

UNITED STATES OF AMERICA
EASTERN DISTRICT OF PENNSYLVANIA

Dr. DAVID CHOMSKY, deposes and says:

1. My name is David Chomsky and my office is at 8120 New Second Street, Elkins Park, Pennsylvania 19027. I am over 21 years of age and fully competent to make this affidavit.

2. I am a board certified internal medicine specialist (a medical doctor) with a subspecialty in cardiology. I have performed cardiac catheterizations both at Albert Einstein Hospital in Philadelphia and at Deborah Heart Hospital in New Jersey.

3. I have been told that Mr. Saifullah Paracha is a 59 year-old-man with a history of two heart attacks and with a family history of heart problems. I understand that he has been suffering recurring chest pains for some time now. I am further told that the doctors who have examined him have recommended that he undergo cardiac catheterization. I have never seen Saifullah Paracha and I can express no independent opinion about his condition.

4. In my opinion, cardiac catheterization should never be done outside of a fully-equipped catheterization laboratory.

5. In my opinion, cardiac catheterization should never be done away from a hospital ready to do cardiac surgery. There is a small but tangible risk of complications which can require emergency surgery to save the patient.


6. In my opinion, it is not medically advisable to do exploratory cardiac catheterization without the equipment and skill to do whatever remedial work turns out to be indicated, such as balloon angioplasty, placement of stents, etc., as part of a single procedure.

7. Studies have shown that the success of a cardiac catheterization is closely related to the number of catheterization procedures that the catheterization team has performed. That is, success is closely related to the team's experience performing this procedure.

8. I am not familiar with the medical facilities at Guantanamo. Since the base serves only a few thousand active duty military people, not a group at risk for cardiac problems, I assume there is no catheterization lab there. I also assume that it is unlikely that cardiac catheterizations are performed there frequently.

9. If Saifullah Paracha or anyone else at the base needs a cardiac catheterization, it should be done at a properly equipped hospital, such as Bethesda Naval Hospital, rather than at a military base hospital with no catheterization lab and without doctors experienced in performing that procedure.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 8, 2006.



DAVID CHOMSKY