

AFFIDAVIT OF

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

1. My name is _____ I am _____ years of age. I reside at _____

My telephone number is _____

2. I worked at Dr. Leroy Carhart's Abortion and Contraception Clinic of Nebraska from October of 2006 until June of 2009. I have personal knowledge of all things to which I attest herein.

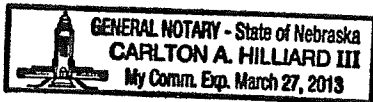
3. When I first started I would distribute medication (pills) of various kinds even though I've no medical training. I also worked in the back cleaning the instruments as well as prepping and cleaning the procedure rooms. I assisted the doctor in the operating room by handing him instruments and holding the ultrasound probe while he did procedures. I also did aftercare, which consisted of giving out snacks, checking vitals, checking patients for bleeding, making sure they were walking fine, and giving them instructions for when they left and went home. I also trained other girls in recovery care.

4. I would do the "education" where I would explain to the women what was going to happen to them and make sure they were not being coerced. If I thought a woman was under coercion, I was free to send her home. However, that changed in the last year of my employment. From that point, I was instructed to refer such women to either the nurse, Sherry Hron or Dr. Carhart for further counseling.

5. All I have is a high school diploma. I have no medical certification other than CPR training I got while in high school. However, for the last year of my employment I was doing IVs. I started IVs as well as administering the medication through them. Among the medications I administered were Fentanyl, Versed and Vistaril. I would also remove the IVs. Basically, I did everything. They wanted everyone to be trained in everything just in case someone called in sick or suddenly quit.

9-2-09
DATED _____

SWORN TO, ACKNOWLEDGED AND SUBSCRIBED BEFORE ME THIS 2 DAY OF SEPTEMBER, 2009 BY _____



Carlton A. Hilliard III
NOTARY PUBLIC