

**From:** [DelGallo, Daniel J](#)  
**To:** [Seeley, Shawn](#)  
**Cc:** [Klukan, Brett](#)  
**Subject:** [External\_Sender] RE: Change of Control Letter dated 10/3/19  
**Date:** Wednesday, November 27, 2019 9:53:18 AM

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Hi Shawn, it was party an oversight and party confusion of the request at the time. While those partnerships occurred prior, they did not result in a name change of those entities nor did it require new Operating Agreements for NRRON because the owners of NRRON remained the same (JMH and HH remained owners, and still do, of NRRON) . The Prospect Medical Holdings acquisition was significantly different in that it required name changes of Manchester Memorial and Rockville General Hospitals, a change from non-profit to for-profit, and new Operating Agreements and reforming of NRRON. That is why even my predecessors of NRRON didn't do change of control either.

After speaking to your team during the survey recently, they stated that change of control goes beyond the core owners of the joint venture. I apologize I didn't recognize that at the time.

It is very confusing and I can explain probably better on the phone if you want to have a call. I would be happy to do that if needed. Our center is a rare Joint venture in that it is owned by 4 hospital systems.

Dan

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**From:** Seeley, Shawn [mailto:Shawn.Seeley@nrc.gov]  
**Sent:** Wednesday, November 27, 2019 9:41 AM  
**To:** DelGallo, Daniel J  
**Cc:** Klukan, Brett  
**Subject:** Change of Control Letter dated 10/3/19

Mr. DelGallo,

I am reviewing your change of control notification dated October 3, 2019. It appears most of the information had been submitted in March 2018. However, it appears as though the relationships with Trinity Health of New England and Hartford Healthcare were omitted from the 2018 request. Was this an oversight or did this transfer occur after the one with Prospect Medical Holdings.

We will have to follow the same process as we did for the 2018 submission. Please let me know if you have any further questions.

Shawn

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