

AFFIDAVIT OF DR. LAWRENCE "LARRY" TROMBKA

STATE OF OKLAHOMA)
)
) ss.
COUNTY OF OKLAHOMA)

Dr. Lawrence "Larry" Trombka, a person of lawful age, being duly sworn, under penalty of perjury do state as follows:

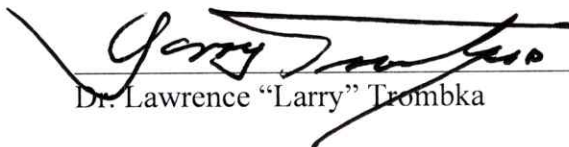
1. I received my medical license in 1987. I graduated from medical school and did a four-year residency in psychiatric services. I am a licensed psychiatrist by the state of Oklahoma. I have worked for the Department of Corrections providing psychiatric and mental health services for inmates at various jails and prisons in the state of Oklahoma.
2. In 1997-1998, I was the sole psychiatrist at the Oklahoma County Jail providing psychiatric and mental health services to the inmates. I would visit the jail once a week.
3. At the time that I worked at the Oklahoma County Jail in the late 1990s, lithium was a first line drug used to treat patients diagnosed with bipolar disorder.
4. I have reviewed Attachment A, which is entitled "Oklahoma County Sheriff's Office Medical Information Sheet."
5. Based on this document and my knowledge from working at the Oklahoma County Jail, this form is documenting that inmate Justin Sneed was going back to the Department of Corrections on July 8, 1998.
6. Based on my knowledge and experience working at the Oklahoma County Jail, the Jail would have had a file with Mr. Sneed's medical records. This file would contain my notes and diagnosis, as well as any medication I prescribed for Mr. Sneed's treatment. The Oklahoma County Jail maintained these records and I did not keep my own copy. At that time the Jail was run by the Oklahoma County Sheriff's Department.
7. Based on my knowledge and experience working at the Oklahoma County Jail, I was the only medical health professional who would have ordered Mr. Sneed to be prescribed

lithium, as it would need to have been ordered by a physician or psychiatrist. Nurses could administer the drug but only a physician could have ordered the lithium as a prescription.

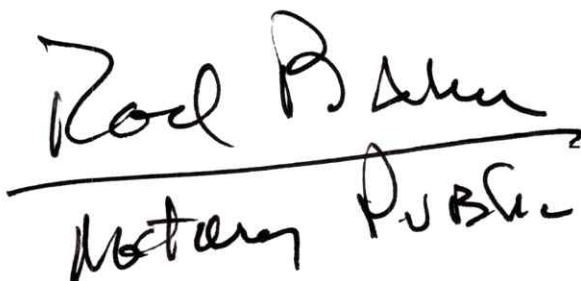
8. Dr. Charles Harvey was another medical doctor also working at the Oklahoma County Jail who had a medical clinic at the Jail in 1997 but he was not a psychiatrist. I recall that he would not prescribe lithium or any similar psychotropic drug as he was only a medical doctor and not trained in psychiatry, but rather would refer the patient to me for evaluation.
9. Based on my medical training and experience, the use of lithium was not and has not been indicated for dental issues. Rather it is a psychotropic drug used for mental health disorders, like bipolar disorder. Lithium would also not be prescribed for a cold or confused by medical health professionals with Sudafed.
10. Based on my training and experience, bipolar disorder symptoms can be exacerbated by illicit drug use, such as methamphetamine. That is, methamphetamine can make individuals with bipolar disorder feel euphoric, like they are manic. In addition, the manic episode may cause an individual to be more paranoid or potentially violent. The manic episode would last only for a few days when the individual is coming off the methamphetamine.
11. A manic episode could also affect an individual's perception of reality as well as their memory recall.
12. It was my experience that when a competency evaluation is conducted by a State psychologist, like Dr. Edith King, she would have access to the inmate's medical records maintained by the Jail.

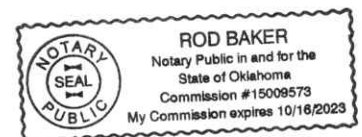
I swear upon penalty of perjury that the statements in the foregoing two pages are true and accurate to the best of my knowledge and recollection.

Further, Affiant sayeth naught.


Dr. Lawrence "Larry" Trombka

Subscribed and sworn before me on this 17th day of March, 2023.


Notary Public



OKLAHOMA COUNTY SHERIFFS OFFICE

MEDICAL INFORMATION SHEET

INTAKE NUMBER: IN97502547 NAME: SNEED, JUSTIN BLAYNE

DOB: 09/22/77

DATE IN CUSTODY: 01/17/97

DATE TRANSFERRED: 07-08-98

GENERAL BEHAVIOR: FAIR

MEDICAL PROBLEMS: BI-POLAR

ALLERGIES: NKDA

MEDICATIONS: PREVIOUS USE OF LITHIUM

REMARKS: USE UNIVERSAL PRECAUTION DURING TRANSPORT

MEDICAL SIGNATURE: 