

1 Q. All of these things we've been talking about  
2 improper injection practices. Improper scope cleaning,  
3 improper hand washing and glove misuse, reusing biopsy  
4 equipment, reusing bite blocks, et cetera, are these  
5 all substandard medical practices?

6 A. Yes.

7 Q. That could result in the spread of diseases  
8 between patients?

9 A. Yes.

10 And were all these improper medical practices  
11 things that you and your team actually saw with you  
12 eyes?

13 A. With the exception of the reuse of the biopsy  
14 equipment, yes.

15 Q. These medical practices were not hidden from  
16 you?

17 A. No, they were not.

18 Q. Okay. And did they occur right in front of  
19 you when the healthcare professionals knew you were  
20 watching?

21 A. Yes.

22 Q. Okay. In addition to observing procedures,  
23 did you and the investigation team interview ECSN  
24 healthcare providers and staff as well?

25 A. Yes, we did.

1 A. That's correct.

2 Q. Okay. So let me ask you: How long did it  
3 take you and your team to observe the infection control  
4 problems? was it on that -- that first and second day  
5 you actually observed procedures and observed what was  
6 going on in the clinic?

7 A. The first one I noticed would have been the  
8 first time I stepped into the room and saw the  
9 CRNA Hubbard not wearing two gloves.

10 Q. All right. So the first time you observed  
11 these infection control practices was the first time  
12 you stepped in the room at the clinic, right?

13 A. Yes.

14 Q. Okay. It didn't take you two years, by the  
15 time you wrote your report, for you to be able to  
16 observe these infection control -- or these substandard  
17 infection control practices, right?

18 A. That's correct.

19 Q. Okay. So if someone were to suggest that an  
20 investigation of the clinics would not have revealed  
21 the breaches of infection that you saw and your  
22 team saw, would that be correct?

23 A No. Our investigation did find those  
24 problems.

25 Q. Okay. You would agree with me that -- that --