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1 A. It does say that.
2 Q. So wouldn't it be assumed they didn't
3 find anything wrong, or do you think they found
4 something wrong and just chose to honor my
5 request?
6 MR. CHABOT: Objection, foundation.
7 MR. KAPLAN: Objection, foundation.
8 A. I can't really say.
9 Q. So you think it's possible that they
10 determined against me but chose not to tell
11 anyone?
12 MR. CHABOT: Same objection.
13 A. I'm not familiar with their policies
14 or procedures regarding the application
15 requirements.
16 Q. If they agreed with my interpretation
17 of the two settlement agreements, would you
18 believe that you were wrong on your termination
19 letter regarding USC?
20 MR. KAPLAN: Note my objection.
21 A. I think that the USC information was
22 in line with other previous concerns about
23 lying, but again, was not found out until

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1 significantly after the decision was already
2 made.
3 Q. But you do have to answer the
4 question. Do you think you were wrong on the
5 USC matter and the termination letter if
6 indeed ERAS agreed with interpretation of the
7 settlement?
8 MR. KAPLAN: I'm going to object to
9 the question because it calls for a conclusion
10 I don't believe this witness is qualified to
11 make, but you can go ahead.
12 A. I think the general omission was the
13 concern. It was never specific to the USC
14 complaint.
15 Q. I'll rephrase the question. Is ERAS
16 or is AAMC the administrator for ERAS? Do they
17 have authority over their service?
18 A. I don't know.
19 Q. Don't they have an investigation unit
20 called ERAS Investigations?
21 A. I don't know.
22 Q. So would you trust, if they do have an
23 investigation unit, would you trust their

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1 decisions?
2 A. Yes.
3 Q. So if they decided that there was no
4 problem with USC on my application, would your
5 statement on the termination letter be wrong?
6 MR. CHABOT: I'm going to object to
7 the question for the reasons stated by Attorney
8 Kaplan earlier.
9 A. What was the question?
10 Q. I'll just repeat it.
11 (The record was read as requested.)
12 MR. CHABOT: Did you get that, Dr.
13 Finn?
14 A. I guess I'm still not clear what
15 statement you're referring to, the statement,
16 that that together with the other concerns.
17 Q. So you enumerated certain items in
18 the termination letter. One of them was you
19 failed to disclose USC Keck on your ERAS
20 application. So there's that statement which
21 is an enumerated cause of termination among
22 about six others. But that statement is what
23 I'm referring to. And we can go back and look,

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1 but that statement, if ERAS investigations
2 determined differently, would you say you were
3 wrong or would you disagree with ERAS?
4 MR. CHABOT: Hypothetically speaking?
5 Q. I don't think it's hypothetical. She
6 just doesn't know who ERAS investigations is,
7 but it's not really hypothetical.
8 MR. CHABOT: That's also not what the
9 document says. Just note my objection.
10 MR. KAPLAN: Note my objection as well.
11 Q. Well, I don't think it's a
12 hypothetical, but if that's how she wants to
13 answer it.
14 A. It's hypothetical in the sense that
15 this information was not available to me at
16 that time.
17 Q. I'm saying now. Now if you agree that
18 they made that determination but you don't seem
19 to know but if that was proven to you, would
20 you then believe your letter, that enumerated
21 item was wrong or would you think they were
22 incorrect, ERAS?
23 MR. CHABOT: Objection to the form of