

Worker #3

**AFFIDAVIT OF**

The undersigned, being first duly sworn and upon oath, attests to the following:

1. I reside at \_\_\_\_\_ My telephone number is \_\_\_\_\_

2. I was employed at Dr. Carhart's clinic for 9 months in 2002. I have personal knowledge of all things to which I attest herein.

3. When I applied for work at the clinic, I was and am a Medical Assistant. I responded to a "Help Wanted" sign.

4. Shortly after I was hired, two additional people were hired also. Like me, they had no medical training whatsoever. Nonetheless, they were taught and directed to emplace IV's and to administer IV drugs to patients. I was asked to participate in that, but initially declined.

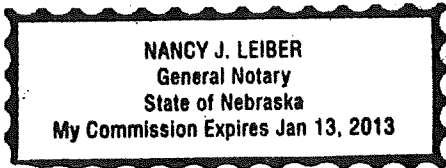
5. Eventually, I began doing those administrations also. On many occasions, I administered intravenous Fentanyl and Versed to patients.

6. Dr. Carhart's clinic is not kept in a reasonably clean and sterile condition as one would expect of a medical facility. There was always dried blood in the procedure/exam rooms, either on the floor, under machines, in the bedpans that were in the beds, on walls or on the instruments. Dr. Carhart would rarely wash his hands and would go from patient to patient without doing so. On many occasions, we would use dilators from packages that were supposed to be sterile but were instead contaminated with blood, tissue and other filth.

7. We were instructed to advise patients that any complications were to be handled by us, in the clinic, and not at a hospital.

9-2-09  
DATED \_\_\_\_\_

SWORN TO, ACKNOWLEDGED AND SUBSCRIBED BEFORE ME THIS 02 DAY OF SEPTEMBER, 2009 BY \_\_\_\_\_



Nancy J. Leiber  
NOTARY PUBLIC