IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIRCUIT CIVIL CASE NO. 03-008212-CI-20

MICHAEL SCHIAVO, as Guardian of
the Person of THERESA MARIE SCHIAVO,

Petitioner,

vs.

JEB BUSH, Governor of the State of Florida,
and CHARLIE CRIST, Attorney General
of the State of Florida,

Respondents.
_____/

AFFIDAVIT

STATE OF FLORIDA }
COUNTY OF PINELLAS }

BEFORE ME the undersigned authority personally appeared CARLA SAUER IYER, R.N., who being first duly sworn, deposes and says:

1. My name is Carla Sauer Iyer. I am over the age of eighteen and make this statement of my own personal knowledge.

2. I am a registered nurse in the State of Florida, having been licensed continuously in Florida from 1997 to the present. Prior to that I was a Licenses Practical Nurse for about four years.

3. I was employed at Palm Garden of Largo Convalescent Center in Largo, Florida from April of 1995 to August 11, 1996, while Terri Schiavo was a patient there.

4. It was clear to me at Palm Gardens that all decisions regarding Terri Schiavo were made by Michael Schiavo, with no allowance made for any discussion, debate or normal

professional judgment. My initial training there consisted soley of the instruction "Do what Michael Schiavo tells you or you will be terminated." This struck me as extremely odd.

5. I was very disturbed by the decision making protocol, as no allowance whatsoever was made for professional responsibility. The atmosphere throughout the facility was dominated by Mr. Schiavo's intimidation. Everyone there, with the exception of several people who seemed to be close to Michael, was intimidated by him. Michael Schiavo always had an overbearing attitude, yelling numerous times such things as "This is my order and you're going to follow it." He is very large and uses menacing body language, such as standing too close to you, getting right in your face and practically shouting.

6. To the best of my recollection, rehabilitation had been ordered for Terri, but I never saw any being done or had any reason at all to believe that there was ever any rehab of Terri done at Palm Gardens while I was there. I became concerned because nothing was being done for Terri at all, no antibiotics, no tests, no range of motion therapy, no stimulation, no nothing. Michael said again and again that Terri should NOT get any rehab, that there should be no range of motion whatsoever, or anything else. I and a CNA named Roxy would give Terri range of motion anyway. One time I put a wash cloth in Terri's hand to keep her fingers from curling together, and Michael saw it and made me take it out, saying that was therapy.

7. Terri's medical condition was systematically distorted and misrepresented. When I worked with her, she was alert and oriented. Terri spoke on a regular basis in my presence, saying such things as "mommy", and "help me". "Help me" was, in fact, one of her most frequent utterances. I heard her say it hundreds of times. Terri would try to

say the word "pain" when she was in discomfort, but it came out more like "pay". She didn't say the "n" sound very well. During her menses she would indicate her discomfort by saying "pay" and moving her arms toward her lower abdominal area. Other ways that she would indicate that she was in pain included pursing her lips, grimacing, thrashing in bed, curling her toes or moving her legs around. She would let you know when she had a bowel movement by flipping up the covers and pulling on her diaper.

8. When I came into her room and said "Hi, Terri", she would always recognize my voice and her name, and would turn her head all the way toward me, saying "Haaaiiii" short of,, as she did. I recognized this as a "hi", which is very close to what it sounded like, the whole sound being only a second or two long. When I told her humorous stories about my life or something I read in the paper, Terri would chuckle, sometimes more a giggle or laugh. She would move her whole body, upper and lower. Her legs would sometimes be off the bed, and need to be repositioned. I made numerous entries into the nursing notes in her chart, stating verbatim what she said and her various behaviors, but by my next on-duty shift the notes would be deleted form her chart. Every time I made a positive entry about any responsiveness of Terri's, someone would remove it after my shift ended. Michael always demanded to see her chart as soon as he arrived, and would take it in her room with him. I documented Terri's rehab potential well, writing whole pages about Terri's responsiveness, but they would always be deleted by the next time I saw her chart. The reason I wrote so much was that everybody else seemed to be afraid to make positive entries for fear of their jobs, but I felt very strongly that a nurse's job was to accurately record everything we see and hear that bears on a patient's condition

and their family. I upheld the Nurses Practice Act, and if it cost me my job I was willing to accept that.

9. Throughout my time at Palm Gardens Michael Schiavo was focused on Terri's death. Michael would say "When is she going to die?", Has she died yet?" and "When is that bitch gonna die?" These statements were common knowledge at Palm Gardens, as he would make them casually in passing, without regard even for who he was talking to, as long as it was a staff member. Other statements which I recall him making include "Can't you do anything to accelerate her death – won't she ever die?" When she wouldn't die, Michael would be furious. Michael was also adamant that the family should not be given information. He made numerous statements such as "Make sure the parents aren't contacted." I recorded Michael's statements word-for-word in Terri's chart, but theses entries were also deleted after the end of my shift. Standing orders were that the family wasn't to be contacted, in fact, there was a large sign in the front of her chart that said under no circumstances was her family to be called, call Michael immediately, but I would call them anyway, because I thought they should know about their daughter.

10. Anytime Terri would be sick, like with a UTI or fluid buildup in her lungs, colds, pneumonia, Michael would be visibly excited, thrilled even, hoping that she would die. He would call me, as I was the nurse supervisor on the floor, and ask for every little detail about her temperature, blood pressure, etc., and would call back frequently asking if she was dead yet. He would blurt out "I'm going to be rich!", and would talk about all the things he would buy when Terri died, which included a new car, a new boat, and going to Europe, among other things.

11. When Michael visited Terri, he always came alone and always had the door closed and locked while he was with Terri. He would typically be there about twenty minutes or so. When he left Terri would be trembling, crying hysterically, and would be very pale and have cold sweats. It looked to me like Terri was having a hypoglycemic reaction, so I'd check her blood sugar. The glucometer reading would be so low it was below the range where it would register an actual number reading. I would put dextrose in Terri's mouth to counteract it. This happened about five times on my shift as I recall. Normally Terri's blood sugar levels were very stable due to the uniformity of her diet through tube feeding. I remember finding an insulin vial wrapped up in the rubbish bin in Terri's room during one of the incidents I am referring to. It is my belief that Michael injected Terri with Regular insulin, which is very fast acting.

12. The longer I was employed at Palm Gardens the more concerned I became about patient care, both relating to Terri Schiavo, for the reasons I've said, and other patients, too. There was an LPN named Carolyn Adams, known as "Andy" Adams who was a particular concern. An unusual number of patients seemed to die on her shift, but she was completely unconcerned, making statements such as "They are old – let them die." I couldn't believe her attitude or the fact that it didn't seem to attract any attention. She made many comments about Terri being a waste of money, that she should die. She said it was costing Michael a lot of money to keep her alive, and that he complained about it constantly (I heard him complain about it all the time too). Both Michael and Adams said that she would be worth more to him if she were dead. I ultimately called the police relative to this situation, and was terminated the next day. Other reasons were cited, but I was convinced it was because of my "rocking the boat".

13. Ms. Adams was on e of the people who did not seem to be intimidated by Michael. In fact, they seemed to be very close, and Adams would do whatever Michael told her. Michael sometimes called Adams at night and spoke at length. I was not able to hear the content of these phone calls, but I knew it was him talking to her because she would tell me afterward and relay orders from him.

14. While at Palm Gardens, I became fearful for my personal safety. This was due to Michael's constant intimidation, including his menacing body language, vocal tone and mannerisms.

15. I have contacted the Schindler family because I just couldn't stand by and let Terri die without the truth being known.

FURTHER AFFIANT SAYETH NAUGHT.

CARLA SAUER IYER, R.N.

The foregoing instrument was acknowledged before me this 15th day of December, 2003, by CARLA SAUER IYER, R.N., who produced her Florida driver's license as identification, and who did / did not take an oath.

Notary Public

My commission expires:

Jill D Smith
My Commission DD077369
Expires March 6, 2006