

STATE OF SOUTH CAROLINA)	SIXTEENTH JUDICIAL CIRCUIT
)	
COUNTY OF YORK)	COURT OF GENERAL SESSIONS
)	
STATE OF SOUTH CAROLINA,)	2009-GS-46-2695
)	2009-GS-46-2696
Prosecution,)	
vs.)	
)	
TAYLOR DURDEN,)	
)	
Defendant.)	AFFIDAVIT OF JAMIE CHESSLER
)	

COMES NOW THE AFFIANT SWORN AND STATES THE FOLLOWING:

1 1. My name is Jamie Chessler. I am 29 years old. I received my bachelor's
2 degree in biology from the University of Buffalo, and my MD from the Baylor College of
3 Medicine. I have been in South Carolina for the last two years, since finishing my
4 residency requirements. I won awards at Baylor for top marks in the anatomical
5 pathology specialty, and graduated third in my class over all. I am a board certified
6 physician, and licensed in the State of South Carolina through the SC Department of
7 Labor, Licensing and Regulation (LLR). I have certifications in internal medicine as well
8 as anatomical pathology. I serve as an assistant medical examiner for the State of
9 South Carolina, and handle cases from the various coroner's offices that call on us.
10 I have seen all of the usual causes of death, from drowning to shootings, stabbings, and
11 of course auto fatalities.

12
13 2. The morning of August 30, 2009, we received a body from the York County
14 Coroner's Office. The body was a caucasian female, giving all outward physical
15 appearances of an older teenager. Per the positive identification of the Daniel Morgan
16 University Police Department, the body was identified as Jessica Bateson, 19 years of
17 age, of Aiken, South Carolina. Per the records from the emergency room physician, she
18 arrived at the emergency room in an unresponsive state with fixed, dilated pupils and
19 shallow, labored breathing. Time of death was 18:40 on Saturday, August 29, 2009.

20
21 3. The autopsy was conducted at 10:00 on Monday, August 31, 2009. Upon
22 physical examination of the body, the only marks of external trauma visible were

23 consistent with a fall from intermediate height. The only external markings upon the
24 body were red nail polish on toes and fingers, and a tattoo of a cherub with an arrow
25 through its back located on the outside of her right ankle. This was noted in the autopsy
26 filings. Weight of the body was 131lbs, 5oz; length 70 inches. The body was dressed in
27 a white t-shirt and tan shorts. There was no indication that the body had been dressed
28 or that clothing was altered post mortem.

29

30 4. Through the course of the autopsy, all organs appeared unremarkable in
31 coloration, size, and weight, with the exception of a distended bladder, and an extremely
32 swollen brain stem. I determined the cause of death was swelling of the brain stem due
33 to consumption of a lethal amount of water. This is known as acute hyponatremia.

34

35 5. There are cases of hyponatremia in the United States every year. The vast
36 majority of fatal hyponatremia cases occur in infants and the elderly. To say it is strange
37 that a teenager would die of this would be an understatement. I have never seen a
38 fatality from hyponatremia before this case. I have read about it in the medical textbooks
39 and I am familiar with the symptoms and the physiological affects. Hyponatremia is a
40 painful way to die. Picture drinking so much fluid that your kidneys cannot keep up and
41 you cannot relieve the fluid from your system to the point that you literally drown in your
42 own cells. When the urinary system cannot flush the excess fluid from the body, the
43 cells all begin to absorb the excess fluid. Some cells absorb water until they burst, and
44 can actually cause the victim to appear to have blotchy skin from all the burst cells.
45 Usually in conjunction with that is the swelling of the brain stem. This is particularly
46 dangerous because if not counteracted, coma and ultimately death occur. Among other
47 things, the brain stem controls consciousness, breathing, heart beat, eye movements,
48 pupil reactions, swallowing and facial movements. Furthermore, all the sensations going
49 to the brain, as well as the signals from the brain to the muscles, must pass through the
50 brain stem. Without a clear path for these signals to pass back and forth from the brain,
51 it is as if the head had been chopped off.

52

53 6. Upon checking the sodium serum levels, which indicates water consumption,
54 the numbers were off the charts at the low end of the scale. This merited further
55 urinalyses and blood work. Following the results of those tests, I came to the

56 conclusion that such massive water consumption could not have been voluntary. Ms.
57 Bateson died as a direct result of human intervention.

58

59 7. The death certificate notes the cause of death as acute hyponatremia, along
60 with confirmation of homicide as opposed to natural causes. It is unlikely that the
61 condition was accelerated or exacerbated by any other factors. I later found out that
62 after my homicide ruling and the autopsy, that the DMU Police Department investigated
63 further the circumstances of Ms. Bateson's death. Taylor Durden and Alex Richards
64 were held responsible with Taylor Durden ultimately charged.

65

66 8. I understand that Dr. Paulsen is testifying for the Defense and disagrees with
67 my conclusion. While I have the utmost respect for Dr. Paulsen, I believe that medical
68 advances in the field of pathology have passed him/her by. In addition, I attended
69 medical school with Dr. Paulsen's son, who later lost his license to practice medicine
70 due to a drug conviction. Over the years, I had on many occasions spoken at length
71 with Dr. Paulsen about the practice of medicine and have been dismayed that his/her
72 focus has turned from service to the public to the financial rewards of being an expert
73 witness, or "a hired gun."

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time.
The material facts are true and correct.

Signed,

Jamie Chessler

Jamie Chessler

SIGNED AND SWORN to me before 8:00a.m. on the day of this round of the 2010
South Carolina Mock Trial Competition.

C.M. McCormack

C.M. McCormack, Notary Public

State of South Carolina

My Commission Expires: 07/25/16