

Complaint Exhibit B

Affidavit of Dr. Stephen Lamb


AFFIDAVIT OF DR. STEPHEN LAMB

Comes the Affiant, Dr. Stephen Lamb, under oath, and for his affidavit states as follows:

1. Affiant states that he is a board-certified psychiatrist and clinical assistant professor of psychiatry at the University of Kentucky. Affiant states that he has been working in the field of addiction for approximately 24 years.
2. Affiant states that he is a consultant with the Kentucky Board of Nursing where he evaluates and treats impaired nurses. Further, the Affiant is also a consultant with the Kentucky Board of Medical Licensure where he evaluates and assists in rehabilitating certain physicians.
3. Affiant states that he has mentored dozens of practicing physicians in the treatment of opiate dependence and has been participating in medication assisted treatment of opiate dependent patients with methadone since 1991. Further, the Affiant states that he has been using Suboxone and its analogs for office based medication assisted treatment of addiction since 2003.
4. The Affiant states that the evidence for the effectiveness of medication assisted treatment of opiate dependence done by competent physicians on patients who are motivated to adhere to the requirements of a treatment program is overwhelming. Further, when a person with opiate dependence is treated in an abstinence based program the frequency of relapse to street drug use often reaches 90% or more.
5. The Affiant states that he had the opportunity to speak with Stephanie Dawn Watson, a 38-year-old registered nurse who developed opiate addiction and as a result took drug remnants from a biohazardous box at the Highlands Regional Medical Center. Affiant states that Ms. Watson lost her job and charges are pending.
6. The Affiant states that while Ms. Watson is struggling to stay drug-free, at the moment, Ms. Watson is abstinent, however, her risk of relapse is very high and should she relapse she will likely lose her freedom, her career, her family and possibly her life.
7. The Affiant states that if Ms. Watson were allowed medication assisted treatment with Vivitrol, Methadone or Suboxone and if she satisfactorily participated in a treatment program her chances of relapse and its sequelae would very dramatically diminish.
8. The Affiant states that it is medically extremely inadvisable for Ms. Watson to be denied medication assisted treatments given that under her circumstances the chances are greater than 90% that she will relapse to opiates with the treatments.

- 9. The Affiant states that it is his strong recommendation that Ms. Watson be allowed medication assisted treatment.
- 10. The Affiant is aware that in February 2015 Michael Botticelli, the director of the White House's Office of National Drug Control Policy, said that drug courts that receive federal money can no longer ban defendants from using treatments like Suboxone. The Affiant is convinced that the blanket prohibitions banning the use of Suboxone and Methadone by the court system is interfering with the rights of patients to receive proper care from their doctors, and in many cases endangering the lives of their patients, due to the lethal effects of heroin and other opiates.

Further, the Affiant sayeth naught.



 STEPHEN LAMB

STATE OF KENTUCKY

COUNTY OF Fayette

The foregoing document was subscribed and sworn before me by Stephen Lamb to be the truth to the best of her knowledge, this the 9 day of March, 2015.



 NOTARY PUBLIC, STATE AT LARGE

My Commission Expires:

My Commission No. 525123
Expires December 29, 2018

