



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 Mark Johnson at his Statement Under Oath on February 11, 2021 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 Mark Johnson**  
**on March 1, 2021**

<b>Transcript Cites</b>	<b>Description</b>	<b>Determination</b>	<b>Basis of Designation</b>
9:1-4	Confidential health information	Confidential	Confidential medical information. Personal identifiable information, disclosure of which would constitute a clearly unwarranted invasion of privacy.
23:21-24:5, 24:23-25:16	Discussion of job duties.	Confidential	Confidential commercial and/or proprietary information.
25:19-26:19	Discussion of Mr. Johnson's salary, benefits, and bonus.	Confidential	Confidential commercial, financial, and/or proprietary information. Personal identifiable information, disclosure of which would constitute a clearly unwarranted invasion of privacy.
26:13-29:10	Discussion of PMH salary and bonus structure.	Confidential	Confidential commercial, financial, and/or proprietary information.
31:11-38:11	Discussion of Mr. Johnson's job duties and Prospect's operation and budget processes.	Confidential	Confidential commercial, financial, and/or proprietary information.

39:2-89:13	Discussion of role in 2014 conversion and Prospect's financial performances.	Confidential	Confidential commercial, financial, and/or proprietary information.
90:22-102:22	Discussion of Prospect's charity care obligations, financial support of RI hospitals and internal cash flow. Discussion about PCC's capital spending.	Confidential	Confidential commercial, financial, and/or proprietary information.
103:23-136:21	Discussion of PCC financials	Confidential	Confidential commercial information.
137:22-165:8	Discussion of Leonard Green, employee interactions, and financials.	Confidential	Confidential commercial, financial, and/or proprietary information.
165:21-184:10	Discussion of vendor policies, dividends, and PACE financings, and general financials.	Confidential	Confidential commercial, financial, and/or proprietary information.