

## **STATEMENT OF REGINA LINARES**

For 17 years, I worked at Salinas Valley Memorial Hospital. I scheduled hospital surgeries and procedures. I loved my job. I loved working with the hospital staff, the nurses, the technicians, and the doctors. I thought what we were all doing was our very best to provide the best possible patient care to the people who came to the hospital, and who desperately needed our help.

But on October 21, 2016, all that changed. I, myself, was in need of patient care from Salinas Valley Memorial Hospital. I came to the hospital because I was diagnosed with a heart condition. I was told I'd failed a stress test, and that I would need a cardiac catheterization procedure.

I was wheeled into the Cath Lab at about 3:15 p.m. There was a nurse and two technicians in the Lab who moved me from the hospital bed to the table in the room. They told me the cardiologist, Dr. Robert Wlodarczyk, would be there shortly. The consent I had signed was for a different doctor to do the procedure, but they said he was two hours away. So, I agreed to have Dr. Wlodarczyk perform the angiogram. Then Dr. Wlodarczyk showed up and the nurse began administering the anesthesia.

As I started coming to from the anesthesia, I remember Dr. Wlodarczyk's face extremely close to me, just a few inches from my face. I found this to be very disturbing. I remember saying something wasn't right. I remember the staff telling me if I had problems to come back to the hospital. I remember being wheeled to the heart center. There was my fiancée, my sister and my mom, and I remember telling them something didn't feel right.

Two and a half weeks, later, on November 7 at about 6 pm I received a call from Lea Woodrow, Senior Administrative Director of Risk, at Salinas Valley Memorial Hospital. She said she had me on speaker phone and in the room with her was Stephanie. She asked if I had someone with me and I told her no. My fiancée was in LA on business. She asked me if I could tell her what I remember about my procedure. I told her everything I could remember, including the part of Dr. Wlodarczyk's face being close to mine. She proceeded to tell me that the staff in the room at the time had filed an incident report with the hospital. They had witnessed Dr. Wlodarczyk's hands on my breasts and there was no need for his hands to be on my breasts period. She said, that the Medical Executive board was aware of this and they were taking these allegations seriously. I started crying, I felt humiliated and embarrassed and angry. She told me that none of this was my fault. She asked if I needed someone to speak with that she was here for me, no matter what I decided to do. She asked that I call someone to be with me, I told her I would be alright. She said she would come and see me in my office on November 8th to discuss this further and to see if I was alright.

When I met with Lea on November 8, she said the Cath lab staff had been investigated and all the staff were talking about this. I said to her, everybody in the Cath lab knows? She said, you know how it is staff talking, and was using the talking sign with her hands. I started crying again, stating how embarrassed I was. I couldn't believe it. I was mortified. She just reiterated once again that this was not my fault and everything would be okay.

On November 9, I spoke with Lea again, I asked her what my rights were as a patient that had been battered/assaulted and what was the hospital's obligation to me as

a patient that has been battered/assaulted. The attitude at that point changed and she said the hospital has done its due diligence by informing me of what had happened. The Medical Executive Board and Senior Administration knew of what had happened and that there were only two witnesses to what had happened. She said that she was meeting with the legal team this afternoon and she was pretty sure this case would be closed by days end. I asked if I was going to be able to speak with the legal team, and I don't remember what she said. At that point I spoke with my boss and let him know I needed time off, to seek counseling and to get my emotions in check, because I wasn't sure I could see Dr. Wlodarczyk in the hallway and not say anything to him.

Regarding the two witnesses, a nurse and a technician, I have something important to say to them. I want to thank both of them from the bottom of my heart for having the courage to come forward and report what Dr. Wlodarczyk did. Like me, Salinas Valley Memorial Hospital is their employer too. I know how hard this has all been for me, and I am certain that the decision to step forward and tell the truth was a very difficult one for them as well. Without their courage, I would probably never have known that Dr. Wlodarczyk sexually assaulted me when he thought I was unconscious and defenseless. The kind of doctor who would do something like this to his own patient – well, I can't imagine what sort of physician would do a thing like that. But it's only because of the bravery of these two other female employees of the hospital that I have the courage to attempt to hold Dr. Wlodarczyk accountable for what he has done.

Now I have something more to say about the hospital. When I finally returned to work at the hospital on about November 7, my job required me to have continuing contact with Dr. Wlodarczyk, including hearing him paged over the hospital loud speaker as well

as personal encounters. When I complained to the hospital managers about how uncomfortable I was around him, I was told I should not look at him and walk the other way. When I objected that it did not seem fair that as a victim, I was being asked to change my conduct, the response was, “Are we going to have a problem?”

Then I learned that on November 10, after I returned to work, and after the hospital was aware of the potentially criminal misconduct of Dr. Włodarczyk, his privileges as a physician at the hospital were renewed!

Ultimately, the hospital refused to provide me with what I believed were reasonable accommodations to allow me to continue my secretarial scheduling work. As a result, my work environment became simply intolerable. I felt betrayed by the hospital, my employer. I felt I had no choice but to quit my job of 17 years.

While it took almost a year for the District Attorney’s office to file charges against Dr. Włodarczyk, I am pleased that that has happened and that he is being prosecuted for his crime. I have also filed a lawsuit against him and against Salinas Valley Memorial Hospital and its management for allowing this man access to patients like myself who he could victimize. I am also obviously concerned that they continued to allow him to practice medicine at the hospital, exposing other women to him, and that the hospital – from my perspective – did little or nothing to protect me from a truly hostile work environment in the aftermath of Dr. Włodarczyk’s sexual assault on me.

I never imagined that at this point in my life, I would be one of the women to say #METOO. Hopefully, publicizing my experience will prevent the victimization of any other women who are patients of Dr. Włodarczyk at Salinas Valley Memorial Hospital.

Hopefully, my lawsuit and the women employees of the hospital who came forward as witnesses to Dr. Wlodarczyk's actions will convince Salinas Valley Memorial Hospital to protect both its employees and patients with better care in the future.

Thank you for coming. My lawyers can take your questions.