

BY MR. KEMP:

- Q. More specifically, you didn't know that Dr. Cohan had documented false advertising cases, false medical documents, charging for services not rendered, altering medical records, lack of care and diligence. You didn't know that Dr. Cohan had documented this in the 1990's before you went to the endoscopy center, right?
- A. I did not know that.
- Q. And assuming for the sake of argument that Dr. Cohan had a meeting with HPN contracting or HPN administrators, you would expect them to – to forward this type of material to the appropriate entity at HPN, right?
- A. I would certainly hope they would.
- Q. Well, you would expect them to.
- A. I would expect them to, yes
- Q. And you'd also expect whoever got this type of material to send it to the medical director, correct?
- A. To research it and verify it, and then if necessary – if appropriate, send it to the medical director.
- Q. Now, if you had known about the Cohan investigation, you would not have gone to ECSN, correct?
- A. If I had know about – if I had known that these allegations were true, then I would not have gone to the – to the colonoscopy center.
- Q. Now, assuming that someone at HPN met with Dr. Cohan and heard some of this information from him prior to your 2005 operation and they didn't do anything, that would upset you, right?
- A. Yes, sir.
- Q. Upset you a lot, because HPN has exposed you to potentially getting hepatitis.
- A. That would be true, sir.