

staff had to stay late to provide care for the patients. Personally, staying late is not a problem for me as long as our patients are tended to safely. There were only two RNs (myself and Maura). Maura had to leave as she had commitments at her second job. This being the case, we do not have an RN working in the suites as I am working in the recovery room. I stated to Marquet and Dr. Liveright, "We aren't going to be able to take care of all these patients". Marquet stated she would talk to Gloria. The next thing I know, Gloria is holding the charts and instructing the staff to continue. Marquet was assigned to the suites. Marquet is an LPN in the State of Maryland. She is unaware of what nursing skills she can legally provide in Delaware...so Marquet assists Dr. Liveright in the suites at the direction of Gloria. Paperwork could not be completed properly as an RN or MD signature was necessary. During this time, not only was Dr. Liveright continuing to provide abortions, he assigned a medical intern to also provide abortions in this reckless manner. The medical intern had voiced to me that she was very nervous and was just here to observe. In the meantime, Gloria continues to "direct traffic". One of the patients had to return from the recovery room back to the suite as she was bleeding too heavily and needed to be reassessed. I am not sure of the circumstances with this patient as she was brought in to the recovery room and then taken back to the suites before she was "handed over" to my care. I am not sure if it was Dr. Liveright or the medical intern that provided the patient's care in the suites. I reported the happenings of this day to Dr. Carole Meyers. Gloria Johnson was already aware of the situation as she was present during the entire event.

2. On Friday, July 6, 2012, Dr. Liveright called the unit explained that he had yet another emergency and would be late. Again, we have patients medicated and "ready" for his arrival. Marquet was made aware that Dr. Liveright had another emergency and would be late. She stated that she would report this finding to Gloria Johnson. This particular Friday, we had 3 RNs assigned to the medical service area. Renee was assigned to the suites. Joyce Vasikonis was assigned to the recovery room, and I acted as a floater in the suites and the recovery room. I do not often work in the suites with Dr. Liveright, but on this day I was subjected to his inappropriate behavior and had the opportunity to witness his care in the suites directly. Below is a list of his behaviors on this day:

a. When I asked Dr. Liveright what size sterile gloves he needed, he stated, "I don't use those" as he donned a pair of clean gloves during a sterile procedure. Clean gloves are not sterile gloves.

b. While performing a surgical abortion, he loudly sings hymns. An example of a song that a patient had to endure him singing was "Jesus....Ohhhh Jesus....take the sinners down by the river....Ohhh Jesus". In the meantime, the patient has tears streaming from her eyes as I

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attempt to distract her from Dr. Liveright's poor choice of song. This behavior is very disturbing and unprofessional for the patient as well as anyone else in the room.

c. When not in a suite performing an abortion, Dr. Liveright consistently walks up and down the hallways outside the recovery room door (in hearing range of those patients who are recovering, as well as those patients being pre-medicated for an abortion, and patients that are receiving medical abortion information) and loudly states, "Let's get this place rolling" "Where's the patients?" "Bring them in here" "Let's get them in". This again is disturbing for our patients and our staff. I note staff attempting to distract Dr. Liveright from acting in such a horrendous way as well as trying to distract the patients from hearing his rants. This behavior is NOT reassuring the patients that they are going to receive the best possible care.

d. An example of how Dr. Liveright greets patients: Dr. Liveright enters the room, assess the patient's name and because the patient's name sounds like a place in Africa states, "Oh Bella (which is not the patient's name) did you know that the Belgians took over Africa and did really bad things." (The patient is African-American) He is asking this as he is injecting the patient with Lidocaine. He continues to carry this conversation on with himself while he roughly dilates and then belittles the patient. After informing the patient (by the way a patient that is crying and holding on to my hand tight as I try to distract her from him) about how terrible the Belgians' treated the Africans he states, "The United States does the same thing. Did you know that?" The patient with tears falling down her cheeks shakes her head indicating "no" which Dr. Liveright replies "I didn't think you'd know anything about that" Yup.. the United States is a big bully". I continued to coach the patient on how to breathe and talked to her through the procedure. I also told Dr. Liveright that I too was unaware that the Belgians' had taken over Africa so that the patient would not feel so bullied and belittled.

e. In between patients, Dr. Liveright decided that he would clean the rooms himself to hurry things along. However, he did not clean the room per Planned Parenthood procedures, as I as well as a new staff member, Iesha Holley noted dried blood on the exam table. Dr. Livewell throws the chart across the counter in the suite and states, "Next chart...Let's move".

f. In the middle of a procedure, Dr. Liveright holds up equipment within the patient's eye view and states that the equipment is not "workable". He also complains to the patient and me about the lack of staffing, and that he will have to just "make do until they (meaning Planned Parenthood of Delaware) gets it figured out". He stated, "It has gone from bad to worse". Dr. Liveright makes these statements as he is in the middle of performing abortions.

g. Often Dr. Liveright starts his day by wearing a scrub uniform that is wrinkled and stained with what appears to be bloody drainage. His personal hygiene is unprofessional as well.

\* h. When starting an IV, Dr. Liveright uses the same needle for multiple sticks. This is not proper medical procedure.

i. During a procedure that another doctor was performing, Dr. Liveright entered the room to see how things were proceeding. The doctors had a conversation regarding the faulty equipment in front of the patient while continuing to perform the abortion. At which time, I continued to concentrate on the patient care which consisted of offering support, hand holding, and coaching her on breathing relaxation techniques. After the doctors finished their conversation, Dr. Liveright struck the patient's right lateral thigh with force with his opened hand stating "BREATHE!". The patient shocked and puzzled looked at me as if to say what is he doing? I suggested that Dr. Liveright must have some sort of unusual technique to help distract patient from the discomfort of the procedure. The patient looked at me, rolled her eyes, held my hand tight, and tried to relax and concentrate on her breathing. That is when Dr. Liveright peeks around the curtain (as he had not exited the room) and plays peek-a-boo with the patient. The patient then rolls her eyes and shakes her head stating, "He's not right". The entire time this is happening, the other doctor is continuing to dilate the patient! I then stated, "Goodbye Dr. Liveright" as I pulled the curtain around his head to prevent the patient from being subjected to more of Dr. Liveright's unprofessional behavior.

j. Sexual harassment: I have noted Dr. Liveright's inappropriately look up and down patients as well as staff members in a sexually kind of way. He actually stands back with a grin and slowly and directs his eyes up and down patient's body. I also have heard him make comment to a recently terminated employee about how good she looks.

I reported the happenings of this day to Marquet. I also emailed Dr. Meyers asking to speak with her privately. She emailed me back that if I needed to discuss a medical concern she would be in the office but had a number of meetings to attend on Tuesday and Wednesday. She also referred me to Gloria if the issue I needed to discuss was a staffing issue. I informed her it was both a medical and staffing issue and that I would speak with someone. My plan was to speak to Gloria Johnson this past Friday (7/13/12), but the two times I went to her office she was not present so I decided this letter would be the best way to communicate.

3. On Friday, July 13, 2012, I was scheduled to work in the recovery room so I did not work directly with Dr. Liveright. I did hear him call out (as did other staff members and patients) a number of times, "Bring the patients in". He also approached me as he wanted me to process the medical abortions faster. He also wanted me to bring patients right over to the suites after premedicating them. I told him that I was unable to bring the patients "right over" as I was working in the recovery room and could not leave the patients safely. I also told him that the rooms needed to be cleaned. He stated that the rooms were cleaned and that he had readied them himself. I knew what this meant and again told him that I would not bring the patient into

the suite until the nursing staff was ready. I also cared for a number of crying patients in the recovery room that complained about Dr. Liveright's care. One patient said, "I will never come here again" "I have never been treated so bad" "They (referring to the nurse and Dr. Liveright) were just talking amongst themselves and not even helping me get through all of this".

It is difficult for me as a registered nurse, let alone a caring human being, to tolerate the poor, substandard, and unprofessional care Dr. Liveright is providing to the patients at Planned Parenthood of Delaware. Patient safety and well-being are being consistently compromised with his inappropriate and negligent actions/behaviors. I feel this is a very serious matter and needs to be addressed immediately. I would like to know what actions will be taking place to ensure our patients are cared for safely and compassionately.

Sincerely,

Jayne Mitchell-Werbrich RN

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