



STATE OF RHODE ISLAND  
OFFICE OF THE ATTORNEY GENERAL

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*Peter F. Neronha*  
*Attorney General*

April 6, 2021

***Via Electronic Mail Only***

Patricia Rocha, Esq.  
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One Citizens Plaza – 8<sup>th</sup> Floor  
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Email: [procha@apslaw.com](mailto:procha@apslaw.com)

***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 Lynn Leahey at her Statement Under Oath on October 26, 2020 in the above-referenced matter. The Attorney General has determined that the testimony identified in the enclosed Exhibit A 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,

***Maria R. Lenz***

Maria R. Lenz  
Assistant Attorney General  
[marialenz@riag.ri.gov](mailto:marialenz@riag.ri.gov)

MRL/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  
Jessica Rider, Health Care Advocate, Special Assistant Attorney General

**Exhibit A**  
**Prospect/Chamber Inc. & Ivy Holdings, Inc.**  
**Office of the Attorney General**  
**Confidential Determinations for Transcript of**  
**Statement Under Oath of Lynn Leahey, RN on**  
**October 26, 2020**

<b>Transcript Cites</b>	<b>Description</b>	<b>Determination</b>	<b>Basis of Designation</b>
18:8-21:11	Discussion of Fatima's internal quality policies.	Confidential	Confidential commercial and/or proprietary information.
21:15-47:11	Discussion of internal quality policies and related data and benchmarks; incidents and review process; Ms. Leahey's role in Prospect's corporate structure.	Confidential	Confidential commercial and/or proprietary information.
49:25-59:4	Further discussion of Nurse Leahy's management role, including resolution of grievances and union relations. Discussion of safety protocols.	Confidential	Confidential commercial and/or proprietary information.

61:15-72:9	Discussion of COVID-19 incidents and impact.	Confidential	Confidential commercial and/or proprietary information.
73:16-74:3	Discussion of lawsuit.	Confidential	Confidential commercial and/or proprietary information.
77:19-79:23	Discussion of hospital hierarchy and management positions.	Confidential	Confidential commercial and/or proprietary information.
81:16-82:12	Explanation of electronic continuity of care forms.	Confidential	Confidential commercial and/or proprietary information.
82:14	Ms. Leahey's salary.	Confidential	Confidential commercial, financial, and/or proprietary information. Personal identifiable information, disclosure of which would constitute a clearly unwarranted invasion of privacy.

88:9-93:18	Discussion of supplies. Discussion of relationship with corporate.	Confidential	Confidential commercial and/or proprietary information.
94:8-95:18	Discussion of employee-employer relations and benefit packages.	Confidential	Confidential commercial and/or proprietary information.
95:23-96:20	Discussion of employee retention.	Confidential	Confidential commercial and/or proprietary information.
97:24-98:23	Discussion of employee titles.	Confidential	Confidential commercial and/or proprietary information.
99:24-115:24	Discussion about capital improvements; Fatima's financial condition; general quality metrics; executive visits to hospitals; and relationship with other CNOs.	Confidential	Confidential commercial and/or proprietary information.

120:2-124:7	Discussion of ProPublica article and service lines.	Confidential	Confidential commercial and/or proprietary information.
124:19 - 137:21, 139:4-142:10	Discussion of surveys, quality standards, and ProPublica article.	Confidential	Confidential commercial and/or proprietary information.
143:17-159:25	Discussion of COVID-19.	Confidential	Confidential commercial and/or proprietary information.
162:19-163:4	Discussion of COVID-19 supplies.	Confidential	Confidential commercial and/or proprietary information.