

Affidavit of John Doe

I, John Doe, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), that the following is true and correct to the best of my knowledge:

1. I served honorably in the United States Army from August 15, 1968 to June 16, 1974. As a result of my time in service, I am currently service connected for sarcoidosis; diabetes mellitus type II; bilateral lower extremity peripheral neuropathy; and bilateral iridocyclitis. Due to the combination of my service-connected conditions, I have been unable to secure and follow substantially gainful employment since I last worked in 2010.
2. I last worked full-time in 2010 as a fuel truck driver. This job consisted of me driving a fuel truck and loading and offloading fuel in different locations. I was required to load fuel into the tanker I drove and then deliver it to locations. I had to usually stop back at the fuel yard in order to fill up again between trips. Typically, I made two trips in a day, sometimes three. Each one of the trips lasted at least two hours each way, sometimes up to four hours each way. I had to do out of state trips at least once a month, and these drives would usually start early in the morning and go until very late at night.
3. My service-connected sarcoidosis caused significant limitations on my ability to work when I was employed as a truck driver. I often experienced severe chest pains and shortness of breath, even while I was just sitting down and driving in my truck. I usually had to pull over at truck stops when I was on the road and take about a half-hour break so I could regain my composure and try to slow my heart rate down. I had to do this up to five times for every trip I made. This prevented me from completing my deliveries on-time and I was unable to be as productive as other drivers. When I would get out of my truck at a rest stop, I could not stand or walk around for more than fifteen minutes at a time without feeling extremely fatigued. My symptoms particularly limited my ability to work when I had to drive at night, as the combination of fatigue and nighttime driving made it difficult for me to operate my truck.
4. As a result of my service-connected diabetes mellitus type II, I had to take metformin twice a day when I was working so I could control my condition. This also resulted in me going out of my way to try and find a rest stop so I could take a break and take my medication. I further suffered from increased and uncontrolled urinary voiding due to my diabetes, along with excessive thirst. I had to stop at least every hour whenever I was on the road to find a nearby bathroom and/or get something to drink. I also had to monitor my blood sugar when I was working. There would be times when I would get an overwhelming sense of fatigue and I would need to check my blood pressure. This forced me to stop working to check my blood pressure, and significantly interrupted my ability to complete my daily tasks.
5. As a truck driver, my service-connected lower extremity neuropathy caused me to experience numbness in my legs all the way down to my feet. As a result of this, I often lost feeling in my legs while I was driving. I would have to stop to stretch out and take breaks as I could not be in a seated position for too long without my legs going numb.

Eventually, my service-connected diabetes mellitus worsened, and I had to start taking insulin. Due to state guidelines at the time, a truck driver could not be on insulin and hold a commercial driver's license at the same time. As a result of this, I had to stop working all together. I unfortunately lack any additional training or experience beyond my training as a truck driver.

6. My disabilities have only worsened over time. My sarcoidosis still gives me a frequent feeling of being short of breath and fatigued. As a result of my service-connected sarcoidosis, I have also developed bilateral iridocyclitis. This condition gives me unbearable pain in both of my eyes. I need to take prescription steroid eye drops four times a day to help control my condition, and even then the pain continues. When I experience a really bad flare of pain, I need to take Excedrin in addition to my eye drops because I will develop a very bad headache and the Excedrin is the only thing that will give me some kind of pain relief.
7. Today, my diabetes mellitus type II still requires me to take insulin once a day in addition to metformin twice time a day. I also have a restricted diet I need to follow. Due to my neuropathy, I experience extreme pain and numbness in my feet, to the point that I am very unsteady. I avoid going to places where I know there will be a lot of stairs because I don't want to risk falling down, and I also experience a lot of pain in my feet when I try to go up and down stairs. Due to all of these service-connected conditions, I do not believe I would be able to go back to work in any capacity.

I hereby certify that the information I have given is true to the best of my knowledge and belief.

John Doe

Date

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