

Hon. Judith E. Levy

Mag. Mona K. Majzoub

No. 5:17-cv-13890-JEL-MKM

Anderson, et al.,

Plaintiffs

v.

City of Flint, Michigan, et al.,

Defendants.

**OBJECTIONS OF DR. LAWRENCE A. REYNOLDS, M.D., FAAP
REGARDING THE PROPOSED FLINT WATER SETTLEMENT
AGREEMENT**

Pursuant to the Revised Settlement Agreement, ECF 1394-2, PageID.54184, Article XX – Objections, filed with this Court on January 15, 2021, the following are my “. . . written objections why ... (I) believe the Settlement Agreement, as currently proposed, for the sections discussed in this objection only, should not be approved...” by this Court:

Professionalism, my qualifications and experience, include:

I am a graduate of Howard University School of Medicine (1979);

I am a Board Certified Pediatrician, certified by the American Board of Pediatrics;²

I practiced pediatric medicine for nearly 40 years, retiring from clinical practice 4 years ago to assist in a broader community health focus;

I am the former President and Chief Executive Officer of Mott Children's Health Center³ in Flint, Michigan;

¹ Objection Exhibit 1 - Complete Curriculum Vitae of Dr. Lawrence A. Reynolds, MD, FAAC.

² Founded in 1933, the American Board of Pediatrics (ABP) is one of the 24 certifying boards of the American Board of Medical Specialties (ABMS). The ABP is an independent, nonprofit organization whose certificate is recognized throughout the world as a credential certifying a high level of physician competence. Objection Exhibit 2 – The American Board of Pediatrics, History of the ABP.

³ A brief description from the web site: Mott Children's Health Center was founded nearly 80 years ago with a *focus on children's health*. Today, we have the same focus – the overall health and well-being of our community's children. For us, *patient care comes first*. No eligible child will be turned away. To do this, we are guided by our core values.

We deliver quality, reliable medical, dental and behavioral services based on each child's needs – from basic to specialty care. Our team also *advocates* for children's health and provides *health education and prevention programs* within the Genesee County community. It's true, children's health and well-being is our mission.

I was appointed by Governor Rick Snyder as a member of the 2015 Flint Water Advisory Task Force (FWATF)⁴, the 2016 Flint Water Interagency Coordinating Committee⁵, and the 2017 Environmental Justice Work Group (EJWG)⁶;

I am currently an At-Large Board Member of the Greater Flint Health Coalition⁷;

I am the former President of the Genesee County Medical Society;

⁴ The FWATF—composed of five members with experience and backgrounds in public policy, public utilities, environmental protection, public health, and health care—was appointed by Governor Rick Snyder on October 21, 2015. We were charged with conducting an independent review of the contamination of the Flint water supply: what happened, why it occurred, and what is needed to prevent a reoccurrence in Flint or elsewhere in the state. Objection Exhibit 3, Flint Water Advisory Task Force, Final Report, March 21, 2016.

⁵ The Flint Water Interagency Coordinating Committee, was created by Executive Order 2016-1, January 11, 2016. Objection Exhibit 4.

⁶ An excerpt from the Executive Summary of the 2018 report from the Environmental Justice Work Group (EJWG) defined our work as “The EJWG was charged “to develop and provide recommendations to the Governor that improve environmental justice awareness and engagement in state and local agencies. The EJWG will examine policy and recommend for implementation environmental justice guidance, training, curriculum, and policy that further increases quality of life for all Michiganders.” Objection Exhibit 5.

⁷ A brief description from their web site of the Greater Flint Health Coalition:

Mission - Improve the health status of our residents. Improve the quality and cost effectiveness of the health care system in our community.

Vision - A healthy Genesee County community practicing healthy lifestyles with access to the best and most cost-effective health and medical care.

Hamilton Family Health Center, now known as the Hamilton Community Health Network;

I am currently the Health Advisor to the Mayor of the City of Flint, responsible for coordinating with the Genesee County Health Department and the Genesee County Emergency Operations Center regarding the response to the Covid-19 crisis in Genesee County;

Since 2015, I have been involved with the lead crisis in Flint, the Legionnaires' crisis in Flint, the Hepatitis-A outbreak in Genesee County, and now the Covid-19 crisis in Genesee County;

In 2015, on behalf of the Greater Flint Health Coalition, I was a member of a group of community organizations, non-profits, and physicians, that approached the Flint area state-level elected officials and requested their assistance in contacting Genesee County officials to ensure that a public health emergency was declared in Flint regarding the contamination of the water in Flint;

⁸ A brief description from their website: The Michigan Chapter of the American Academy of Pediatrics is committed to improving the physical, mental and social health of Michigan's infants, children, adolescents and young adults; partnering with pediatric providers, parents and communities; and supporting members by increasing their engagement, education, and expertise.

in my involvement with the Flint water crisis I have been in regular discussions with local, state, and national leaders in public health, pediatric medicine, several types of engineers, and metallurgists.

Pursuant to Article XX – Objections, Section 20.1, my written statement of objection follows:

ALL OF MY OBJECTIONS BEGIN WITH THE SAME PREMISE:

FOR MORE THAN A YEAR THE STATE OF MICHIGAN OFFICIALS TOLD RESIDENTS OF FLINT THERE WAS NOTHING WRONG WITH THEIR DRINKING WATER.

I. OBJECTION TO BONE LEAD TESTING

My First Objection is that the use of Bone Lead testing results in Settlement Categories 1⁹, 2, 3, 4, 8, 9, 10, 11, 15, 16, 17, and 18, regarding children, and

⁹ The specific language, quoted from Settlement Category 1 regarding children under the age of six (6) at the time of their first exposure to Flint Water, ECF 1319-2, Exhibit B, PageID.40791 provides:

Bone Lead Test: Test with an X-Ray fluorescence (XRF) device optimized to measure bone lead in vivo in humans and to perform measurements of in vivo bone lead in bones. Test must have been taken between May 16, 2014, and 90 days after the date of the Preliminary Approval Order, except that the end date of 90 days after the date of the Preliminary Approval Order shall not be applied to Future Minor Claimants, who shall not be subject to that end date restriction. XRF bone test results must be signed and verified as properly calibrated, reliable and accurate by a board-certified PhD and/or M.D. qualified to do so in the appropriate fields of study.

For the remaining categories, 2, 3, 4, 8, 9, 10, 11, 15, 16, 17, and 18, regarding children and 22, 23 and 25, regarding adults, the required proofs are described as: Blood or Bone tests: as described in required proofs for Category 1.

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