

STATE OF MAINE,
CUMBERLAND, SS.

SUPERIOR COURT
CIVIL ACTION
DOCKET No. CV-24

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ROBERT F. KENNEDY, JR., :
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 Plaintiff :
 :
v. :
 :
 DAVID VICKREY; :
 :
 Defendant. :
 :
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**AFFIDAVIT OF ROBERT F. KENNEDY, JR. IN SUPPORT OF OPPOSITION TO
DEFENDANT’S MOTION TO DISMISS**

I, Robert F. Kennedy, Jr. declare as follows:

1. I am over the age of 18 years old and if called upon as a witness, could and would competently testify to the following facts based upon my personal knowledge, information and belief as indicated and upon what discovery will show.
2. I have spent my entire career as an advocate for constituencies neglected by institutional power, including important legal victories for minority communities, impoverished constituencies, and advocating for people of every race, religion, and creed, opposing all forms of discriminatory behavior and speaking out against antisemitism and racism. For two decades, I spoke out in favor of safe and effective vaccines for children, and I support the critical medical doctrine of individual informed consent, relying on principles developed by American jurists in the Nuremberg Code.

3. From the summer of 2020 through October of 2023, the defendant in the above-captioned action, David Vickrey (“Vickrey”), published defamatory statements to one or more third parties in Maine about me. On or after September 1, 2023, Vickrey published the following statements:
 - a. Kennedy helped cause the deadly Samoa Measles Outbreak and implied Kennedy hid his role in the outbreak;
 - b. Kennedy opposed all vaccines;
 - c. Kennedy expressed “dangerous vaccine conspiracies” that caused the death of 234,000 Americans;
 - d. Kennedy wanted to cause the death of black people;
 - e. Kennedy said COVID-19 was designed to save Jews;
 - f. Kennedy knowingly joined, supported and associated with a neo-Nazi party in Germany, Berlin; and
 - g. Anti-Vaxxer RFK Jr. joins neo-Nazis in massive Berlin ‘Anti-corona’ protests.
4. Substantial resources had to be spent trying to locate the source of these libels, and despite efforts at remedial settlement, this case became necessary to correct the public record.
5. Each of Vickrey’s factual statements about me are false. I never had a role in, much less caused, the Samoa Measles Outbreak. I have never opposed all vaccines. I did not cause the death of any Americans, much less 234,000 Americans, by expressing “dangerous vaccine conspiracies.” I never wanted nor caused the death of thousands of African-Americans, Jews, or anyone else. I never said that COVID-19 was designed to save Jews. I never joined any neo-Nazi party group in Germany, at any protest, or in any other manner,

at any time, in any way. I have advocated for science-based policies that saves vulnerable lives, not destroys them.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct. Executed on December 2, 2024, in New York, New York.

/s/ Robert F. Kennedy, Jr. _____

Robert F. Kennedy, Jr., declarant