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# Exhibit G-1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA and  
STATE OF MICHIGAN,

Plaintiffs,

-vs-

Case No. 15-CV-12311

HILLSDALE COMMUNITY HEALTH CENTER,  
WA FOOTE MEMORIAL HOSPITAL, et al,  
Defendants.

/

VIDEOTAPED DEPOSITION

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

DEPONENT: DUKE ANDERSON - VOLUME I

DATE: Thursday, June 30, 2016

TIME: 10:00 a.m.

LOCATION: DICKINSON WRIGHT, PLLC

350 South Main Street, Suite 300

Ann Arbor, Michigan

REPORTER: Karen Fortna, CRR/RMR/RPR/CSR-5067

VIDEO: Jane McMillan

JOB NO: 2776

Thursday, June 30, 2016

Ann Arbor, Michigan

10:00 a.m.

\* \* \*

VIDEOGRAPHER: We are now on the record.

The time is ten a.m. on Thursday, June 30, 2016,  
for the deposition of Duke Anderson. We are taking  
this deposition at 350 South Main in Ann Arbor,  
Michigan, in the action entitled United States of  
America versus Hillsdale. This is Case  
No. 15-CV-12311.

My name is Jane McMillan and I'm a  
certified legal video specialist from Fortz Legal  
Support, LLC.

Would the court reporter please swear in  
the witness and the attorneys briefly identify  
themselves for the record.

\* \* \* \*

DUKE ANDERSON,  
having first been duly sworn, was examined and  
testified as follows:

MR. DYER: James Dyer, counsel for  
non-party witness, Duke Anderson.

MS. ROUSE: Katrina Rouse for the United  
States.

1 build his practice, build up, and then's gone.

2 Q. Aside from Dr. Corcoran, did Allegiance tell you  
3 what plans they had for marketing Allegiance  
4 services in Hillsdale County?

5 A. No.

6 Q. Did you sometimes tell Allegiance when Allegiance  
7 had done marketing in Hillsdale County that you did  
8 not like?

9 A. Yes.

10 Q. When?

11 A. There was -- the relationship -- I'll step back.  
12 The relationship between the two facilities, which  
13 I found when I started the job, it was not a good  
14 trusting relationship.

15 Even in my deposition, there was some  
16 allusion to what happened in 1999. Actually, I  
17 didn't know definitively what happened in 1999  
18 until this late process and I saw an article in the  
19 Jackson Citizen Patriot from 1999, and if I had  
20 ever seen that -- I didn't remember seeing that  
21 article -- but it showed a very tense, a very  
22 untrustful relationship of, "Allegiance are  
23 predators and we've got to do everything we can to  
24 keep them out."

25 Now did I sense there was some mistrust?

1 STATE OF MICHIGAN)

2 COUNTY OF OAKLAND)

3  
4 Certificate of Notary Public

5 I do hereby certify the witness, whose attached  
6 testimony was taken in the above matter, was first duly  
7 sworn to tell the truth; the testimony contained herein  
8 was reduced to writing in the presence of the witness, by  
9 means of stenography; afterwards transcribed; and is a  
10 true and complete transcript of the testimony given. I  
11 further certify that I am not connected by blood or  
12 marriage with any of the parties, their attorneys or  
13 agents, and that I am not interested directly, indirectly  
14 or financially in the matter of controversy.

15 In witness whereof, I have hereunto set my hand  
16 this day at Royal Oak, Michigan, State of Michigan.

17 I hereby set my hand this day, July 3, 2016.  
18

19  
20   
21

22 Karen Fortna, CRR/RMR/RPR/CSR-5067

23 Notary Public, Oakland County, Michigan

24 My Commission expires 4/30/2019  
25