



STATE OF RHODE ISLAND
OFFICE OF THE ATTORNEY GENERAL

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Peter F. Neronha
Attorney General

April 7, 2021

Via Electronic Mail Only

Patricia Rocha, Esq.
Adler Pollock & Sheehan P.C.
One Citizens Plaza – 8th Floor
Providence, RI 02903
Email: 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 Edwin Santos at his Statement Under Oath on November 4, 2020 in the above-referenced matter. The Attorney General has determined that the testimony identified in the enclosed Revised Exhibit A will be deemed confidential at this time for the reasons stated therein. The Exhibit A enclosed with our letter dated April 6, 2021 contained a clerical error on page 2.

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

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

Revised Exhibit A
Prospect/Chamber Inc. & Ivy Holdings, Inc.
Office of the Attorney General
Confidential Determinations for Transcript of
Statement Under Oath of Edwin J. Santos on
November 4, 2020

Transcript Cites	Description	Determination	Basis of Designation
26:23-28:3	Mr. Santos's compensation.	Confidential	Confidential financial, and/or proprietary information. Personal identifiable information disclosure of which would constitute an unwarranted invasion of privacy.
45:5-46:19	Why the CharterCARE board partnered with Prospect in 2014.	Confidential	Confidential commercial information.
56:20 - 84:15, 85:11-97:5	Review of Mr. Santo's Conflict of Interest Form. Discussion about Board, Board member relations, and board oversight of budgets and quality of care.	Confidential	Confidential commercial and/or proprietary information.
99:3-104:3	Discussion about mock survey.	Confidential	Confidential commercial and/or proprietary information.

110:3 -113:3	Discussion of ProPublica article and confidential business information, status, and strategy.	Confidential	Confidential commercial and/or proprietary information.
115:3-117:3	Discussions about board processes.	Confidential	Confidential commercial and/or proprietary information.
127:19-132:4	Discussion of hospital finances.	Confidential	Confidential commercial, financial, and/or proprietary information.
132:9-150:8	Discussion of Nix hospital system, certain financials and acquisitions, and Board response to COVID-19.	Confidential	Confidential commercial, financial, and/or proprietary information.
150:12-157:23	Discussion of conflict of interest status.	Confidential	Confidential commercial, financial, and/or proprietary information.
161:6-175:6	Discussion of Mr. Santos' Board role as chairman and knowledge of Prospect CharterCARE's operating documents; board and hospital functions in general.	Confidential	Confidential commercial and/or proprietary information.

175:18-190:14	Discussion of maintenance projects, hospital finances, reimbursement rates, removal of Category A members, and pending CEC/HCA applications.	Confidential	Confidential commercial, financial, and/or proprietary information.
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