

JAN 25 1999
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State of Georgia)
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County of Gwinnett)

AFFIDAVIT OF PAM FLOENER

I speak, read, write and fully understand the English Language.

I, Pam Floener, live in Gwinnett County, GA. My address is 5885 Cumming Highway #108-291, Sugar Hill, GA. 30518. I have been interviewed by Investigator Don Short from the Board of Medical Examiners and I have submitted written documentation on matters pertaining to the medical practices at Cascade Health Group, 9310 SE Stark St., Portland, Oregon. The following information is an accurate summation of some if not all of my knowledge and involvement with Cascade Health Group and Paula R. Bickle, Ph.D., who owns and operates this facility with her husband, Howard Bickle.

My background includes over 20 years in the health care field. I am a Physician's Technician, Registered Medical Assistant, Certified Nutritional Counselor, Chelation Technician and Registered Hypnotherapist.

I became acquainted with Paula Bickle in 1995 while attending an ISCT (International Society of Chelation Technicians) training workshop in New Orleans, LA. Dr. Paula Bickle, an instructor at the workshop, made references to mercury toxicity and DMPS research which was an area of interest to me and I was actively pursuing additional information and documentation. I subsequently attended Paula's seminar held in Dallas, Texas in October of 1995. A professional relationship developed and I became involved in working with Paula and her husband, Howard Bickle, in a research project. Paula secured the position of Principal Investigator for the study and I was contracted to the drug manufacturer, Heyltex as the Safety Monitor. It was originally my intention to relocate to Portland (as I was told by Paula that the IRB required this) to be able to be a part of the project.

In July of 1997, I was in Portland and for the first time had the opportunity to observe how Paula Bickle conducted business at Cascade Health Group. Over a 5 day period I observed practices that were totally unacceptable and that were rejected by her medical director at that time, Dr. Rose Marie Otis, D.O. to include but not limited by the following:

1. Paula Bickle tried to get Dr. Otis to give her standing orders for things she wanted to do that were not acceptable to Dr. Otis.
2. Paula Bickle asked me to do blood draws on patients without a physician's order.
3. New patients were scheduled to see Paula Bickle for nutritional counseling and were being brought to the lab with orders for tests complete with a diagnosis, instructions for completing the mercury research paperwork and orders for medications both oral and IV (hormones, DMPS, IV nutrition, etc). without ever having been seen by a physician in the clinic.
4. Paula would give medical orders to staff members (specifically the R.N., Linda) who would carry them out without the physician's approval.
5. Paula was trying to claim she could operate under standing orders from Dr. Stephen Schaub who had not practiced at the clinic for several months due to a debilitating illness.
6. Paula would countermand orders from Dr. Otis to see all new patients by instructing staff to schedule new patients with her.
7. In the week I was there it seemed that everyone that came into the clinic was being recruited by Paula for the research project regardless of why they scheduled a visit. Several patients told me they felt they were being coerced into the study.
8. There appeared to be a pattern to Paula's evaluations regardless of the patient's complaint or reason they sought to visit Cascade Health Group. The reason was always mercury toxicity.

As a result of my observations, my personal and professional ethics drew me to the conclusion that this study could not go forward with Paula as Principal Investigator. My primary responsibility as Monitor is to insure that the protocol is followed and that patient safety and good clinical practices are adhered to and followed to the letter and to report infractions when patient safety is disregarded. My report to Heyltex on Paula's practices and her direct disregard of the protocol and patient safety led to her being dismissed as the

Exhibit 2

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Principal Investigator of this project. Throughout my association with the Bickles it became increasingly clear that they would take a little truth and wrap it around a lot of untruths while making everything sound believable. This became crystal clear to me during the week I spent in the clinic and questioned various practices and attempted to verify information that I had been previously given. I believe a large part of their motivation is financial in nature with little regard to true quality medical care for individuals or research.

It is my firm belief from this experience and my observations that Paula R. Bickle, Ph.D., will not conform to acceptable protocols and procedures in the medical practice setting. It would appear that she would continue to involve herself in the unlicensed practice of medicine through exceeding her scope of training and practice and overstepping the authority and privileges that are legitimately granted her by a licensed physician. Further, it is my belief, based on direct conversations with Paula, that she does not believe she is subject to the law regarding the practice of medicine as long as she is operating under the veil of "research". She is also quite bewildered that the rest of the world just doesn't understand what she is trying to accomplish for medicine and mankind.

Also of great concern to me is that she is not just impacting patient safety in the Portland community. She conducts training seminars for physicians, dentists and paraprofessionals from all over the US and foreign countries. Some of what she teaches and at least one medical treatment included in the training (at the seminars I attended) to professionals is inaccurate and has the potential for harming the patients of these doctors. This would probably never be traced back to her. She is using reputable professional organizations to gain access to these professionals - that is why they believe she is credible - just like I did in the beginning.

I have read the above statement and find it to be a complete and accurate statement of the facts and truth as I have stated them. I have given this statement freely and voluntarily.

Pam Floener
Pam Floener, Affiant

Subscribed and sworn to before me, the undersigned authority, this the 19 day of January, 1999, to certify which witness my hand and seal.

Carol R. Jeffrey

Notary Public in and for the State of Georgia
My commission expires:

County, Georgia
My Commission Expires Nov. 19, 2000