

Affidavit of

in the case of Dr. Douglas Karpen and the Aaron Women's Center

Submitted in Confidentiality to the:

Office of the Attorney General
Robert Allen, Deputy Chief of Staff
PO Box 12548
Austin, TX 78711-2548

Texas Medical Board
Investigations Department, MC-263
PO Box 2018
Austin, TX 78768-2018

Health Facility Compliance Group (MC 1979)
Texas Department of State Health Services
PO Box 149347
Austin, TX 78714-9347

Harris County District Attorney
Mike Anderson
1201 Franklin Street, Suite 600
Houston, Texas 77002-1923

Houston Police Department
Lieutenant Richard Kleczynski
1200 Travis
Houston, TX 77002

Declaration of Fact

I, [REDACTED], being of sound mind and judgment, do hereby make the following declaration of fact, complaint, and allegations of criminal behavior against Dr. Douglas Karpen, License No. E5127, and the Aaron Women's Center, License No. 007339.

I am a [REDACTED] In 2002 and 2006, I received abortions from Dr. Karpen at the Aaron Women's Center at 5607 Schumacher Lane in Houston, Texas, during which procedures I witnessed and was the victim of unprofessional conduct, abusive treatment, and legal violations.

These experiences are my secret shame, and I request that my identity remain confidential.

Experience #1:

On [REDACTED] 2002, I was 24 to 25 weeks pregnant. I was terrified. The longer I took to get the money together, the more expensive the procedure became.

I went into the office of Aaron Women's Center. I was shaking and worried that I was too far along. The girl doing my ultrasound told me that "ultrasounds can be manipulated." The clinic determined me to be 23 weeks. They would require \$1400 for the abortion procedure.

The first day, Dr. Karpen inserted laminaria without anesthesia. He was very rough and vulgar to me. I paid extra for deep anesthesia for the next two days, feeling violated.

The clinic told me to be back tomorrow, early. I drove home, [REDACTED] and cramped all night.

The next morning, I returned and was given an IV and meds by his employees. A patient assistant started my IV, and I was out cold. I woke up shivering in a recliner.

I had heard the girls speak of the size of my baby and I saw the bag.

I drove home with antibiotics and was sick and bleeding for weeks. I was so pro-choice that I was grateful to Dr. Karpen. I vowed never to go through that experience again.

Experience #2:

In [REDACTED] of 2006, I felt incredibly ill. [REDACTED]

I was 14 weeks pregnant when I went to an abortion clinic. The woman who was doing the ultrasound stopped and said, "This is twins! In separate sacs, but twins!"

[REDACTED] I started to cry.

They took me to a room and gave me twilight sedation. The doctor came in and began. Then he stopped and said, "Do you know you have a huge cyst?"

I said, "No."

He told me he was going to back off, and the procedure was way too dangerous.

I numbly got dressed and the staff told me that no doctor should touch me.

I began to research and found out that ambulatory clinics had come into play, and Houston had only one: Aaron Women's Center. I shuddered and called. By now I was 18 weeks pregnant.

They didn't care about the cyst or twins. They didn't care that I [REDACTED]

[REDACTED] They would see me.

I went back to the clinic. Women were everywhere. I received almost zero counseling. They told me my price was \$2200. They pushed anesthesia on me, saying the pain of laminaria was excruciating.

They took me back to a filthy room, where I got sedated and lammed. Before I went under, Dr. Karpen slapped my thigh and said I was a thick girl.

I was told I needed to bring more money because of [REDACTED]. Again I went home, [REDACTED]

Cramping in pain, the next day I returned to the ambulatory center. They took more money from me [REDACTED] The employees put me in another chair, and started my IV.

There were so many visibly pregnant girls in chair after chair. I was scared, and having flashbacks. They took me to the back.

I said I was scared and needed a ride home. They told me to "shut up and lay back." Something went over my face and I was out cold.

I woke up with Dr. Karpen beside me. I looked at the clock. Way too much time had passed. Dr. Karpen said, "You had us worried!" He said that I had "scared them." Apparently, I was overdosed and began to seize and vomit.

No one called for help and they still aborted the twins. My whole body ached and I was covered in blood and vomit. Dr. Karpen told me that my throat would hurt.

I stood up. Fluids and blood gushed out everywhere. They gave me my clothes, some pads, and told me I could go.

I was so high, I drove over a concrete barrier and the security guard had to help me. I also believe I was in shock.

I fell into a deep depression. When I saw the clinic workers who had helped me on video, it all came rushing back. Those women are so brave and I want to be that brave. It is my deepest secret shame.

Allegations:

As a two-time patient and eyewitness of Dr. Karpen's barbaric practices, I make the following allegations of illegal activity on the part of Douglas Karpen and the Aaron Women's Center:

- 1) Illegal late-term abortions
- 2) Sexual abuse of patients
- 3) Violation of informed consent law
- 4) Administration of IV's and controlled substances by unlicensed employees
- 5) Overdosing patients
- 6) Improper sedation techniques
- 7) Complete sedation of patients to the point of unconsciousness without patient consent
- 8) Extortion
- 9) Unsanitary conditions
- 10) Improper disposal of fetal remains

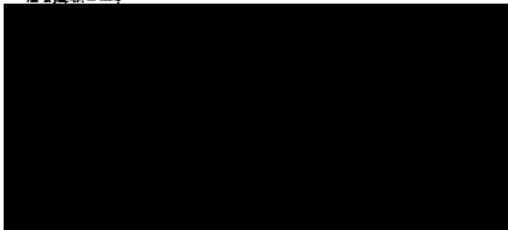
I am willing to testify, if the case reaches that point; however, I [REDACTED] request that my anonymity be protected.

Prayer

In light of the serious nature of these allegations and the imminent danger that Dr. Douglas Karpen and the Aaron Women's Center present to public safety and women's health in Texas, I hereby request the emergency suspension of Dr. Karpen's medical license and Aaron Women's Center abortion facility license pending a complete investigation of the criminal behavior and legal violations alleged in this document.

I further request that upon the finding of such violations, the Texas Medical Board, Texas Department of State Health Services, Harris County District Attorney, Houston Police Department or other appropriate state agency duly prosecute Dr. Karpen and the Aaron Women's Center to the fullest extent of the law.

Signed,



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Date



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