

AFFIDAVIT OF [REDACTED]

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

1. My name is [REDACTED]. I reside at [REDACTED]. My telephone number is [REDACTED].

2. I worked at Dr. Leroy Carhart's Abortion and Contraception Clinic of Nebraska from October of 2008 until August of 2009. I have personal knowledge of all things to which I attest herein.

3. During my employment at the abortion clinic I was given many tasks I found questionable. I was a convicted felon on parole. The job I thought I was being hired for was phone work and filing. However, on my first day I was helping with ultrasounds and assisting in the rooms. I feel Dr. Carhart hired me because [REDACTED]. The tasks that I did and things I find questionable are as follows:

4. They wanted me to bring in my high school diploma so I could work in the lab but because of my past and being an ex-IV drug user I didn't want to draw blood. However, I did give Depo Provera shots.

5. I eventually worked in the recovery room by myself. I was handling various medications there, including Cytotec, Doxycycline, Ibuprofen and Butabarbital. I also gave oral Methergine for the 3-day patients. I would put an antibiotic we called Ancef into the patient's IV bag. They had me draw it up into a 3cc syringe and put it directly into the IV bag. I would monitor the patients when they came out. No matter how much pain patients were in after abortions, they all got the same line: walk and do a uterine massage. Several times women would start bleeding heavily in the recovery room and then Dr. Carhart would repeat the D&C procedure. On one occasion a woman's water broke and she passed the pregnancy on the toilet in front of me. I had no training and no idea what to do for her in that situation.

6. The things I saw that were wrong at the clinic were first, falsifying gestational ages. [REDACTED] had taken an ultrasound on a minor who was pregnant and wanted an abortion. I remember [REDACTED] telling the girl "No, we cant do it. You are too far along." The girl started to cry and Dr Carhart came in the room and decided to in fact do it. Some of my coworkers were appalled, saying "No!" [REDACTED] walked by, saying "Suck it up. She is staying!"

7. I also had conversations with [REDACTED], the office manager. We both said that we would not have abortions in that clinic and would instead use the abortion pill due to the unsanitary instruments used and how Dr. Carhart would fall asleep during procedures as he was waiting for a patient to dilate. It is my opinion that Dr. Carhart was chemically impaired. Sometimes the nurse working primary would have to remind him certain things to do when he would forget vital steps during their procedure.

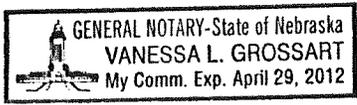
8. Several times we had close calls, discovering old blood on an instrument we were about to use on a new patient. How many times did we miss this?

9. Many things went missing from the pharmacy. The float was missing for \$100.00. IV sedation drugs were missing. A whole box of the abortion pill was also missing. Dr. Carhart has no regard for the state laws and safety of patients.

9-2-2009
DATED

[REDACTED]

SWORN TO, ACKNOWLEDGED AND SUBSCRIBED BEFORE ME THIS 2
DAY OF SEPTEMBER, 2009 BY [REDACTED]



Vanessa L. Grossart
NOTARY PUBLIC