join ACIA.
ACIA 0883	Undated	List	Plaintiff #200		Code Violation List with addresses
ACIA 0890-95	Undated	Promotional Material	Mobil		"Plastics and the environment: Degradability-Recycling-Incineration-CFCs"
ACIA 0889	5/16/94	Memorandum	Plaintiff #200		Status request of ACIA complaints listed.
ACIA 0885	6/23/93	Memorandum			Status request of ACIA complaints listed.
ACIA 0888	Undated	Form	Plaintiff #200		Blank form for reporting code violations.

34TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. BERNARD
STATE OF LOUISIANA

NO. (63-145)
C/W
65-733

DIVISION "D"

JEANETTE PALMER, ET AL.

VERSUS

BROWNING FERRIS, INC., ET AL.

FILED: April 17, 1998 158 Elizabeth Ring
 28:44 PM DEPUTY CLERK

The petition of Jeanette Palmer, wife of/and John Palmer,
domiciled in the Parish of St. Bernard, State of Louisiana, with
respect represents:

I.

Plaintiffs in this cause of action are:

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II.

Defendants in this cause of action are:

1. BFI Waste Systems of North America, Inc., a Delaware corporation authorized to do and doing business in this Parish and State, and its predecessors in interest.
2. Browning Ferris Industries of Louisiana, a domestic corporation authorized to do and doing business in this Parish and State, and its successors in interest.
3. Browning Ferris, Inc., a Texas corporation authorized to do and doing business in this Parish and State, and its successors in interest.
4. Browning Ferris Industries, Inc., a Delaware corporation authorized to do and doing business in this Parish and State.
5. CECOS International, Inc., a New York corporation authorized to do and doing business in this Parish and State.
6. The Sewerage and Water Board of New Orleans, a political subdivision of the City of New Orleans, authorized to sue and be sued.
7. The State of Louisiana, Department of Environmental Quality, authorized to sue and be sued.

III.

Defendants are jointly and severally indebted unto your petitioners in a full sum reasonable in the premises, and additionally for punitive damages reasonable in the premises, together with legal interest, and for all costs, for this, to-wit:

IV.

BFI Waste Systems of North America, Inc., is the successor in interest of both Browning Ferris, Inc., the owner of, and Browning Ferris Industries of Louisiana, the operator of, a facility known as Crescent Acres Landfill. Browning Ferris Industries, Inc., is the parent corporation of the three aforementioned entities. Employees of CECOS International, Inc., were integrally involved in the daily operation of Crescent Acres Landfill. Said facility is located in close proximity to, and/or adjacent to, the residential and/or commercial property of your petitioners. Said facility, and/or the East Bank Sewerage Treatment Plant of defendant Sewerage and Water Board of New Orleans, also located in close proximity to, and/or adjacent to, the residential and/or commercial property of your petitioners, emits foul odors, particulates, and other hazardous substances into and on to the property of your petitioners. Said odors, particulates and substances deprive your petitioners of the liberty of enjoying their property, decrease the value of your petitioners' property, and cause your petitioners to suffer personal injuries while on their property.

V.

Defendant, State of Louisiana, Department of Environmental Quality, is the governmental entity exercising jurisdiction over the Louisiana environment and specifically over the operations of defendants BFI Waste Systems of North America, Inc., Browning Ferris Industries of Louisiana, Browning Ferris Industries, Inc., Browning Ferris, Inc., CECOS International, Inc., and Sewerage and Water Board of New Orleans, and said Louisiana Department of Environmental Quality negligently permitted said facilities to operate in a manner causing damage unto your petitioners.

VI.

The proximate cause of the aforementioned damages of your petitioners were the strict liability and/or negligent acts of defendants BFI Waste Systems of North America, Inc., Browning Ferris Industries of Louisiana, Browning Ferris Industries, Inc., Browning Ferris, Inc., CECOS International, Inc., Sewerage and Water Board of New Orleans, and State of Louisiana, Department of Environmental Quality, which consist particularly, but not exclusively, of the following:

STRICT LIABILITY AND/OR NEGLIGENT ACTS OF BFI WASTE SYSTEMS OF NORTH AMERICA, INC., BROWNING FERRIS INDUSTRIES OF LOUISIANA, BROWNING FERRIS INDUSTRIES, INC., BROWNING FERRIS, INC., AND CECOS INTERNATIONAL, INC.:

1. Discharge of noxious odors into the atmosphere.
2. Failure to properly cover each day's garbage with the required fill.
3. Dumping garbage into standing water.
4. Allowing contaminants to run-off and leache into the soil and ground water of the surrounding properties and water bodies.
5. Improper handling of infectious hospital waste.
6. Improper handling of infectious asbestosis waste.
7. Failure to maintain ground water monitoring wells that ring the landfill.
8. Failure to control insects, rats, and birds at the landfill.
9. Failure to properly inspect the waste being deposited in the landfill so as to insure hazardous waste is not likewise deposited.
10. Failure to dump garbage into the smallest particle area at the landfill.
11. Failure to maintain a liner or double liner with or without a leachate collection and removal system so as to prevent the migration of waste water out of the landfill and into the soil, ground water, or surface water.
12. Failure to maintain run-on, run-off, and wind dispersal

controls.

13. Public and private nuisance and/or trespass.

14. Interference with the use and enjoyment of neighboring properties.

15. All other acts of negligence which may be proved at the trial of this matter.

STRICT LIABILITY AND/OR NEGLIGENT ACTS OF SEWERAGE AND WATER BOARD OF NEW ORLEANS:

1. Discharge of noxious odors into the atmosphere.

2. Failure to continuously inspect, monitor, and record the combustion temperature, the waste feed composition, and rate, the indicator of combustion gas velocity, and the discharge concentration, downstream of the combustion zone and prior to release to the atmosphere.

3. Failure to achieve an acceptable destruction and removal efficiency for each principal organic hazardous constituent.

4. Public and private nuisance and/or trespass.

5. Allowing unacceptable variations in the incineration system operating procedures.

6. Interference with the use of, and enjoyment of neighboring properties.

7. All other acts of negligence which may be proven at the trial of this matter.

NEGLIGENT ACTS OF STATE OF LOUISIANA, DEPARTMENT OF ENVIRONMENTAL QUALITY:

1. Permitting the aforescribed Strict Liability and/or Negligent Acts of defendants Browning Ferris, Inc., Browning Ferris Industries of Louisiana, Browning Ferris Industries, Inc., BFI Waste Systems of North America, Inc., and Sewerage and Water Board of New Orleans.

2. Permitting defendants Browning Ferris, Inc., and Browning Ferris of Louisiana, Browning Ferris Industries, Inc., and BFI Waste Systems of North America, Inc., to operate Crescent Acres Landfill beyond the 180 day interim permit originally granted.

3. Failure to conduct an environmental impact study before

permitting the operation of Crescent Acres Landfill.

4. Failure to conduct an epidemiological impact study before permitting the operation of Crescent Acres Landfill.

5. All other acts of negligence which may be proven at the trial of this matter.

VII.

Petitioners specifically request that the public and private nuisance created by defendants be abated or closed and ceased. Petitioners specifically request that this Honorable Court order that defendants BFI Waste Systems of North America, Inc., Browning Ferris Industries of Louisiana, Browning Ferris Industries, Inc., Browning Ferris, Inc., CECOS International, Inc., and Sewerage and Water Board of New Orleans, either abate the public and private nuisance created by them by forcing said defendants to either operate their facilities in such a manner so as to have no adverse impact upon your petitioners, or their property, or force the closure of said facilities if such can not be accomplished, and force the removal and proper disposal of any and all hazardous substances that do and/or could pose a threat to their person or property in the future.

VIII.

In accordance with LSA-CCP Article 1572, petitioners request the Court give written notice by certified mail, at least ten days in advance of the date fixed for trial or hearing of the case, whether on exceptions, motions, rules, or the merits. Petitioners also request immediate notice of all orders or judgments, whether interlocutory or final, made or rendered in this case upon the rendition thereof, as provided by LSA-CCP Articles 1913 and 1914, including notice of judgment, in the event this case be taken under advisement, or if the judgment is not signed, at the conclusion of the trial.

IX.

Petitioners request trial by jury.

WHEREFORE, petitioners pray that a copy of this petition be served on each defendant, that each be cited to appear and answer same, and that, after due proceedings had, there be judgment

rendered in favor of petitioners, and against defendants jointly and severally in a sum reasonable in the premises, and additionally for punitive damages reasonable in the premises, together with legal interest, for all costs of these proceedings, and for all general and equitable relief, including abatement or total cessation of the nuisance created by the defendants.

Petitioners further pray that in accordance with LSA-CCP Article 1572, the Court give written notice by certified mail, at least ten days in advance of the date fixed for trial or hearing of the case, whether on exception, motions, rules, or the merits. Petitioners also request immediate notice of all orders or judgment, whether interlocutory or final, made or rendered in this case upon the rendition thereof as provide by LSA-CCP Articles 1913 and 1914, including notice of judgment, in the event this case be taken under advisement, or if the judgment is not signed at the conclusion of the trial.

: Petitioners further pray for trial by jury.

PLEASE SERVE:

BFI Waste Systems of North America, Inc.,
through its attorney of record
Thomas Nosewicz
201 St. Charles Ave. 50th Floor
New Orleans, LA 70170

Browning Ferris Industries of Louisiana, Inc.
through its attorney of record
Thomas Nosewicz

201 St. Charles Ave. 50th Floor
New Orleans, LA 70170

Browning Ferris Industries, Inc.,
through its agent for service of process
C.T. Corporation System
811 Dallas Ave.
Houston, TX 77079

CECOS International, Inc.
through its agent for service of process
C.T. Corporation System
8550 United Plaza Blvd.
Baton Rouge, Louisiana 70809

Sewerage and Water Board of New Orleans
through its attorney of record
Raul Bencomo
639 Loyola Ave.
New Orleans, Louisiana 70113

State of Louisiana,
Department of Environmental Quality
through its attorney of record
Carl Schumacher
1106 Arabella
New Orleans, Louisiana 70115

Lawyer #1

June 14, 1999

BFI Defense Counsel

Defense Counsel #1

RE: Palmer v. BFI

Dear BFI Defense Counsel and Defense Counsel #1

Enclosed please find claim forms for two plaintiffs and family
They are still currently married, but undergoing divorce procedures),
(I only need to have plaintiff notarized, his info is complete),
plaintiff has
advanced Alzheimer's and is institutionalized), and executed by her daughter,
(I am going to prepare a substitution).

I am going to interview plaintiff tonight. She will also provide information for
her deceased mother, . The form for plaintiffs Sr. and Jr. is complete, it only
needs to be notarized (not home on Sunday unfortunately - have you been to Meraux lately?, it's
really grown). file is complete, but needs notarization. His daughter wouldn't
let me see him Sunday. I believe that he is very ill with cancer. She said it was a "bad day" and
to try back during the week; I will. is deceased) is deciding if she wants
to proceed and is supposed to get back to us this week.

It's OK to move to dismiss list of plaintiffs.

We have sent certified letters to plaintiffs
The only response to
date was from daughter who said she would check with her mother and get
back to me. That was last week. I believe that this covers everyone on your list.

Lawyer #5

Appendix 14.

Lawyer #1

June 18, 1999

Defense Counsel #1

RE: Palmer v. BFI

Dear BFI Defense Counsel and Defense Counsel #1

Enclosed please find the Acknowledgment for the claim form of _____ You received his form on the 15th. Also enclosed is the forms for _____ is in Alabama and is expected back next week. As I stated, his form is complete, but needs notarization. I will ask that you be patient a bit longer with getting Mr. _____'s form. _____ was still unavailable for me to meet with. He also only needs notarization.

_____ plaintiff informed me that she no longer wishes to proceed, so she and her deceased husband _____ can be included in your dismissal. As to the people to whom I sent certified letters, I still have not heard back from them. What say we give them a bit more time to respond?

Oh, by the way, I have located _____ plaintiffs _____ who were previously dismissed. I don't suppose you would consider arranging something to allow them back into the case? Have I mentioned lately how handsome you guys are? Smart too.

Thank you for your continuing courtesies.

Sincerely,

Lawyer #5

Appendix 14.

BFI Defense Counsel

2.

May 25, 1999

BY CERTIFIED MAIL

Lawyer #1

RE: Jeanette Palmer, et al. v. Browning Ferris, Inc., et al.
Consolidated with:
Jacklyn B. Aguilar, et al. v. Browning Ferris, Inc., et al.
Our File No. 91097-00 / 0320

Dear Lawyer #1

Several claim forms are outstanding, all of which are noted on the attached page.

Will advised back in December that he was trying to get these people to respond, however, he needed more time. Since six months has passed, I believe that it is time to determine if these people are actually plaintiffs. Accordingly, if we do not have anything from the individuals in question by June 15, 1999, I will file a motion to dismiss.

With kindest regards, I remain

Very truly yours,

BFI Defense Counsel

Appendix 15.

MEMORANDUM

Date: 6/11/98

To: Defense Counsel #1

From: SWB General Counsel

RE: Palmer, et al vs. BFI, et al; c/w Aguilar, et al vs. BFI, et al

The time is 3:05 p.m. I have just gotten off the phone with Lawyer #3. An issue arose as to the discovery process taking place at SWB environmental office today. Lawyer #4 and the environmental expert are making notes of records reviewed. Once this information was conveyed to me, I spoke with Lawyer #4 and asked that he not make notes of any documents being reviewed but merely flag same for copying at a later date. He indicated that he would call Lawyer #3 to discuss the problem. Thereafter, Lawyer #3 called.

Without reiterating the entire conversation, Lawyer #3 lectured me on the nature and extent of the discovery process, the provisions of the Louisiana Code of Civil Procedure, his relationship with the mayor, his concern that the Sewerage and Water Board was interfering with the lawful production of discovery, abuse of the discovery process, past sanctions rendered in the amount of \$5,000.00 pending possible sanctions, future possible sanctions, and impending sanctions.

Appendix 16.

I have contacted your office on two occasions and asked your receptionist to have either you or Defense Counsel #2 call me to resolve the question. Lawyer #3 proposed to contact the judge and have a telephone conference today. He indicated that you are unavailable, Defense Counsel #2 unavailable, and I told him that after this telephone conversation, I was unavailable. I further advised that his options at this point were as follows:

- 1) Continue to flag the documents that they want to have copied and make no hand written notes whatsoever, or;
- 2) Suspend the discovery process, until a later date, pending clarification and resolution of the issue between counsel.

Lawyer #3 was not satisfied with this suggestion and I told him as far as I was concerned I had nothing further to say. My position is firm and unbending.

With kindest regards, I am,

Sincerely yours,

GENERAL COUNSEL

Defense Counsel #1

July 31, 1998

VIA FAX NO.
AND U.S. MAIL

Re: Jeanette Palmer, et. al. v.
Browning Ferris, Inc., et. al.
CDC Case No.: 63-145, Division "D"
c/w Jacklyn B. Aguilar, et. al v.
Browning Ferris, Inc., et al.
CDC Case No.: 65-773, Division "C"
Our File No. SWB-100

Dear Lawyer #4

I have received your letter of July 29, 1998 regarding the document production at the Environmental Affairs Office.

Our paralegal at the site, Claire Simno, advises us that there was no "review" of sample documents from each location, so there is no waiver of any objections pursuant to any such review. "

However, as regards the customer files, which are the file cabinets in the middle of the room, we do not object to production of those records, but production will require a confidentiality agreement because of the privacy expectation of each of the customers. Most of the record in the customer files is not public information.

Alternatively, we suggest production of the EPA pre-treatment form completed by each of the commercial and industrial customers. I suspect this is the information that you were seeking. This would substantially limit the amount of documents for review and copying.

Please let me know your wishes. If you want to review and copy the entirety of the customer files, we must enter into a confidentiality agreement similar to the agreement on the production of the

Appendix 17.

Defense Counsel #2

VITA

Claire DiRosa Simno received a Bachelor of Arts degree, cum laude, from Loyola University New Orleans in 1971 after completing a three year program. She received a Master of Science degree in Urban Studies from the University of New Orleans in 1988. She is married to a local trial attorney, George R. Simno, III, and together, they completed the Ph.D. program in Urban Studies at the University of New Orleans. She and George have two sons, Renny and Jeffrey.

Claire is active in the community, serving on the board of directors and as an officer of many civic, charitable, and church related organizations. Over the years Claire has owned a convention planning business and a local gift basket business. She established Urban and Public Affairs Research group to utilize her research skills in the private and public sector, and, with her husband, operates a small real estate sales, rental, and management company, doing their small share in rebuilding New Orleans.

Claire was awarded the Order of St. Louis IX Medallion by the Archdiocese of New Orleans for her contributions of time and talent to the work of the Catholic Church in New Orleans. In 2005, she and her husband George were both awarded the Adjutor Hominum Award from Loyola University. This prestigious award honors outstanding alumni who exemplify moral character, service to humanity, and unquestionable integrity.