



STATE OF RHODE ISLAND  
OFFICE OF THE ATTORNEY GENERAL

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*Peter F. Neronha*  
*Attorney General*

June 11, 2021

***Via Electronic Mail Only***

Patricia Rocha, Esq.  
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***Re: Hospital Conversion Initial Application of Chamber Inc.;  
Ivy Holdings Inc.; Ivy Intermediate Holdings, Inc.; Prospect Medical Holdings, Inc.;  
Prospect East Holdings, Inc.; Prospect East Hospital Advisory Services, LLC; Prospect  
CharterCARE, LLC; Prospect CharterCARE SJHSRI, LLC; Prospect CharterCARE  
RWMC, LLC (the “Transacting Parties”)***

Dear Attorney Rocha:

Pursuant to Rhode Island General Laws § 23-17.14-32, the Office of the Attorney General has reviewed your request for confidential status for certain testimony given by Joseph DiStefano and Edward Quinlan at their Statements Under Oath on November 9, 2020 and January 7, 2021 respectively, in the above-referenced matter. The Attorney General has determined that the testimony identified in the enclosed Exhibit As will be deemed confidential at this time for the reasons stated therein.

In the event any testimony shall lose confidential status, the Attorney General may deem the testimony public.

Sincerely,

*/s/ Jessica Rider*

Jessica Rider  
Special Assistant Attorney General  
Health Care Advocate  
[jrider@riag.ri.gov](mailto:jrider@riag.ri.gov)

JDR/dbm  
Enclosure

cc: Leslie D. Parker, Esq., Adler Pollock & Sheehan P.C.  
Jacqueline Kelley, Esq., Legal Counsel, RIDOH  
Michael Dexter, Chief, Center for Health Systems Policy & Regulation, RIDOH  
Fernanda Lopes, Chief, Office of Health Systems Development, RIDOH

**Exhibit A**  
**Prospect/Chamber Inc. & Ivy Holdings, Inc.**  
**Office of the Attorney General**  
**Confidential Determinations for Transcript of**  
**Statement Under Oath of Joseph DiStefano on**  
**November 9, 2020**

<b>Location</b>	<b>Description</b>	<b>Determination</b>	<b>Basis of Designation</b>
14:13-19	Confidential medical information.	Confidential	Personal identifiable information, disclosure of which would constitute a clearly unwarranted invasion of privacy.
19:4-14	Discussion of salary and income.	Confidential	Confidential financial and personally identifiable information.
48:3-48:5, 48:23-49:23, 50:10-56:10, 60:2-60:18, 61:1-64:10, 65:24-67:4	Discussion of Conflict of Interest Form. Discussion of PCC formation and 2014 transaction.	Confidential	Confidential commercial information.
73:19-75:20	Discussion of Conflict of Interest Forms required by the PCC Board of Directors.	Confidential	Confidential commercial information.

83:14-22	Discussion of Leonard Green.	Confidential	Confidential commercial information.
84:8-85:18	Discussion of PCC Board's knowledge of proposed transaction.	Confidential	Confidential commercial information.
87:24-90:1	Discussion of PCC Board's control over hospital expenditures.	Confidential	Confidential commercial information.
94:7-21	Discussion of non-emergency capital improvements.	Confidential	Confidential commercial information.
98:18-24	Discussion of dividend payments.	Confidential	Confidential commercial information.
100:20-103:13, 104:13-111:25, 112:20-113:6	Discussion of PCC Board and PMH finances.	Confidential	Confidential commercial information.
102:20-111:13	Discussion of quality at Rhode Island Hospitals and PCC Board's role in quality oversight.	Confidential	Confidential commercial information.

112:1-113:6	Discussion of lawsuits.	Confidential	Confidential commercial information.
117:13-118:23, 120:11-123:23	Discussion of vendor payments. Discussion of relationship between labor and management at Fatima. Discussion of PCC Board's role in COVID response.	Confidential	Confidential commercial information.
128:14-128:17, 128:25-129:8	Discussion of personal finances. Discussion of PMH's role in income of Rhode Island hospitals.	Confidential	Confidential commercial information.
130:14-132:9	Discussion about PCC Board of Directors. Discussion about Prospect CEO position.	Confidential	Confidential commercial information.
135:1-136:13, 136:25-140:6	Discussion about PCC Board of Directors.	Confidential	Confidential commercial information.
147:20-149:9	Discussion of PCC Board's role in hospital supplies and policies.	Confidential	Confidential commercial information.
151:4-153:12	Discussion of Catholic influence at Fatima. Discussion of leadership retention.	Confidential	Confidential commercial information.

155:14-20	Discussion of sale-lease back.	Confidential	Confidential commercial information.
158:22-159:18	Discussion of PCC Board's role with respect to COVID-19 protocols.	Confidential	Confidential commercial information.

**Exhibit A**  
**Prospect/Chamber Inc. & Ivy Holdings, Inc.**  
**Office of the Attorney General**  
**Confidential Determinations for Transcript of**  
**Statement Under Oath of**  
**Edward Quinlan on January 7, 2021**

<b>Location</b>	<b>Description</b>	<b>Determination</b>	<b>Basis of Designation</b>
14:2-6	Confidential medical information.	Confidential	Personal identifiable information, disclosure of which would constitute a clearly unwarranted invasion of privacy.
27:8-31:23, 32:4-32:10, 32:15-34:16, 34:21-43:3, 46:22-46:25, 47:8-48:25, 49:20-51:18, 52:12-60:8, 61:14-63:19	Discussion of PCC Board of Directors, reimbursement rates to hospitals, and PMH funding of RI Hospitals.	Confidential	Confidential commercial and/or proprietary information.
71:10-74:3, 74:18-75:10	Discussion of 2014 HCA Decision with respect to PCC Board of Directors.	Confidential	Confidential commercial and/or proprietary information.
76:25-77:21, 78:3-78:11	Discussion of 2014 LLC Agreement.	Confidential	Confidential commercial and/or proprietary information.
79:19-22	Discussion of proposed transaction.	Confidential	Confidential commercial and/or proprietary information.

88:15-89:8	Discussion of dividends.	Confidential	Confidential commercial and/or proprietary information.
92:13-96:11, 96:16-102:1, 103:12-104:4, 106:15-111:3	Discussion of reimbursement rates at hospitals and COVID response by PMH.	Confidential	Confidential commercial and/or proprietary information.
113:5 - 120:3; 122:16-122:23; 123:7-125:19; and 126:8-129:9	Discussion of PCC Board of Directors and PMH finances.	Confidential	Confidential commercial and/or proprietary information.