

### Dr. Kaufman's Testimony

Dr. Kaufman is Board Certified in Psychiatry by the American Board of Psychiatry and Neurology. His testimony will be based on Dr. Kaufman's training and experience, most specifically his experience as Ms. Binette's treating psychiatrist. His proposed expert testimony is summarized in a letter he wrote to Disciplinary Counsel, on September 8, 2017<sup>1</sup> (Exhibit DC-1)

Dr. Kaufman's testimony is expected to consist of the observations and opinions he made in his letter September 8 letter:

- Dr. Kaufman has been treating Pamela Binette for a "mental health disorder" known as Post-Traumatic Stress Disorder (PTSD) "since prior to 2012" - the year Ms. Binette worked for Respondent. (DC-1, pp.1-3)
- Dr. Kaufman is expected to testify that Ms. Binette has "a history of adult and childhood trauma that makes her vulnerable to being re-traumatized when exposed to triggering events." He is expected to testify further that in his opinion, "this is what happened" in early September 2017 when she continued to face the prospect of "revisiting the history of what was a traumatic experience" at a deposition scheduled by Respondent for September 12, 2017. DC-1, p.1
- Dr. Kaufman is expected to testify further that that when he spoke to Ms. Binette in early September 2017 "she expressed self-harm thoughts and impulses" and that "her history does include acts of self-harm so I take such concerns very seriously." Id.
- Dr. Kaufman is expected to testify from his recollection and his "review to some extent, of prior medical records", that in 2012, Ms. Binette "was initially pleased to be working for an attorney (Respondent), then after some weeks expressed increasing distress as her experience at work seemed to trigger symptoms significantly." DC-1, p.2
- He is expected to testify further that "the basis of (his) understanding lies in what is known about Post Traumatic Stress Disorder (PTSD) and the role triggering events play in causing an exacerbation of symptoms which I believe occurred while at work at that time." Id. (emphasis added)
- Dr. Kaufman is expected to testify further that when Ms. Binette's PTSD is in "remission" Ms. Binette could perform at normal levels at work; but, that "when symptomatic" PTSD "can impair executive functions such as decision making." DC-1, p. 3

Dated at Burlington, Vermont on October 13, 2017

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Robert V. Simpson, Jr.  
Disciplinary Counsel

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<sup>1</sup> Disciplinary Counsel provided the letter to Attorney McGee on September 12, 2017 as Discovery Exhibits U. It is attached as Exhibit DC-1.