

1 single behavior, according to the article cited, would be sufficient to qualify Ms. Schiavo for a
2 diagnosis of MCS, made by an examining neurologist.

3 7. If there is any question about clinical interpretation of behavior (i.e. is it "reflexive" or
4 "responsive"), then other objective, supportive testing might be considered. Although this
5 testing is still in its infancy, there is evidence that some MCS patients retain cognitive function
6 despite inability to communicate or follow commands. A *Neurology* article in February of 2005
7 cited, "These findings of active cortical networks that serve language functions suggest that some
8 MCS patients may retain widely distributed cortical systems with potential for cognitive and
9 sensory function despite their inability to follow simple instructions or communicate reliably."


10 8. Swallowing therapy, via a qualified speech therapist, should absolutely be provided in the
11 case where artificial nutrition has been given and the artificial nutrition is being terminated. A
12 speech therapist can provide advice on amounts and consistency of food that will minimize the
13 risk of aspiration.

14 9. Food and water should be offered to patients in the ordinary way in the case where
15 artificial nutrition and hydration are being terminated. Providing food and water in the natural
16 way, by mouth, constitutes "ordinary care" not "treatment." Ordinary, comfort care should
17 always be provided irrespective of instructions regarding "limitation of treatment."

18 10. I would be willing to participate in the matter concerning Terri Schiavo in any way that
19 would be helpful.

20 I declare under the penalty of perjury under the laws of the State of New York that the
21 foregoing is true and correct.

22 Executed this 3rd day of March 2005, in Eden, New York.

23
24 

25 Lawrence Huntoon, M.D., Declarant

Declarant initials: AKH

- 2

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Professional Licensure:

New York Lic. No. 155291
Louisiana Lic. No. 016636
Indiana Lic. No. 01035133 (inactive)

Hospital Affiliations:

Staff neurologist, W.C.A. Hospital, Jamestown, NY 1988 – 2003
Director of Neurology, Goshen General Hospital, Goshen, Indiana 1986 – 1988

Board Certification:

American Board of Psychiatry and Neurology (Neurology) - 1989
Fellow American Academy of Neurology – 1997

Education:

B.A. Grinnell College, Grinnell, Iowa - 1974
(Double Major – Biology and Psychology)

Medical Education:

M.D. Louisiana State University Medical Center New Orleans – 1982
(Medical Scientist (M.D., Ph.D.) Training Program 1976 – 1982)

Post-Graduate Education and Research Experience:

Ph.D. Louisiana State University Medical Center New Orleans – 1980

Major: Physiology (Neurophysiology and electrophysiology)
Minor: Biochemistry (Neurochemistry)

Dissertation: *A Study of Single-Unit Activity in the Substantia Nigra Of Awake Rats During Conditioned Forelimb Movements* – 1980

- Includes:
- a.) Development of a technique for studying single-unit activity in awake rats during conditioned forelimb movements using intracranial self-stimulation depth electrodes.
 - b.) Development of a new type of concentric microelectrode to improve signal to noise ratio.

- c.) Construction of a special stereotaxic atlas of the brain with online statistical probabilities for assessing in vivo location of microelectrode tip.

Medical Post-Graduate Training:

Chief Resident in Neurology - Dent Neurologic Institute, Buffalo, New York – 1985 – 1986

Neurology Resident - Dent Neurologic Institute, Buffalo, New York 1983 – 1985

Medical Intern - Millard Fillmore Hospital, Buffalo, New York 1982 – 1983

Teaching Experience:

Clinical Assistant Instructor Medicine/Neurology, State University of New York At Buffalo – 1982 – 1986

Lecturer and Lab Instructor Neuroanatomy For Medical Students State University of Buffalo At New York - 1985

Graduate Instructor: Positions as listed below
Louisiana State University Medical Center New Orleans
Physiology Department

Lecturer and Lab Instructor – General Physiology Course For Occupational and Physical Therapists

Lab Instructor - General Physiology Course for Medical Students

Lecturer and Lab Instructor - Neuroscience Course For Medical Students
Neuroanatomy Lab Instructor

Medical School Tutor - Neurosciences – for Medical Students

Lecturer - Pathophysiology Course for Graduate Nurses – Neurology Section
Daemen College, Buffalo, New York 1985 – 1986

Special Honors and Awards:

Chancellor's Award for Scholarship, Leadership and Professional Excellence,
Louisiana State University Medical Center New Orleans - 1980

Professional Organizations:

American Academy of Neurology (Fellow)
 Association of American Physicians and Surgeons (AAPS)
 American Medical Association (AMA)
 Medical Society State of New York
 Erie County Medical Society
 Peripheral Neuropathy Institute
 Cleveland Clinic CompreCare Affiliate Program

Professional Offices Held:

President of Association of American Physicians and Surgeons – 1999 – 2000
 Immediate Past President (Officer) AAPS – 2000 – 2001
 Member Board of Directors AAPS - 1996 – 1999
 Member Editorial Board of the *Medical Sentinel* – 1998 – 2002
 Editor-in-Chief of the *Journal Of American Physicians and Surgeons* – 2003 to present
 Member Board of Directors AAPS 2003 – present
 Chairman AAPS Peer Review Committee 2004 - present

Publications:

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- 5.) **AMA Caduceus Speaks with “Forked Tongue”**
- 6.) **Government Fear and Oppression is Profitable**
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- 2.) **Government Looking For Fraud in All The Wrong Places**
- 3.) **Crime Pays If You're An HMO**
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- 14.) **AMA House Of Delegates Acts to Squelch AMA Gag Rule Policy on Free Speech**
- 15.) **Even the AMA is Starting to be Concerned About the Medical Police**
- 16.) **AMA Federal Fraud Enforcement Physician Compliance Brochure**
- 17.) **Indemnity Insurance Cheaper Than HMO Coverage?**
- 18.) **Home Health Care Authorization**
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- 1.) **Tie a Yellow Ribbon Round the Old Oak Tree**
- 2.) **HHS OIG 1999 Work Plan**
- 3.) **Guns and Logos**
- 4.) **Medicare is Running Out of Money**
- 5.) **More Medicare Mischief**
- 6.) **Quantitative Medicare Guidelines for Determining Terminal Status**
- 7.) **AMAP Favors Large Group Practices**
- 8.) **HCFA Announces Indefinite Delay for E&M Guidelines is Over!**
- 9.) **AMA – Don’t Ask...Don’t Tell**
- 10.) **AMA Tiptoeing Back to Individual Coverage**
- 11.) **HCFA Seeks To Gag Physician Communication With Patients**
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- 3.) **Poor Penmanship – New Medicare Scheme to Recoup More Money From Doctors**

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- 1.) **Inflammatory HCFA Notices**
- 2.) **HCFA Bureaucracy Unable to Keep Up**
- 3.) **HCFA Errs... Again**
- 4.) **New Jersey Physicians Reject Clinical Pathways**
- 5.) **Medicare HMOs Breaking the Law**

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- 2.) **Medical Necessity Fraud**
- 3.) **AMA Supports Public-Private Partnerships**
- 4.) **Is The Oath of Hippocrates Outdated?**
- 5.) **HMO Meets RICO**
- 6.) **The Cat and Mouse Game in Medicare Fraud**

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The Gazelle (a poem about sham peer review), L.R. Huntoon, M.D., Ph.D., *Journal of American Physicians and Surgeons*, Vol. 8 No. 3, p. 86, Fall 2003

The Four Cs of Physician Slavery (Editorial), L.R. Huntoon, M.D., Ph.D., *Journal of American Physicians and Surgeons*, Vol. 8 No. 4, p. 101 Winter 2003

MATRIX: A Threat To Medical Privacy? (Editorial), L.R. Huntoon, M.D., Ph.D., *Journal of American Physicians and Surgeons*, Vol. 9 No. 2, p. 36 Summer 2004

Pets Have More Privacy Than People Under HIPAA Guidelines, L.R. Huntoon, M.D., Ph.D., Tri-County Sunday News (Dubois, PA), Dec. 12, 2003

Reviewed and contributed to Chapter 26 **The Neurologic Examination and Diagnostic Carotid Ultrasound** information in: Sapira's Art & Science of Bedside Diagnosis, 3rd edition, edited by Jane Orient, M.D., Lippincott Williams & Wilkins, 2004

Abuse of the "Disruptive Physician Clause" (Editorial), L.R. Huntoon, M.D., Ph.D., *Journal of American Physicians and Surgeons*, Vol. 9 No. 3, p. 68 Fall 2004

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