

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
GENERAL CIVIL DIVISION

ESTATE OF LISA McPHERSON, by and
through the Personal Representative,
DELL LIEBREICH

Plaintiff,

vs.

Case No. 00-5682-C1
Section 11

CHURCH OF SCIENTOLOGY FLAG
SERVICE ORGANIZATION, INC.;
JANIS JOHNSON; ALAIN KARTUZINSKI;
and DAVID HOUGHTON.

AFFIDAVIT

Defendants.

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

BEFORE ME, the undersigned authority, personally appeared CALVIN M. BANDT,
M.D., who, who after being duly sworn by me, deposes and says:

1. The affiant is a board certified forensic and clinical pathologist who attaches
his C.V. hereto.

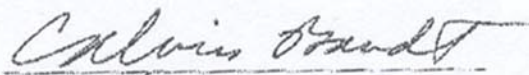
2. Affiant has been retained by the Plaintiff to render opinions concerning the
medical aspects of the above case. In so doing, affiant has reviewed the statements and
depositions of the Scientology staff watching Lisa McPherson at the Fort Harrison Hotel,
especially the last 8 days of her life. Affiant was personally involved in the re-testing of the
autopsy specimens at the National Medical Services laboratory and St. Anthony's Hospital
in December 1999.

3. It is the opinion of the affiant, based upon reasonable medical probability, that the specimens of vitreous fluid, blood, and urine of Lisa McPherson during the autopsy of December 6, 1995, was properly collected, stored, shipped, and tested. It is the affiant's further opinion that there is no evidence of tampering with the specimens.

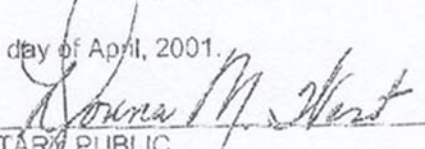
4. It is the affiant's opinion that the post-mortem chemistries of Lisa McPherson's autopsy and the two subsequent testings confirm that Lisa McPherson was severely dehydrated and therefore in uremic coma as a result of pre-renal azotemia during the last several days of her life. Consequently, the statements and testimony of some of the Scientology staff watching Lisa during the last days of her life are inconsistent with the post-mortem chemistry results and other Scientology staff who watched her. Therefore, it is the affiant's opinion that the inconsistent statements of Scientology staff noted above is unreliable and pure fantasy.

5. It is the opinion of the affiant that after considering all of the evidence, i.e., the caretaker logs and depositions, as well as the autopsy and post mortem chemistry results, photographs taken during autopsy, that the manner of death of Lisa McPherson is classified as homicide as a result of the intentional neglect of medical care.

FURTHER AFFIANT SAITH NOT.


CALVIN M. BANDT, M.D.

Sworn to and subscribed before me this 23rd day of April, 2001.


NOTARY PUBLIC
My commission expires:

Personally Known
Produced ID _____
Type of ID Produced _____



Donna M. West
MY COMMISSION # 00571446 EXPIRES
October 31, 2003
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