

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ALABAMA**

AMERICA'S FRONTLINE DOCTORS, et al.,)
))
Plaintiffs,)
))
vs.)
))
XAVIER BECERRA, Secretary of the U.S.)
Department of Health and Human Services, et al.,)
))
Defendants.)
_____)

**DECLARATION OF
RICHARD URSO, MD**

Civil Action No.
2:21-cv-00702-CLM

DECLARATION OF RICHARD URSO, MD

Pursuant to 28 U.S.C. §1746, I, Richard Urso, MD, declare under the penalty of perjury of the laws of the United States of America, and state upon personal knowledge that:

1. I am an adult of sound mind and make this statement voluntarily, based upon my personal knowledge, education, facts or data, and experience, and under penalty of perjury of the laws of the United States of America.
2. I am competent to testify as a medical expert to the facts and matters set forth herein. The facts and matters set forth herein are the types of facts and matters medical experts rely upon to reach expert conclusions. A true and accurate copy of my curriculum vitae is attached hereto as **Exhibit A**.
3. After receiving a bachelor's degree from University of Connecticut, I completed my medical degree at University of Texas Medical School at Houston. I went on to complete my internship at Parkland Memorial Hospital in Dallas, Texas, my residency at University of Texas

Southwestern in Dallas, Texas, and a fellowship at University of Texas Medical Branch in Galveston, Texas. I am board certified by the American Board of Ophthalmology. I currently practice medicine in the State of Texas.

4. I am working on this case Pro Bono.

5. I have treated over 300,000 patients in my career, including over 450 COVID recovered patients. COVID recovered patients are at extremely high risk to a vaccine. They retain an antigenic fingerprint of natural infection in their tissues. They have all the requisite components of immune memory. Vaccination may activate a hyperimmune response leading to a significant tissue injury and possibly death.

6. I have read the Complaint and Motion for Preliminary Injunction in the above captioned matter, specifically the allegations related to the dangers to members of the population who have already had Covid-19. I agree with the allegations contained in the Complaint and Motion for Preliminary Injunction.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 15, 2021.



Richard Urso MD (Jul 15, 2021 13:39 CDT)
Richard Urso, MD

Urso, Richard MD - Declaration Alabama

Final Audit Report

2021-07-15

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RICHARD G. URSO, M.D.

539 S. 3rd Street, Bellaire, Texas 77401

Cell: 832.216.6449 | Richardursomd@yahoo.com

PROFESSIONAL POSITION

Ophthalmologist

4/05 – Present

Anterior Skull Base Team

Houston Eye Associates

2855 Gramercy Street

Houston, Texas 77025

Ophthalmologist

10/93 – 04/05

Trauma & Stroke Team

Anterior Skull Base Team

Craniofacial Team

Hermann Eye Center

6411 Fannin Street 7th Floor

Houston, Texas 77025

EDUCATION

B.A., University of Connecticut, 1982

M.D., University of Texas Medical School at Houston, 1988

Internship, Parkland Memorial Hospital, Dallas, Texas

06/88 – 07/89

Residency, University of Texas Southwestern, Dallas, Texas

06/88 – 07/89

Chief Resident, 1992

Fellowship, University of Texas Medical Branch, Galveston, Texas

06/92 – 07/93

BOARD CERTIFICATION

American Board of Ophthalmology

MEDICAL LICENSURE

Texas H6671

HONORS & AWARDS

America's Top Ophthalmologists, Houston, Texas, 2005 - 2020

Dedication & Service Award, Harris County Fraternal Order of Police, 2004

Hero Award, Memorial Hermann Healthcare System, 2001

Marvin Zindler's Angel, 1999, 2001

Outstanding Teacher, University of Texas Medical School, 1998, 2000, 2002

Alpha Omega Alpha Highest Honors, University of Texas Medical School, 1988

Top Student Medicine & Surgery, University of Texas Medical School, 1986, 1987

PREVIOUS PROFESSIONAL APPOINTMENTS

Clinical Professor Department of Ophthalmology & Visual Science University of Texas Medical School at Houston Houston, Texas 77025	10/93 – 04/05
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Clinical Professor Department of Head & Neck Surgery MD Anderson Cancer Center Houston, Texas 77025	10/93 – 04/05
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TEACHING EXPERIENCE

Clinical Professor, University of Texas Medical School, 1993 - 2005

- Oculoplastics
- Orbital Anatomy
- Ophthalmic Emergencies & Ocular Trauma
- Examination of the Eye & Ocular Adnexa

Clinical Professor, MD Anderson Cancer Center, 1993 - 2005

- Ocular Oncology
- Orbital Anatomy

GRADUATE STUDENTS/POSTDOCTORAL FELLOWS

Luca Longhini
Natalia Konstantinova
Sherif Khalil
Andrew Dieu

COMMITTEE MEMBERSHIPS

Executive Committee, Houston Eye Associates, 2020 -
Overhead & Compensation, Houston Eye Associates, 2020 -
Real Estate, Houston Eye Associates, 2020 -
Recruitment, Houston Eye Associates, 2005 – 2015

PROFESSIONAL & SOCIETY MEMBERSHIPS

Alpha Omega Alpha Honor Society
American Academy of Ophthalmology
American Medical Association
Harris County Medical Society
Texas Medical Association
Texas Ophthalmic Association

CLINICAL PRACTICE, INTERESTS, & ACCOMPLISHMENTS

U.S. Patent Holder - NGF
Inventor of Oxervate

BIBLIOGRAPHY

Publications – Abstracts

1. **Urso RG**, Sanborn O, Meyer N, Anand R: Effect of Cataract Extraction on Non-Proliferative Diabetic Retinopathy. ARVO 1992 May
2. Haas E, Konstantinova N, **Urso RG**, Ruiz RS: The Effect of Mitomycin C on the Proliferation of Fibroblasts Derived from Human Keloid. European Tissue Repair Society, Padova, Italy, 1995 September
3. **Urso RG**: Topical Mitomycin C Combined with Surgical Resection for the Treatment of Keloids. European Tissue Repair Society, Padova, Italy, 1995 September

4. Konstantinova N, **Urso RG**, Ruiz RS: Development of Keloid Scar Equivalent Model and the Effects of Brief Exposure to Mitomycin C. European Tissue Repair Society, Padova, Italy, 1995 September
 5. Kountakis SE, Maillard AJ, **Urso RG**, Stiernberg CM: Endoscopic Approach to Traumatic Visual Loss. American Academy of Otolaryngology – Head & Neck Surgery, Inc., New Orleans, LA. 1995 September
 6. Konstantinova N, Lemak NA, Duong DT, Chuang A, **Urso RG**, Duvic M: Artificial Skin Equivalent Differentiation Depends on Fibroblast Donor Site: Use of Eyelid Fibroblasts, 2nd Joint Meeting of the Wound Healing Society and European Tissue Repair Society, Boston, MA, 1996 May
 7. Konstantinova N, **Urso RG**, Duong M, Ruiz RS, Duvic M: IL-8 is a Key Cytokine for Epidermal Regeneration, 2nd Joint Meeting of the Wound Healing Society and European Tissue Repair Society, Boston, MA, 1996 May
 8. **Urso RG**, Konstantinova N: Role of NGF in Keloid Induced Pruritis, 2nd Joint Meeting of the Wound Healing Society and European Tissue Repair Society, Boston, MA, 1996 May
 9. **Urso RG**, Longhini L, Terry J, Konstantinova N, Ruiz RS: The Effect of Methylprednisilone, Ganglioside-GM and Nerve Growth Factor in Acute Optic Nerve Injury. ARVO 1997 May
 10. Konstantinova N, Jackow C, Duong M, Hakirzadeh M, **Urso RG**, Duvic M: Interferon Inducible Protein 10 (IP-10) is Present in Skin Equivalents and is Increased in Psoriasis Skin Equivalents. Society for Investigative Dermatology 1997 May
 11. Longhini L, **Urso RG**, Kountakis SE, Maillard AA: Management of Traumatic Optic Neuropathy, A Retrospective Study on 28 Patients, International Congress of Ophthalmology, Amsterdam, The Netherlands 1998 June
 12. McCullough PA, **Urso RG**, et al. “Multifaceted Highly Targeted Sequential Multidrug Treatment of Early Ambulatory High-Risk SARS-CoV-2 Infection (COVID-19).” *Rev Cardiovasc Med*. 2020 Dec 30; 21(4): 517-530
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Original Articles & Journals

1. Prager TC, **Urso RG**, Holladay JT, Stewart RH: Glare Testing in Cataract Patients: Instrument Evaluation and Identification of Sources on Methodological Error, *Cataract and Refractive Surgery* Vol. 15 1989 Mar; 15(2): 149-157

2. Weakley DR, **Urso RG**, Dias G: Asymmetric Inferior Oblique Overaction and its Association with Amblyopia in Esotropia, *Ophthalmology*. 1992 Apr; 99 (4): 590-593
3. Konstantinova N, Duong M, **Urso RG**, Korotkii NG, Duvic M: The Central Role of Fibroblasts in Epidermal Stratification and Differentiation *Biull Eksp boil med*. 1996 Jan; 121 (1): 80-84
4. Konstantinova N, **Urso RG**, Duvic M: Role of Fibroblasts and Keratinocytes Interaction in Secretion of IL-8. *Biull Eksp boil med*. 1996 Apr; 101(3): 97-102
5. Konstantinova N, Duvic M, **Urso RG**: Nerve Growth Factor Expression is Increased During Epidermal Regeneration in a Skin Equivalent Model. *Journal of Investigative Dermatology* 1997 April
6. Kountakis SE, Maillard AJ, **Urso RG**, Stiernberg CM: Endoscopic Approach to Traumatic Visual Loss. *Otolaryngology – Head and Neck Surgery*. 1997 June; 116 (6): 652-655
7. Konstantinova N, Noreen A, Lemak MD, Duong M, **Urso RG**, Duvic M: Artificial Skin Equivalent Differentiation Depends on Fibroblasts *Plastic and Reconstructive Surgery*. 1998 Feb; 101 (2): 385-391
8. Carinci F, Farina A, Longhini L, **Urso RG**, Pulucchi S, Calearo C: Is the New TMN (1997) the Best System for Predicting Prognosis? *International Journal of Oral and Maxillofacial Surgery* 1998 April
9. Prager TC, Kellaway J, Zhou Y, **Urso RG**, McIntyre S, Bedikian A: Evaluation of Ocular Safety: Tirapazamine plus Cisplatin in Patients with Metastatic Melanomas. *AntiCancer Drugs*. 1998 Vol. 9. 515-521
10. Carinci F, Farina A, Pelucchi A, Pastore L, Longhini L, **Urso RG**, Calearo C: Stage Group Reliability: TMN '97 v TANIS in Laryngeal Cancer. *Otolaryngology Head and Neck Surgery* 1999
11. Kountakis SE, Maillard AJ, El-Harazi SM, Longhini L, **Urso RG**: Endoscopic Optic Nerve Decompression for Traumatic Blindness. *Otolaryngology – Head and Neck Surgery* 2000 July; 123(1): 34-37
12. Khalil SK, **Urso RG**, Mintz-Hitner HA: Traumatic Optic Neuropathy Associated with Canalicular Laceration Following Forceps Delivery in a Term Newborn. *Journal of the American Association for Pediatric Ophthalmology and Strabismus*. Vol 7. No. 2; 2003 April
13. Stilianos SE, Maillard AJ, El-Harazi S, **Urso RG**: Management of Traumatic Optic Neuropathy. *Otolaryngology – Head and Neck Surgery* Vol. 121 Number 2

14. Hosse S, Calvano C, Diba R, Fuller GN, Gombos D, Del Monte F, **Urso RG**, Esmaeli B: Orbital and Optic Chiasmal Extension of Uveal Melanoma Ophthalmic Plastic Reconstructive Surgery. Vol. 20, Number 5 2004 June