

**STATE OF MINNESOTA**  
**COUNTY OF HENNEPIN**

**DISTRICT COURT**  
**FOURTH JUDICIAL DISTRICT**

STATE OF MINNESOTA,

Plaintiff,

**AFFIDAVIT OF ALEAH MARTAGON**

vs.

Court File No. 27-CR-20-12949

TOU THAO,

Defendant.

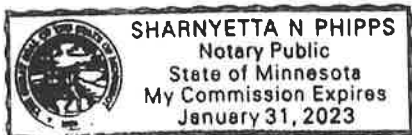
STATE OF MINNESOTA            )  
  ) SS.  
COUNTY OF HENNEPIN        )

Aleah Martagon, being first duly sworn on oath, deposes and states as follows:

1. I am employed as the HIM (Health Information Management) Operations Manager at Hennepin Healthcare System, Inc. a/k/a Hennepin County Medical Center ("HCMC").
2. HCMC uses Epic, a computer program used to create and manage medical records. I am trained in the use of Epic.
3. Epic automatically logs instances of patient record access and revision history in the Patient Audit Trail. This feature of the medical records program always remains on and allows HCMC to search for medical record access by revision history.
4. Epic uses audit trails to monitor user's access and creation of patient data and ensures that the information within the medical records is accessed for authorized reasons. The Epic Patient Audit Trail Report is system generated and accurate. I have been trained how to use and analyze the Epic auditing feature.
5. I performed an audit report on the revision history of Mr. George Floyd's medical records between May 25, 2020 and January 25, 2021.
6. HCMC's legal team provided me with the list of those known to have inappropriately accessed Mr. Floyd's medical record between May 25, 2020 and January 25, 2021.

- 7. I compared the list of individuals provided by legal and the Epic audit report and found that none of the individuals who inappropriately accessed Mr. Floyd's medical record modified the medical record in any way.

Further, Affiant sayeth naught.



*Aleah Martagon*  
 Aleah Martagon

Subscribed and sworn to before me  
 on January 27, 2021.

*Sharnyetta N Phipps*  
 Notary Public