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WITNESS AFFIDAVIT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

BEFORE ME, the undersigned Notary Public, personally came and appeared SANDRA PRICE, who after being sworn, did depose and say:

"My name is SANDRA PRICE, and for over fifteen years I was worked as a medical assistant at the Delta Women's Clinic in Baton Rouge, Louisiana. I worked continuously at the clinic for fifteen years until 1995, when I quit temporarily due to the premature birth of my child. In January of this year, Mr. Leroy T. Brinkley (the clinic's owner) asked me to return to my job at the clinic because he badly needed some competent help. They were under increasing pressure from the media at that point. I went back to work at that point as the administrator of the clinic, and stayed there until July 12th, when I recently resigned my position.

"My administrator's job at the Delta Women's Clinic consisted of: scheduling of employees; working bedside with Dr. James Whitmore and Dr. Eileen White-O'Neill; scheduling patients and paying bills. Essentially the only tasks that was not involved in at the clinic were ordering supplies, drawing blood or working in the scrub room.

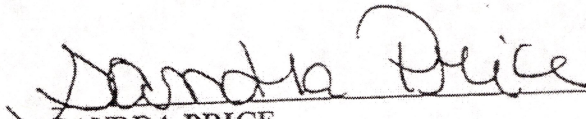
"There are many illicit practices going on inside the Delta Women's Clinic on a daily basis. For example: the doctors there, specifically Dr. Whitmore, regularly over-sedates his patients and has them physically carried to their cars behind the clinic to be sent home while still completely anesthetized; rusted and unsterilized instruments are repeatedly used in surgeries, and have even been broken off inside of patients; untrained and unlicensed persons are regularly used to assist in surgeries; proper records are not kept or correctly reported to the Department of Health and

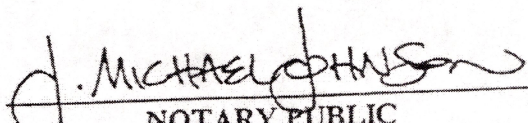
Hospitals; the state mandated pre-abortion counseling is not properly given to women; and many women have been physically harmed and/or emotionally taunted while inside the clinic.

"In early February of this year, right after I had returned to work at the clinic, the D.H.H. sent in three investigators to perform a health inspection. We stalled them in the front waiting room of the clinic, while other workers quickly gathered together the unsterilized hoses and re-packaged canulas (labeled "For One Use Only") and hid them in the "bio-med" box in the scrub room. The investigators were then allowed behind the locked door that separates the waiting room from the surgery rooms, and they walked through and did a quick check of the facility. They failed to report several obvious violations, such as the filthy condition of the carpeting, etc., and left the clinic after about ten minutes. The only things they looked at were what we voluntarily showed them. After they left, we took the hidden (contaminated) hoses and re-packaged canulas back out of the bio-med box and hung the hoses back on the wall, and put the canulas back on the shelf— all for further use.

"I notified Dr. Whitmore that the hoses were not being sterilized and that they were therefore contaminated his surgical trays and his own hands when he touched them, but nothing was ever done about it. We then asked L.T. Brinkley if we could order new supplies and hoses, but he told us that such supplies were not in the budget and not necessary."

I hereby certify that the above statement is true and accurate and was sworn to by me this 19th day of July, 1999, in Baton Rouge, Louisiana, at the offices of Thomas H. Benton & Associates, L.L.C.


SANDRA PRICE


NOTARY PUBLIC

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WITNESS AFFIDAVIT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

BEFORE ME, the undersigned Notary Public, personally came and appeared LISA TEEGARDEN, who after being sworn, did depose and say:

“My name is LISA TEEGARDEN, and I was employed as a ‘scrub tech’ at the Delta Women’s Clinic in Baton Rouge from late September, 1998 to last Thursday [July 15, 1999]. I worked on Wednesdays, Thursdays and Saturdays— just the ‘procedure days’— in the clinic. My job was to handle the surgical instruments. I cleaned, sterilized and set up the trays for the abortion operations.

“I am currently in school and am one year short of my obtaining my LPN licensing. In the past, I was a state certified paramedic and was a scrub tech and paramedic in the Army for six years. I also worked at an abortion clinic in St. Petersburg, Florida for three years. The clinic in St. Petersburg was run correctly, and in a much different fashion than the Delta Women’s Clinic. Because of my experience and training and over 17 years experience in the medical field, there were many practices at the Delta Clinic that I found disturbing.

“I can only really testify to the unsafe practices that related to the preparation and cleaning of the surgical instruments, because that is all I was involved in at Delta. (I was never in a surgery room when an actual procedure was taking place.) Still, there is much I could tell you about the sub-standard procedures there.

“I was always disturbed at attitude of the clinic’s owner and the doctors at Delta. They all had a mindset about saving costs, and they were much more concerned with making money than

with providing safe health care. For example, canulas and hoses that were labeled for individual use were not thrown away appropriately. Instead, we were made to prepare them for repeated use by the doctors on the patients. Since we had no way of gas [heat] sterilizing these plastic items (because they would melt in the auto-clave), we were forced to do a cold sterilization treatment instead. That consisted of soaking the items in a Sydex solution for 20 minutes. The problem was that the Sydex was old and contaminated itself. It was only occasionally changed, instead of every 30 days as required on the label. There was no sterile water available in the clinic at any time, and an employee would sometimes have to purchase a jug of distilled water on their own from time to time, just out of desperation.

“The hoses were used to run from the patient’s vaginal opening to the suction jar. It is a wonder that more women have not contracted HIV, hepatitis or other infections. Also, Whitmore, for example, would seemingly ‘double dose’ his patients with anesthesia. He had a sort of ‘God complex’, and had no compassion for his patients. I saw him become enraged and actually chase a woman down the hall once after she called him a dirty name. The instruments were rusted, and if you ran your hand down them it would leave an orange mark on your palm. The Hem dilators had dried and crusted blood down in the crevices of the engraved numbers. The blood had been there for so long that it was black.


“Also, Dr. Eileen White-O’Neill instructed us not to chart the drugs that she was using. When I asked her about the dosages that she was administering to insure that records were properly included in her patients’ charts, she specifically ordered me not to record anything because she had no DEA license to administer the drugs at all. In fact, we used a detailed colored sticker system to conceal from Dr. James Whitmore [the clinic’s supervising physician] the patients’ charts to whom

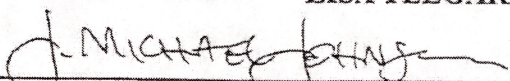
Dr. O'Neill had administered sedation. (Because she was using drugs that were ordered under his DEA number. There was no inventory of drugs kept at all.) Once, I also pushed some medication on a patient [gave an injection to sedate the patient] at O'Neill's request because she 'couldn't hit the vein.' I got very nervous about that incident later and refused to assist her in that way ever again.

"Sometimes I would discuss my 'wish list' of the *correct* instruments and new equipment that I thought the clinic needed with co-workers. In truth, the only time we got new supplies at all is when we would sneak around and order them without the owner or the clinic's doctors finding out about it. Overall, based on my experience, I would rate the general condition of the Delta Clinic as 'poor.' It was truly a dangerous situation in the facility.

"On last Wednesday, I learned that the clinic had been operating without an occupational license for two years. In addition, there was a new 'scrub tech' that I was supposed to be training in recent weeks. She had no experience, education or training for such a job, and was continually making mistakes that I thought were critical. When Brinkley [the clinic's owner] prohibited us from having more than one person in the 'scrub tech' room itself (because he said it wasn't necessary) I was no longer allowed to properly train the new girl. I have also become very concerned in recent weeks that my employment at the Delta Clinic would somehow jeopardize my ability to obtain my LPN license in the near future. For these reasons, I decided that enough was enough."

I hereby certify that the above statement is true and accurate and was sworn to by me this 21st day of July, 1999, in Baton Rouge, Louisiana, at the offices of Thomas H. Benton & Associates, L.L.C.


LISA TEEGARDEN


NOTARY PUBLIC

WITNESS AFFIDAVIT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

BEFORE ME, the undersigned Notary Public, personally came and appeared GLORIA MILES, who after being sworn, did depose and say:

“My name is Gloria Miles, and I am 20 years old. On December 2, 2000, I sought abortion services at the Delta Women’s Clinic in Baton Rouge, and was very upset by the way I was treated. It is now my belief that the Clinic may have also violated the law in providing its services to me.

“On November 22, 2000, I called the Clinic to schedule an abortion, and was told I had to go through counseling first. They set an appointment for me for December 2nd, I was told the total cost of my abortion would be \$315.

“When I arrived at 8 a.m. on December 2nd, as instructed, I signed in and waited about 45 minutes until I was called to the back. I was then told to pay \$140 (in cash), and asked for a picture I.D. Since a school I.D. was all I had, they accepted that. After my money was taken, I was asked to give urine sample. Then I was brought to a room with five other women and the six of us watched a ten minute video on the subject of abortion. The video included statements such as: ‘Most people feel very relieved after they have their abortion.’ It also explained that the procedure is very safe and that complications are few. The video also included a statement informing us that we would have an opportunity to meet and talk with our doctor, but none of us ever did.

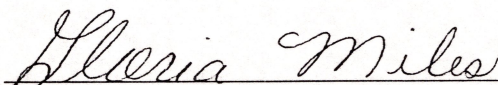
“After the video, a Clinic employee took us individually to another room to take a blood sample. Then, they called five girls at a time back into another room, where the Ultrasounds were performed. When it was my turn, I got onto the table. I was very uncomfortable with the situation. The woman operating the Ultrasound machine was not wearing any gloves, and the whole process

seemed unsanitary. She squirted the gel onto my stomach and abruptly began her procedure, but seemed shocked at what she saw on her monitor. She said aloud, 'Oh, Lord—I can't find the leg!' She asked another Clinic employee to come into the room and help her measure my child's head. It was apparent that neither lady knew very well what she was doing, and it upset me terribly. When they finished the Ultrasound, the first woman simply pushed my shirt back down over my belly, which was covered with the lubricating gel. My clothing became wet and sticky. She didn't even give me an opportunity to wipe the gel off of my body first. Incidentally, I found out by a competent doctor that I was 16 weeks along in my pregnancy on January 11th. (At the Clinic on *December 2nd*, they told me I was at 14 weeks.)

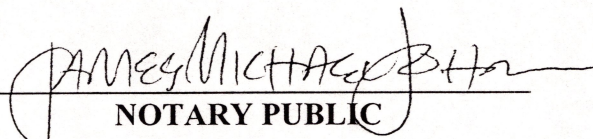
"By the time I left that room, I had changed my mind about the abortion, so I went to the front desk to inform them of my decision. I asked for my \$140 'deposit' money back, and they refused to give it to me. I was very upset, so I left.

"As far as I could tell, the Delta Women's Clinic only has two main rooms in its building. One is used for the group counseling, and one is used for the abortion procedures. If a girl wanted to sit down for individual counseling with her doctor, I don't even think they would have a place for that.

I hereby certify that the above statement is true and accurate and was sworn to by me this 19th day of January, 2001, in Baton Rouge, Louisiana, at the offices of Benton, Benton & Associates, L.L.C.



GLORIA MYLES



NOTARY PUBLIC