

**STATE OF CALIFORNIA
COUNTY OF MENDOCINO**

AFFIDAVIT

Personally, appeared before the undersigned, an officer duly authorized by law to administer oaths, Claire Teske, R.N., who after being duly sworn did state under oath as follows:

1. I am over the age of 18, suffer from no disabilities, and am competent to make this Affidavit. I am a licensed registered nurse in California and was licensed at the time of treatment discussed in this Affidavit. The matters stated herein are based on my own professional knowledge, including my training and experience as a registered nurse who works with patients in jails and who has admitted patients to jail infirmaries and also had patients transported to hospitals for further treatment and evaluation.

2. I have been engaged in the active practice of nursing for at least the last five (5) years with sufficient frequency to establish an appropriate level of knowledge of how patients should be treated by registered nurses and licensed practical nurses. For the last twenty (20) years I have worked in correctional institutions and jails as a registered nurse and have managed and supervised other registered nurses, licensed practical nurses, and medical support staff including secretaries and medical technicians.

3. I am knowledgeable as to the standard of care for registered nurses and licensed practical nurses in general and in the confines of detention centers, jails or correctional institutions. I am knowledgeable as to the standard of care for registered nurses and licensed practical nurses who are presented patients in an infirmary setting with abdominal pain, profuse sweating, vomiting, nausea, altered mental status, detoxing from drugs and/or alcohol and just being sick in general.



4. The standard of care for a registered nurse is the reasonable degree of care and skill which, under similar conditions and like circumstances, is ordinarily employed by the profession generally. The standard of care for registered nurses treating patients in general and in confinement includes:

- a. Assess the patient/client in a systematic, organized manner;
- b. Formulate a nursing diagnosis based on accessible, communicable and recorded data (which is collected in a systematic and continuous manner);
- c. Plan care which includes goals and prioritized nursing approaches or measures derived from the nursing diagnoses;
- d. Implement strategies to provide for patient/client participation in health promotion, maintenance and restoration;
- e. Initiate nursing actions to assist the patient/client to maximize his/her health capabilities;
- f. Evaluate with the patient/client the status of goal achievement as a basis for reassessment, reordering of priorities, new goal-setting and revision of the plan of nursing care;
- g. Communicate, collaborate and function with other members of the health team to provide optimum care;
- h. Respect the dignity and rights of the patient/client regardless of socioeconomic status, personal attributes or nature of health problems; and
- i. Provide nursing care without discrimination on the basis of diagnosis, age, sex, race, creed or color.

5. The standard of care for a licensed practical nurse treating patients in general and in confinement includes:

a. Participating in patient assessment activities and the planning, implementation, and evaluation of the delivery of health care services and other specialized tasks when appropriately educated and consistent with board rules and regulations;

b. Providing direct personal patient observation, care, and assistance in hospitals, clinics, nursing homes, or emergency treatment facilities, or other health care facilities in areas of practice including, but not limited to: coronary care, intensive care, emergency treatment, surgical care and recovery, obstetrics, pediatrics, outpatient services, dialysis, specialty labs, home health care, or other such areas of practice;

c. Performing comfort and safety measures;

d. Administering treatments and medications by various routes;

e. Participating in the management and supervision of unlicensed personnel in the delivery of patient care; and

f. Performing other specialized tasks as appropriately educated.

6. I have reviewed Kevil Wingo, Sr.'s September 24th -29th, 2019 medical records at Cobb County Adult Detention Center, Infirmary Videos, Cobb County Adult Detention Center Policies and Procedures and other materials regarding Kevil Wingo's care and treatment at Cobb County Adult Detention Center (hereinafter referred to as "CCADC".)

7. I have evaluated the treatment provided to Mr. Wingo by Nurse Yvette Burton, Nurse Shanna Griffith, Nurse Kelly Jones, Nurse Annaleen Visser, Nurse Shannea Hopkins and Nurse Samantha Garland.

8. Nurse Yvette Burton, Nurse Shanna Griffith and Nurse Kelly Jones were the nurses assigned to care for Mr. Wingo on September 28-29 from around 11:45 p.m. to 6:00 a.m. Nurse Annaleen Visser, Nurse Samantha Garland and Nurse Shannea Hopkins were assigned to care for Mr. Wingo on September 29, 2019 from around 6:00 a.m. until he died. I reviewed all of these medical providers' notes and video of their involvement with Mr. Wingo's care and treatment.

9. In my professional opinion, Nurse Yvette Burton, Nurse Shanna Griffith, Nurse Annaleen Visser, and Nurse Samantha Garland violated the standard of care for registered nurses by failing to care for Mr. Wingo as indicated in Paragraph 4 (a) – (i). Nurse Yvette Burton failed to send Mr. Wingo to the hospital for care and evaluation and should not have admitted him into the infirmary. Nurse Shanna Griffith did not care for Mr. Wingo and should have checked his vitals regularly and evaluated and assessed Mr. Wingo. Nurse Annaleen Visser did not properly care for Mr. Wingo and should have reviewed his chart when her shift began, evaluated and examined Mr. Wingo when he was in obvious physical distress and checked his vitals. Nurse Samantha Garland should have evaluated, examined and cared for Mr. Wingo when she saw him in obvious physical distress.

10. In my professional opinion, Nurse Kelly Jones and Nurse Shannea Hopkins violated the standard of care for licensed practical nurses by failing to care for Mr. Wingo as indicated in Paragraph 5(a) – (f). Both Nurse Kelly Jones and Nurse Shannea Hopkins failed to care for Mr. Wingo at all when they saw that he was in physical distress and failed to check his vitals.

11. To a reasonable degree of medical certainty, it is my professional opinion that the above mentioned nurses failure to properly care for Mr. Kevil Wingo, Sr. caused his death on September 29, 2019.

FURTHER AFFIANT SAYETH NOT.



Claire Teske, R.N.

Sworn and subscribed
Before me this 12th day
Of August, 2020



Notary Public

My Commission Expires: 03/16/2024

