



STATE OF RHODE ISLAND
OFFICE OF THE ATTORNEY GENERAL

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Peter F. Neronha
Attorney General

September 25, 2026

VIA EMAIL

Leslie Parker
Adler Pollock & Sheehan P.C.
100 Westminster St, 16th FL
Providence, RI 02903
lparker@apslaw.com

Re: Centurion-CharterCARE HCA Decision – Strategic Plan and Governance Review

Dear Ms. Parker,

I write regarding the Transacting Parties' compliance with the Attorney General's Decision in the Hospital Conversion Act Application of Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., Prospect CharterCARE, LLC, Prospect CharterCARE RWMC, LLC, Prospect CharterCARE SJHSRI, LLC, The Centurion Foundation, Inc., CharterCARE Health of Rhode Island, Inc., CharterCARE Roger Williams Medical Center, Inc., and CharterCARE Our Lady of Fatima Hospital, Inc., as amended on November 14, 2024 and July 31, 2025 and as modified by waivers dated September 26, 2025 and February 26, 2026 ("Decision").

Condition 17 of the Decision requires the New CharterCARE System to engage a Turnaround Consultant to "evaluate the financial condition, strategic planning, governance materials and current operations of the New CharterCARE System and subsequently develop and implement a strategy to improve operations, stem operational losses, ensure appropriate investment in capital needs, and improve access to safe, high-quality care." Condition 17(c) of the Decision requires that "[t]he Strategic Plan and Governance Review shall be submitted to the Attorney General for review and approval prior to its implementation, which review and approval shall not take more than thirty (30) days."

Counsel for the New CharterCARE System submitted a draft "5 Year Strategic Plan" to this Office on September 15, 2026, subject to Board approval. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]. The "5 Year Strategic Plan" submitted to this Office on September 15, 2026, in our view, relies on unrealistic and unsupported assumptions regarding the successful implementation of initiatives, such as

[REDACTED]

For these reasons, and because Management's Strategic Plan does not address or incorporate the Turnaround Consultant's evaluation and recommendations to safeguard the near-term financial viability of the CharterCARE hospitals, it is not and will not be approved by this Office. Please re-submit a Strategic Plan by no later than **Friday, October 2, 2026**, that addresses, incorporates, and carries out the Turnaround Consultant's evaluation and recommendations, including a short-term plan to immediately stem losses and ensure continuity of operations over the next three, six and twelve months.

Sincerely,



Peter F. Neronha
Attorney General