

NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

November 7, 2019

Francisco T. Morales  
101 Stratford Road, Suite 210  
Winston-Salem, NC 271004

**No Review**

**Record #:** See Attachment A  
**Facility Name:** See Attachment A  
**FID #:** See Attachment A  
**Business Name:** See Attachment A  
**Business #:** See Attachment A  
**Project Description:** Change in Holding Company Name  
**County:** See Attachment A

Dear Mr. Morales:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the above referenced proposal. Based on the CON law **in effect on the date of this response to your request**, the proposal described in that correspondence is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

You may need to contact the Agency's Adult Care Licensure Section to determine if they have any requirements for development of the proposed project.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office.

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Tanya M. Saporito  
Project Analyst

Martha J. Frisone  
Chief

cc: Adult Care Licensure Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION  
HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603  
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704  
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

**ATTACHMENT A**  
**FRANCISCO T. MORALES**  
**NOVEMBER 7, 2019**

<b>NO REVIEW ID #</b>	<b>FACILITY</b>	<b>FID NUMBER</b>	<b>COUNTY</b>	<b>OLD HOLDING Co.</b>	<b>NEW HOLDING Co.</b>	<b>BUSINESS ID</b>
3112	Currituck House	080097	Currituck	WT AL Holdings, LLC	Currituck Holdco, LLC	3126
3113	Mitchell House	080504	Mitchell	WT AL Holdings, LLC	Mitchell Holdco, LLC	3129
3114	Haywood House	080178	Haywood	WT AL Holdings, LLC	Haywood Holdco, LLC	3130
3115	The Stratford	960565	Orange	WT AL Holdings, LLC	Chapel Hill Holdco, LLC	3132
3116	Guilford House	100777	Guilford	WT AL Holdings, LLC	Guilford Holdco, LLC	3128
3118	Alamance House	100775	Alamance	WT AL Holdings, LLC	Burlington Holdco, LLC	3135
3117	New Hanover House	051355	New Hanover	WT AL Holdings, LLC	Wilmington Holdco, LLC	3137
3119	The Gardens of Pamlico	970010	Pamlico	HOB I, LLC (Lessor)	Grantsboro Holdco, LLC	3138
3120	The Gardens of Pamlico	970010	Pamlico	Grantsboro AL Holdings, LLC (Lessee)	Grantsboro Holdco, LLC	3138
3121	Rose Glen Manor	060853	Wilkes	HOB I, LLC	Rose Glen Holdco, LLC	3139
3122	East Towne	920341	Mecklenburg	Charlotte AL Holdings, LLC	East Towne Holdco, LLC	3140
3123	Four Oaks Senior Living	921218	Johnston	Four Oaks AL Holdings, LLC	Four Oaks Holdco, LLC	3141

The below clients of my Firm are in the process of refinancing the adult care homes listed below. As part of the refinance process, the lender has required the clients to establish new holding companies that are the sole members of the respective Lessors and Lessees. The attached notice letters are to request non-withdrawal of the Certificates of Need (CONs) associated with these communities given the change in corporate structure. As discussed in the letters, no transfer of the CONs is contemplated by this refinancing transaction. Hard copies of the letters are being overnighted to your office.

	Facility Name	Facility Address:	County	Licensed Beds (including SCU)	License No.
1	Currituck House	141 Moyock Landing Drive Moyock, NC 27958	Currituck	90 (48 SCU)	HAL-027-003
2	Mitchell House	13681 Hwy 226 South Spruce Pine, NC 28777	Mitchell	80 (48 SCU)	HAL-061-011
3	Haywood House	27 North Main Street Canton, NC 28716	Haywood	60 (60 SCU)	HAL-044-042
4	Stratford, The	405 Smith Level Road Chapel Hill, NC 27516-9108	Orange	77 (33 SCU)	HAL-068-025
5	Guilford House	5918 Netfield Road Greensboro, NC 27455	Guilford	60 (32 SCU)	HAL-041-077
6	Alamance House	2766 Grand Oaks Boulevard Burlington, NC 27215	Alamance	94 (48 SCU)	HAL-001-148
7	New Hanover House	3915 Stedwick Court Wilmington, NC 28412	New Hanover	61 (32 SCU)	HAL-065-036
8	Gardens of Pamlico, The	22 Magnolia Way Grantsboro, NC 28529	Pamlico	70 (12 SCU)	HAL-069-002
9	Rose Glen Manor	240 Independence Avenue North Wilkesboro, NC 28659	Wilkes	60 (16 SCU)	HAL-097-015
10	East Towne	4815 North Sharon Amity Road Charlotte, NC 28205	Mecklenburg	120 (0 SCU)	HAL-060-159
11	Four Oaks Senior Living	565 Boyette Road Four Oaks, NC 27524	Johnston	96 (40 SCU)	HAL-051-060

Please let me know if you have any comments, questions, or concerns about these matters.

Thank you,

Francisco

<image002.png>

**Francisco T. Morales**

Partner

P: 336.717.1289

E: [fmorales@waldrepllp.com](mailto:fmorales@waldrepllp.com)

A: 101 S. Stratford Rd., Ste. 210, Winston-Salem, NC 27104

Web: [Visit our new website!](#)

**Waller, Martha K**



**From:** Frisone, Martha  
**Sent:** Friday, October 25, 2019 10:00 PM  
**To:** Waller, Martha K  
**Subject:** Fwd: [External] Requests for Non-Withdrawal of Certificates of Need  
**Attachments:** Letters.zip.zip\_renamed

Not sure if Lisa forwarded this to you already.

Get [Outlook for iOS](#)

**From:** Morales, Francisco <fmorales@waldrepllp.com>  
**Sent:** Friday, October 25, 2019 5:25:06 PM  
**To:** Frisone, Martha <martha.frisone@dhhs.nc.gov>  
**Cc:** Pittman, Lisa <lisa.pittman@dhhs.nc.gov>; McNames, John <jmcnames@waldrepllp.com>  
**Subject:** [External] Requests for Non-Withdrawal of Certificates of Need

**CAUTION:** External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [report.spam@nc.gov](mailto:report.spam@nc.gov)

Martha:

I hope this email finds you well.

The below clients of my Firm are in the process of refinancing the adult care homes listed below. As part of the refinance process, the lender has required the clients to establish new holding companies that are the sole members of the respective Lessors and Lessees. The attached notice letters are to request non-withdrawal of the Certificates of Need (CONs) associated with these communities given the change in corporate structure. As discussed in the letters, no transfer of the CONs is contemplated by this refinancing transaction. Hard copies of the letters are being overnighted to your office.

	Facility Name	Facility Address:
1	3112 Currituck House	141 Moyock Landing Drive Moyock, NC 27958
2	3113 Mitchell House	13681 Hwy 226 South Spruce Pine, NC 28777
3	Haywood House	27 North Main Street Canton, NC 28716
4	Stratford, The	405 Smith Level Road Chapel Hill, NC 27516-9108
5	Guilford House	5918 Netfield Road Greensboro, NC 27455
6	Alamance House	2766 Grand Oaks Boulevard Burlington, NC 27215

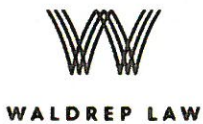
SEE ATTACHED

7	New Hanover House	3915 Stedwick Court Wilmington, NC 28412
8	Gardens of Pamlico, The	22 Magnolia Way Grantsboro, NC 28529
9	Rose Glen Manor	240 Independence Avenue North Wilkesboro, NC 28659
10	East Towne	4815 North Sharon Amity Road Charlotte, NC 28205
11	Four Oaks Senior Living	565 Boyette Road Four Oaks, NC 27524

Please let me know if you have any comments, questions, or concerns about these matters.

Thank you,

Francisco



**Francisco T. Morales**

Partner

P: 336.717.1289

E: [fmorales@waldrepllp.com](mailto:fmorales@waldrepllp.com)

A: 101 S. Stratford Rd., Ste. 210, Winston-Salem, NC 27104

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Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized State official. Unauthorized disclosure of juvenile, health, legally privileged, or otherwise confidential information, including confidential information relating to an ongoing State procurement effort, is prohibited by law. If you have received this email in error, please notify the sender immediately and delete all records of this email.

***Moyock Propco Holdings, LLC &  
CHI Holdings, LLC***

***Post Office Box 2568  
Hickory, North Carolina 28603-2568***

Received by Healthcare  
Planning & CON  
Section  
OCT 28 2019

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Moyock Propco Holdings & CHI Holdings, LLC  
Currituck House (Currituck County) – HAL-027-003– 90 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of CHI Holdings, LLC (“Tenant”) and Moyock Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Currituck House,” located at 141 Moyock Landing Drive, Moyock, North Carolina 27958 (the “Facility”). The Facility has a licensed capacity of 90 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

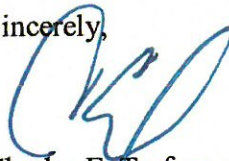
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

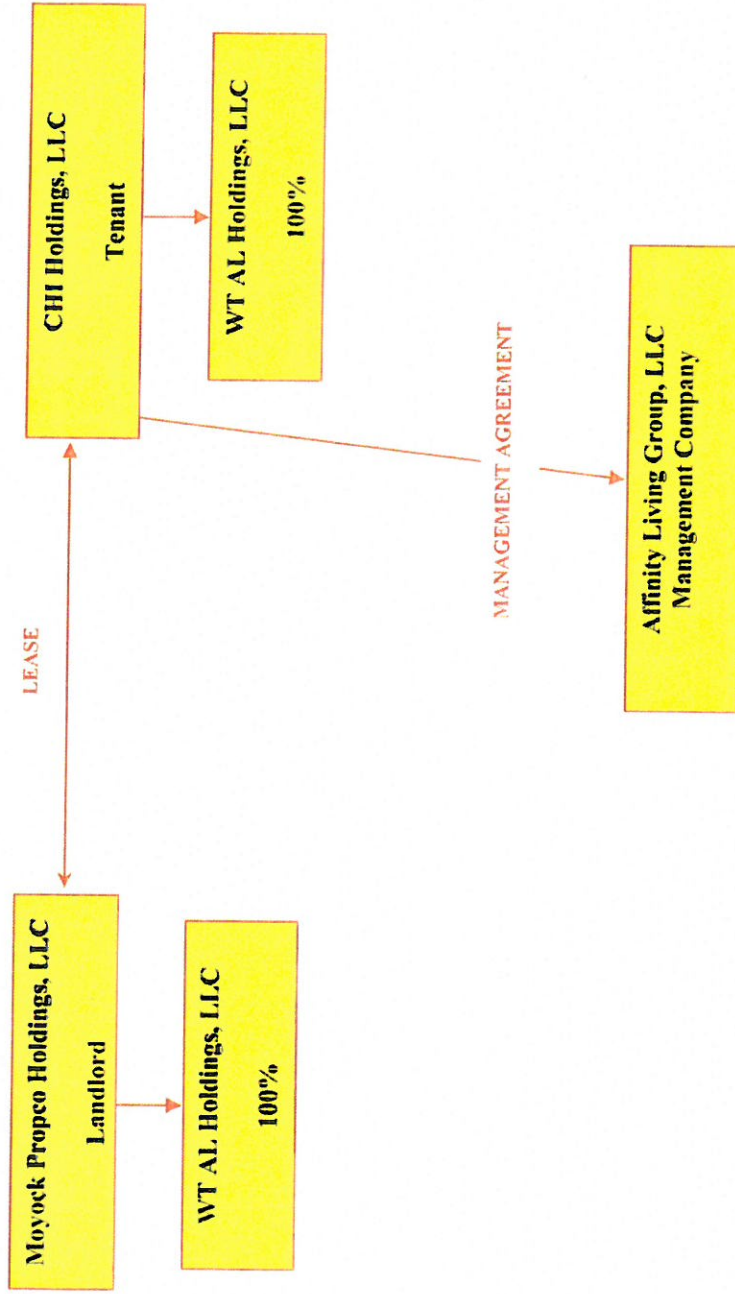
A handwritten signature in blue ink, appearing to read 'CET', written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Moyock Propco Holdings, LLC  
CHI Holdings, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

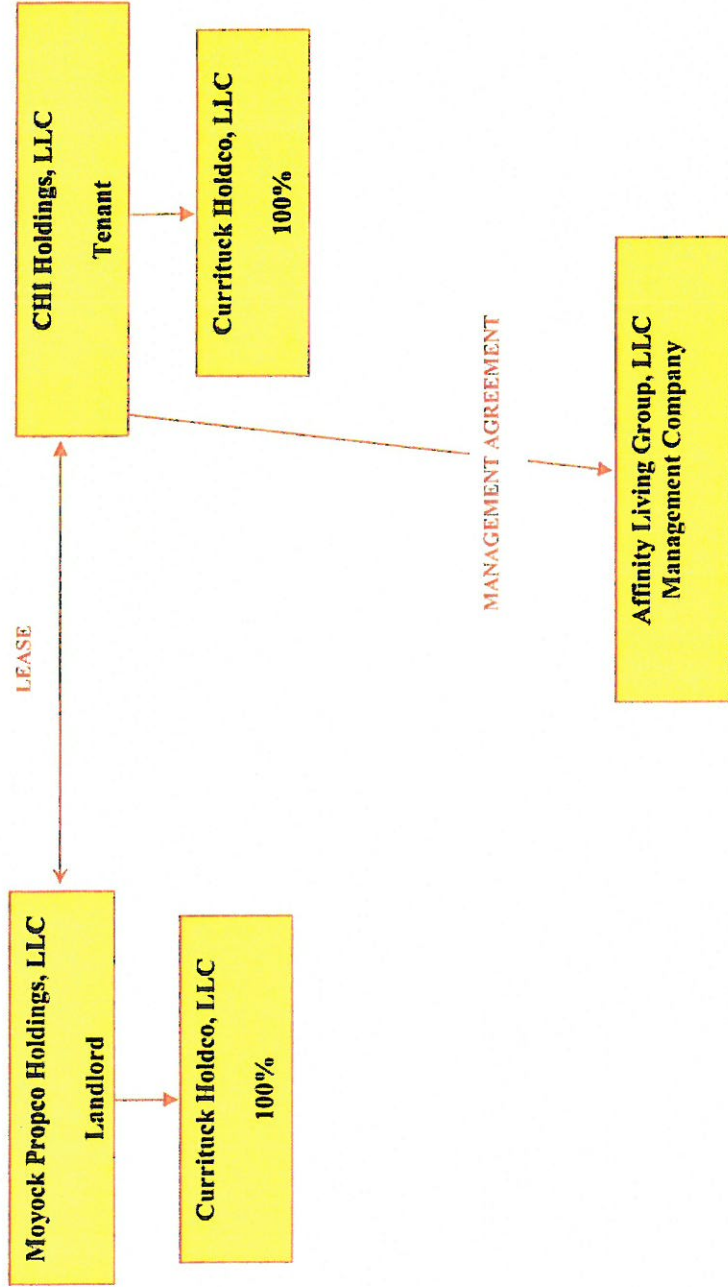
**EXHIBIT A**

**Currituck House  
Current Corporate Structure**





# Currituck House Proposed New Corporate Structure



***Spruce Pine Propco Holdings, LLC &  
Mitchell House One, LLC***

*Post Office Box 2568  
Hickory, North Carolina 28603-2568*

Received by Healthcare  
Planning & CON Section  
OCT 28 2019

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Spruce Pine Propco Holdings & Mitchell House One, LLC  
Mitchell House (Mitchell County) – HAL-061-011– 80 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Mitchell House One, LLC (“Tenant”) and Spruce Pine Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Mitchell House,” located at 13681 Hwy 226 South, Spruce Pine, North Carolina 28777 (the “Facility”). The Facility has a licensed capacity of 80 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

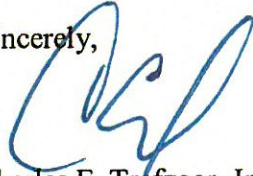
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

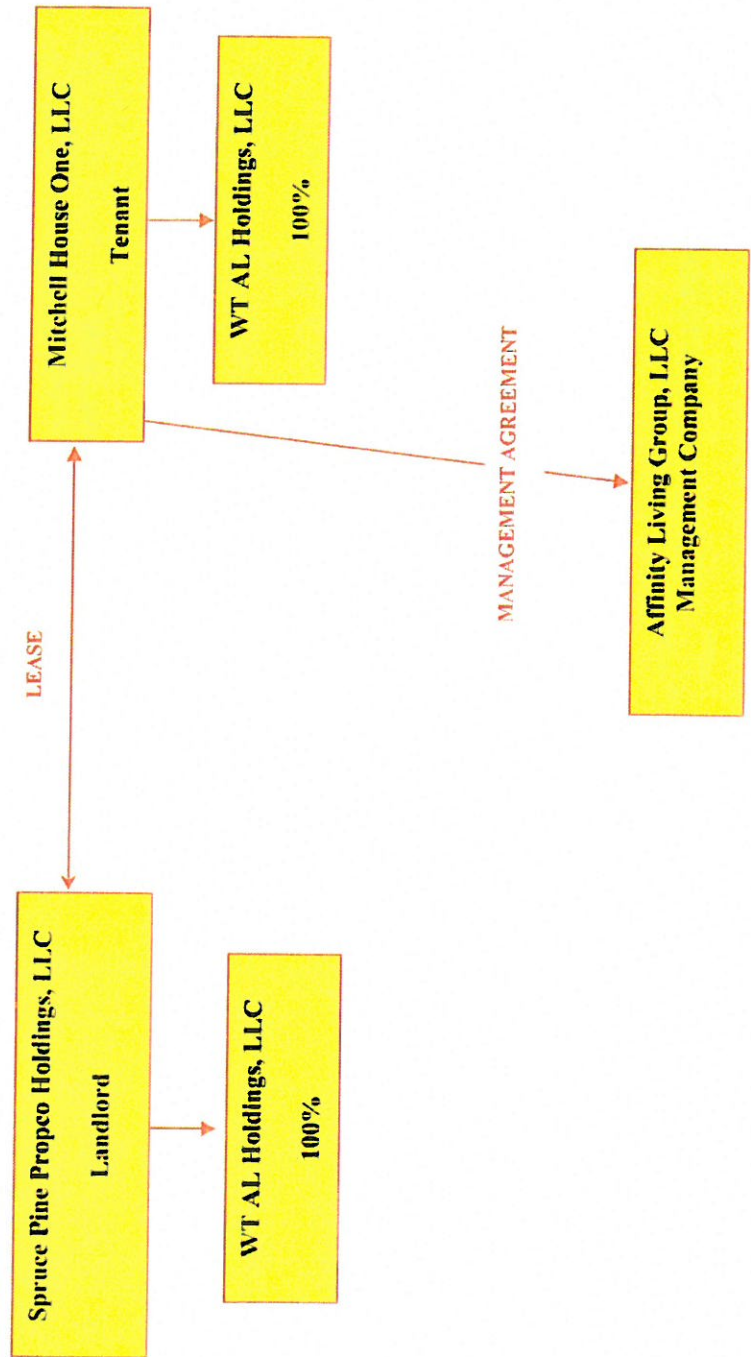
A handwritten signature in blue ink, appearing to read 'C. Trefzger, Jr.', written in a cursive style.

Charles E. Trefzger, Jr.  
Authorized Representative  
Spruce Pine Propco Holdings, LLC  
Mitchell House One, LLC

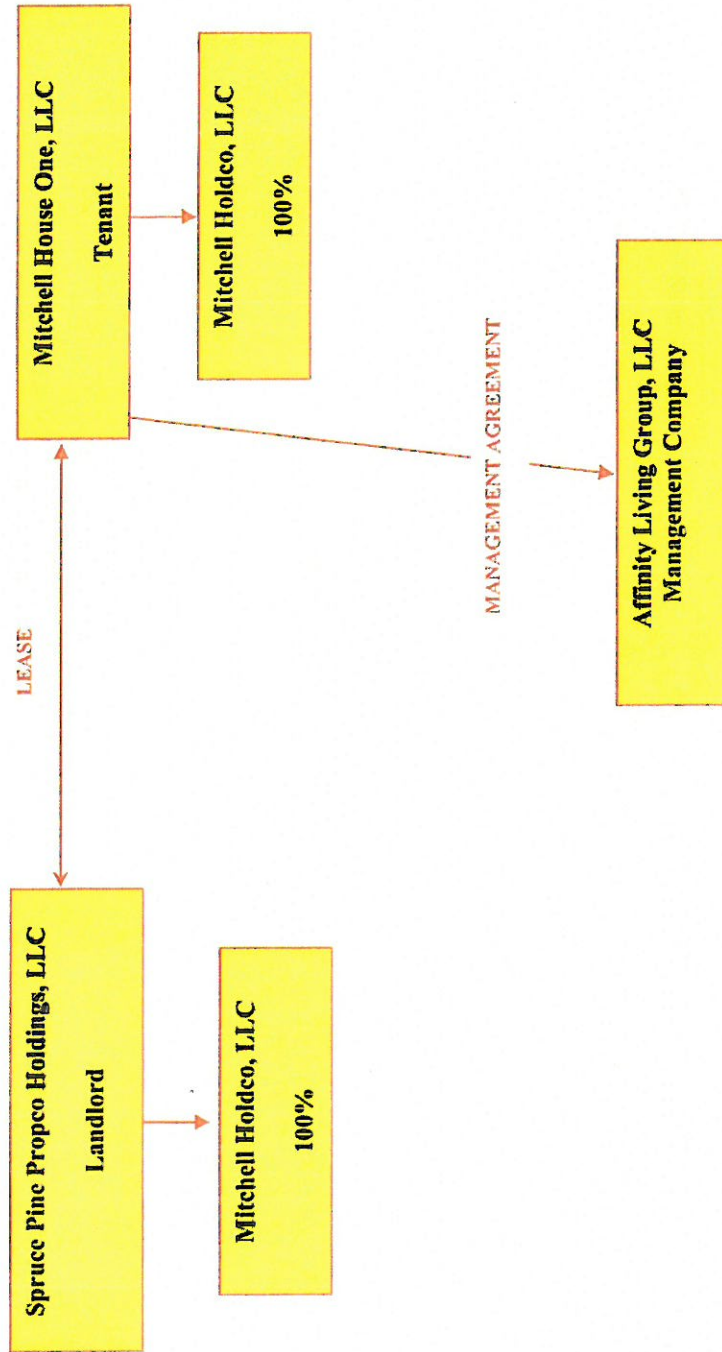
Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**Mitchell House  
Current Corporate Structure**



**Mitchell House  
Proposed New Corporate Structure**



***Canton Propco Holdings, LLC &  
Haywood Health Holdings, LLC***

*Post Office Box 2568  
Hickory, North Carolina 28603-2568*

Received by Healthcare  
Planning & CON Section  
OCT 28 2019

October 25, 2019

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Canton Propco Holdings & Haywood Health Holdings, LLC  
Haywood House (Haywood County) – HAL-044-042– 60 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Haywood Health Holdings, LLC (“Tenant”) and Canton Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Haywood House,” located at 27 North Main Street, Canton, North Carolina 28716 (the “Facility”). The Facility has a licensed capacity of 60 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

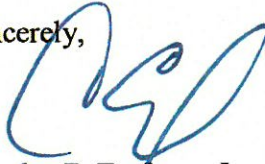
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

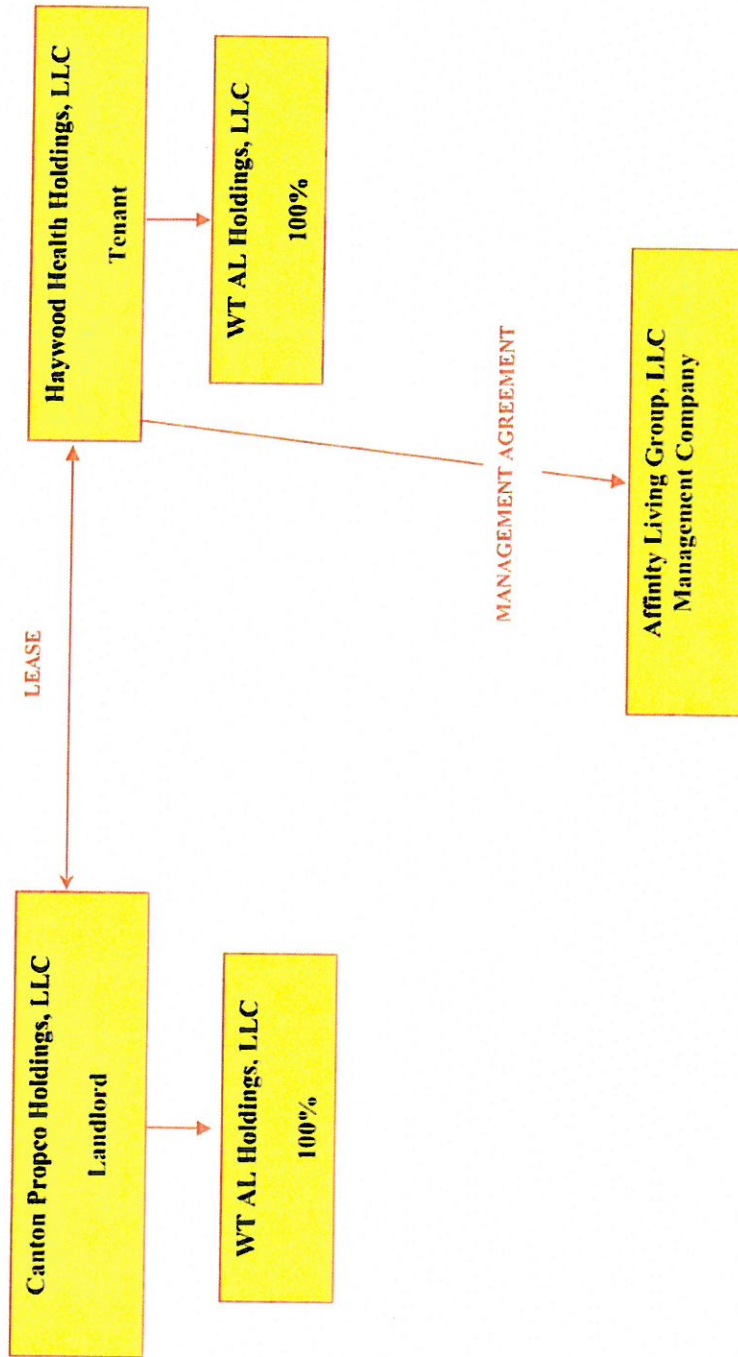
A handwritten signature in blue ink, appearing to read 'CET', is written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Canton Propco Holdings, LLC  
Haywood Health Holdings, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

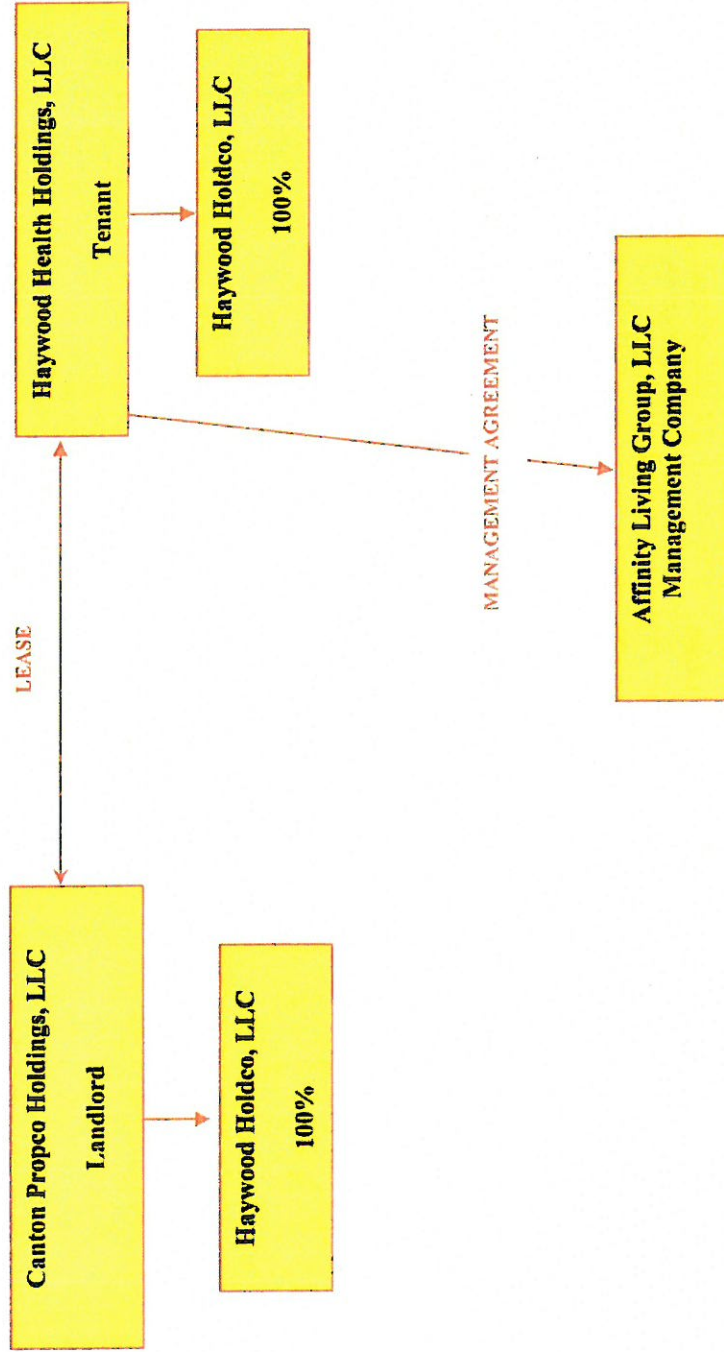
**EXHIBIT A**

**Haywood House  
Current Corporate Structure**





**Haywood House  
Proposed New Corporate Structure**



**Chapel Hill Propco Holdings, LLC &  
SHI-Orange, LLC**

**Post Office Box 2568  
Hickory, North Carolina 28603-2568**

Received by Healthcare  
Planning & Regulation  
OCT 28 2019

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Chapel Hill Propco Holdings & SHI-Orange, LLC  
The Stratford (Orange County) – HAL-068-025– 77 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of SHI-Orange, LLC (“Tenant”) and Chapel Hill Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “The Stratford,” located at 405 Smith Level Road, Chapel Hill, North Carolina 27516 (the “Facility”). The Facility has a licensed capacity of 77 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

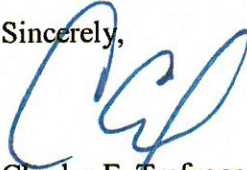
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

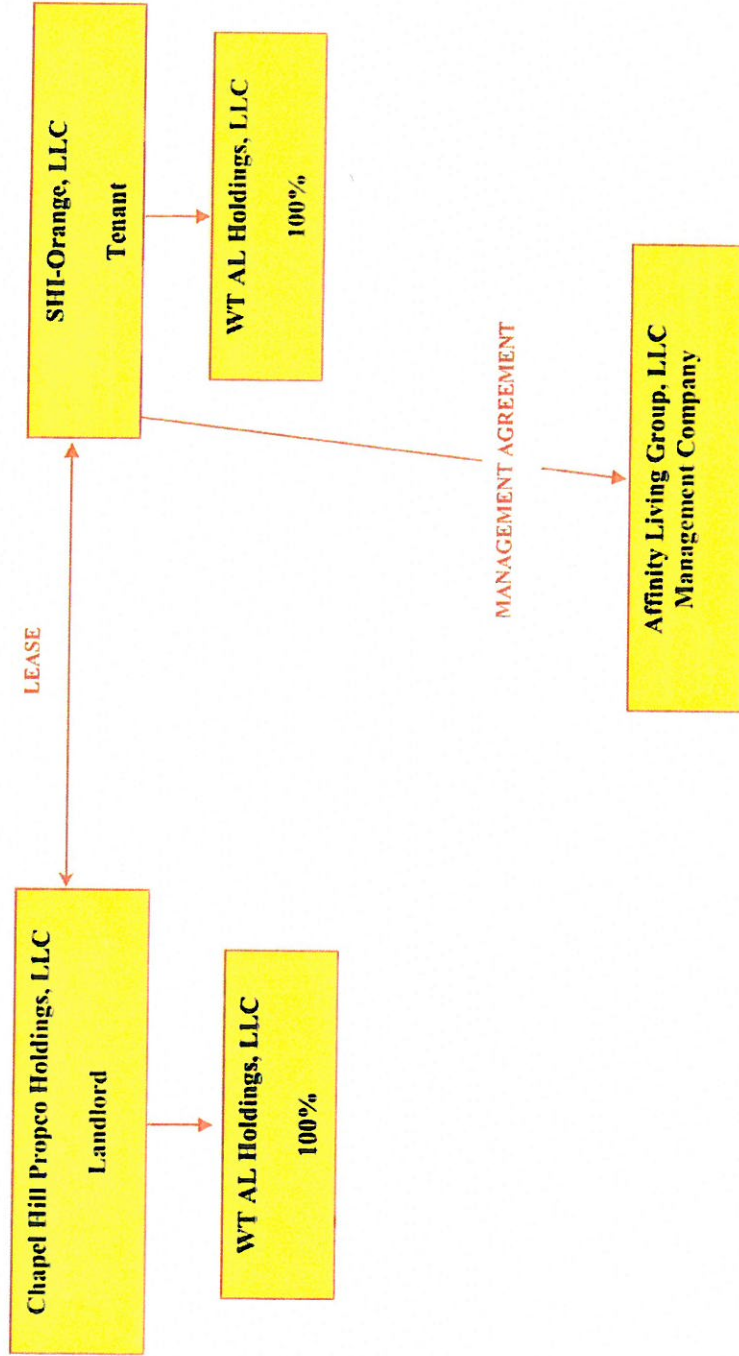
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Charles E. Trefzger, Jr.  
Authorized Representative  
Chapel Hill Propco Holdings, LLC  
SHI-Orange, LLC

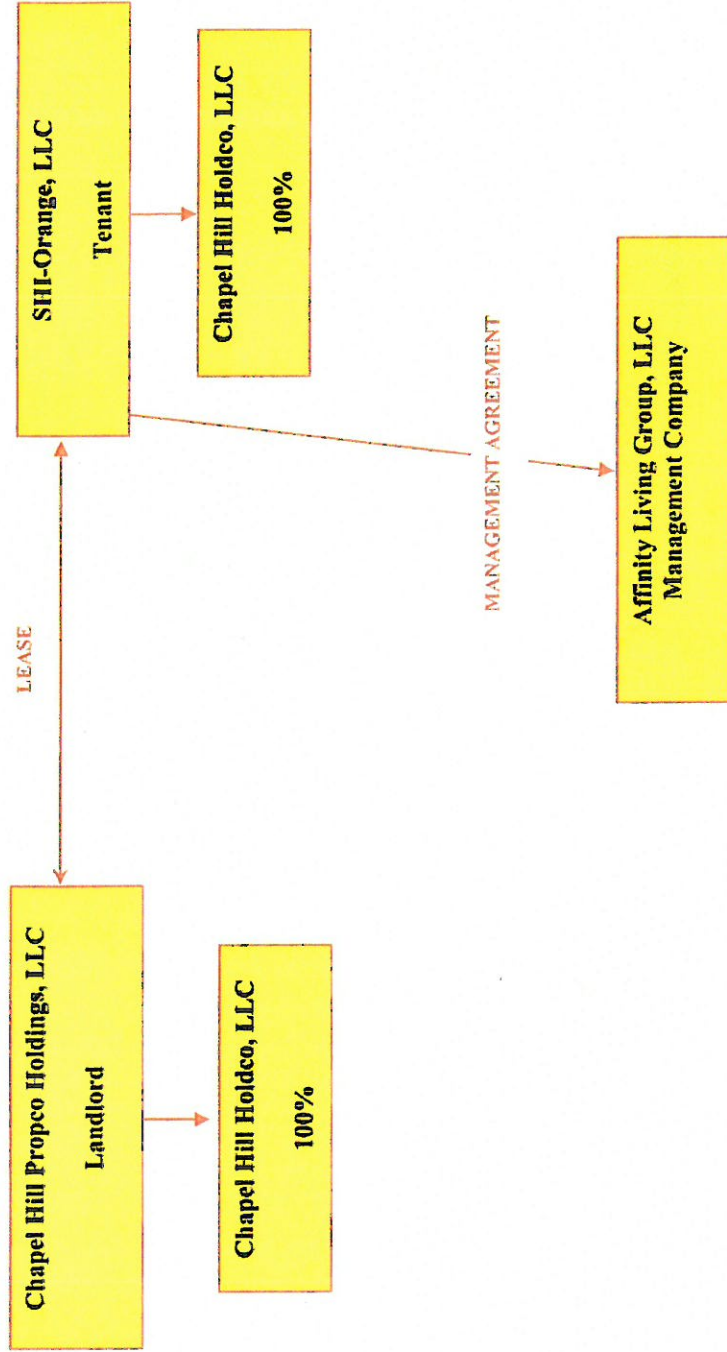
Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**The Stratford  
Current Corporate Structure**



**The Stratford  
Proposed New Corporate Structure**



***Guilford Propco Holdings, LLC &  
Guilford AL Holdings, LLC***

*Post Office Box 2568  
Hickory, North Carolina 28603-2568*

received by Healthcare  
OCT 28 2019  
Planning & CON Section

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Guilford Propco Holdings & Guilford AL Holdings, LLC  
Guilford House (Guilford County) – HAL-041-077– 60 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Guilford AL Holdings, LLC (“Tenant”) and Guilford Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Guilford House,” located at 5918 Netfield Road, Greensboro, North Carolina 27455 (the “Facility”). The Facility has a licensed capacity of 60 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

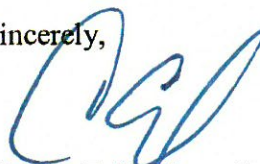
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Sincerely,

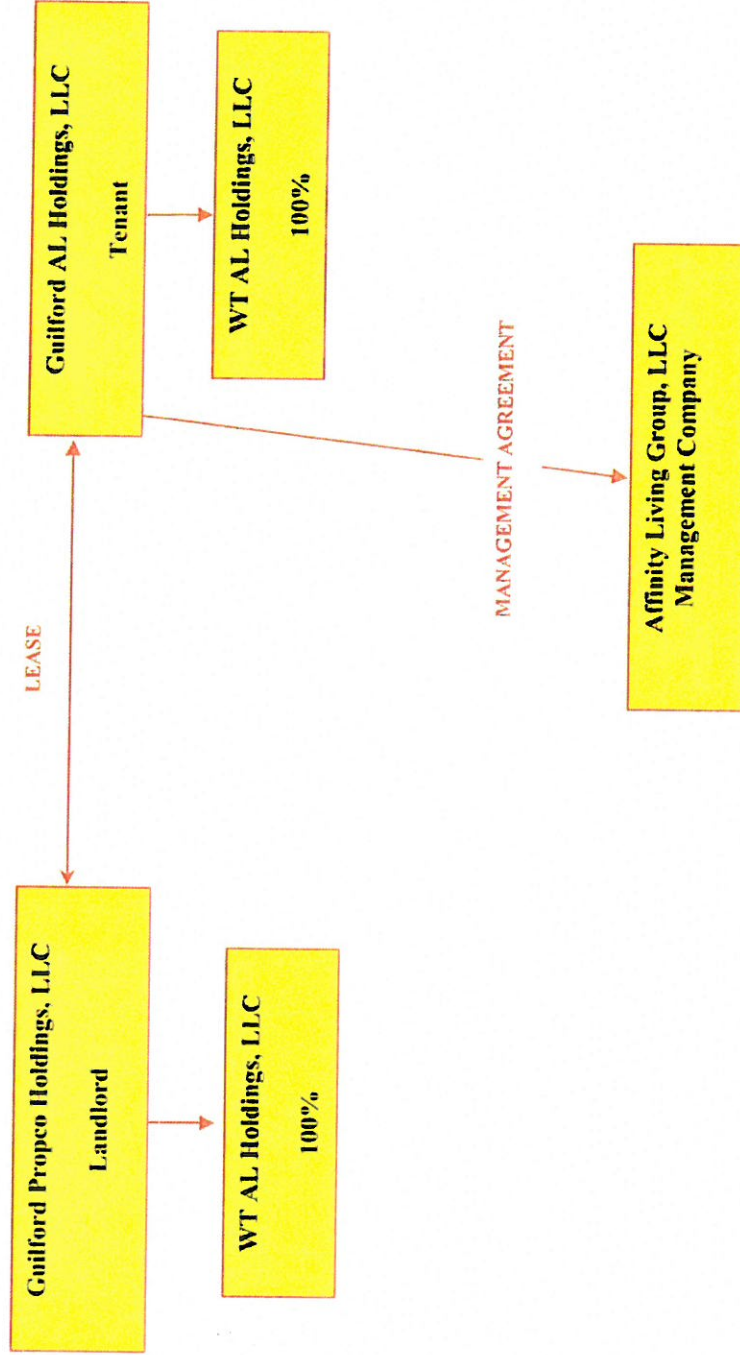
A handwritten signature in blue ink, appearing to read 'C. Trefzger, Jr.', written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Guilford Propco Holdings, LLC  
Guilford AL Holdings, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

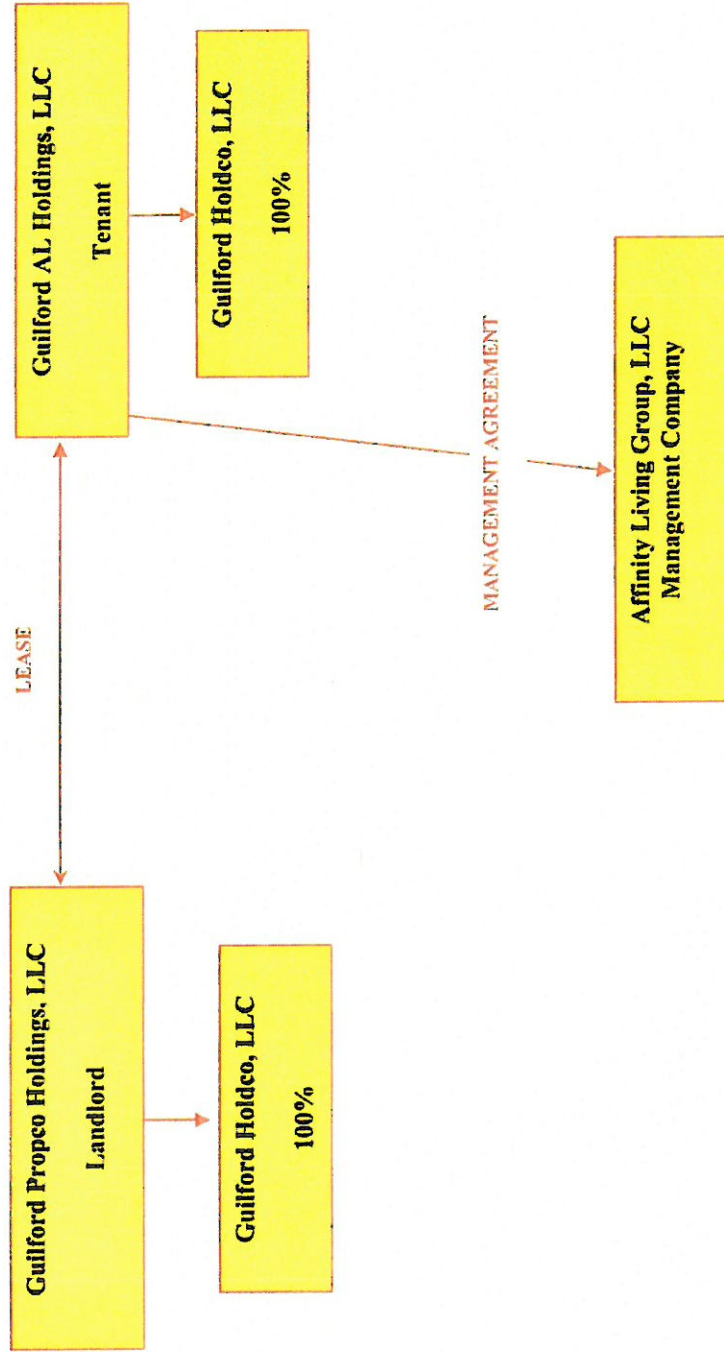
**EXHIBIT A**

**Guilford House  
Current Corporate Structure**





# Guilford House Proposed New Corporate Structure



***Burlington Propco Holdings, LLC &  
Burlington AL Holdings, LLC***

*Post Office Box 2568  
Hickory, North Carolina 28603-2568*

Received by Healthcare  
OCT 28 2019  
Planning & CON Section

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Burlington Propco Holdings & Burlington AL Holdings, LLC  
Alamance House (Alamance County) – HAL-001-160– 94 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Burlington AL Holdings, LLC (“Tenant”) and Burlington Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Alamance House,” located at 2766 Grand Oaks Boulevard, Burlington, North Carolina 27215 (the “Facility”). The Facility has a licensed capacity of 94 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

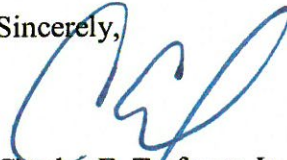
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

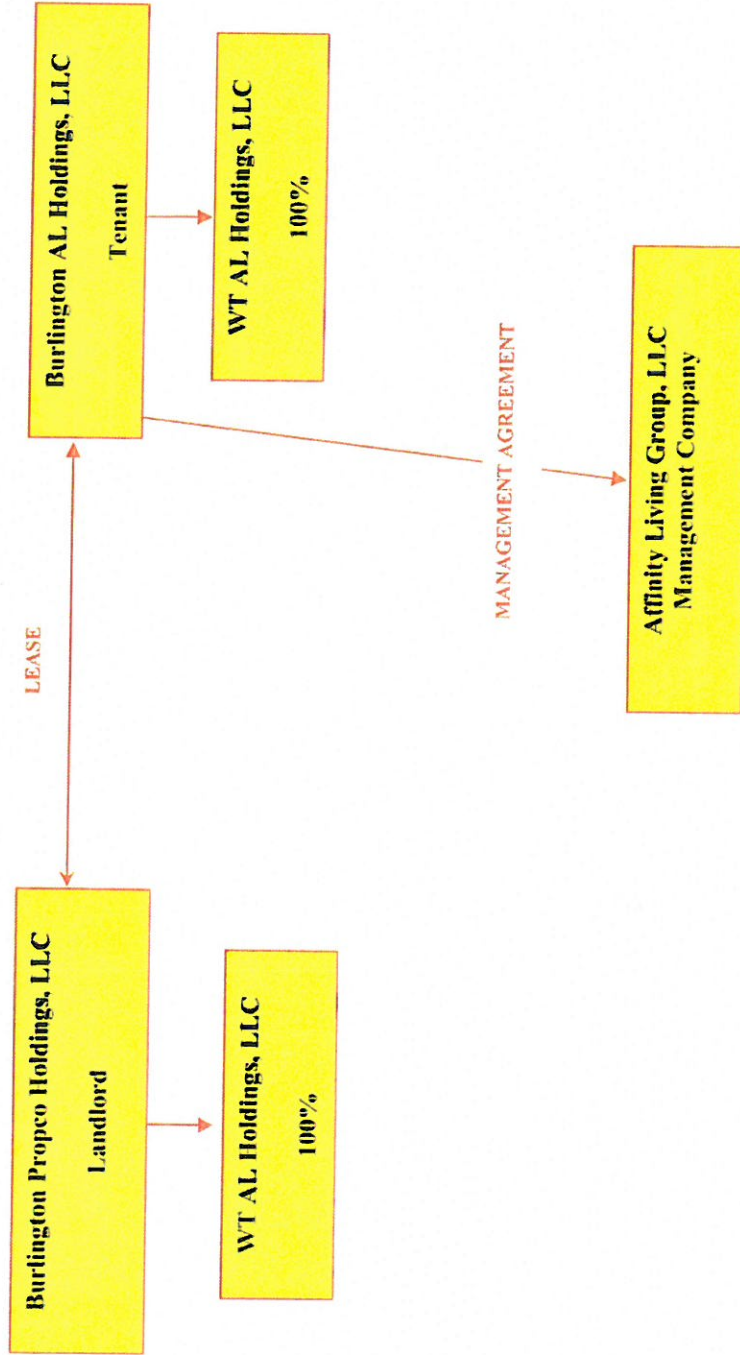
A handwritten signature in blue ink, appearing to read 'CET', written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Burlington Propco Holdings, LLC  
Burlington AL Holdings, LLC

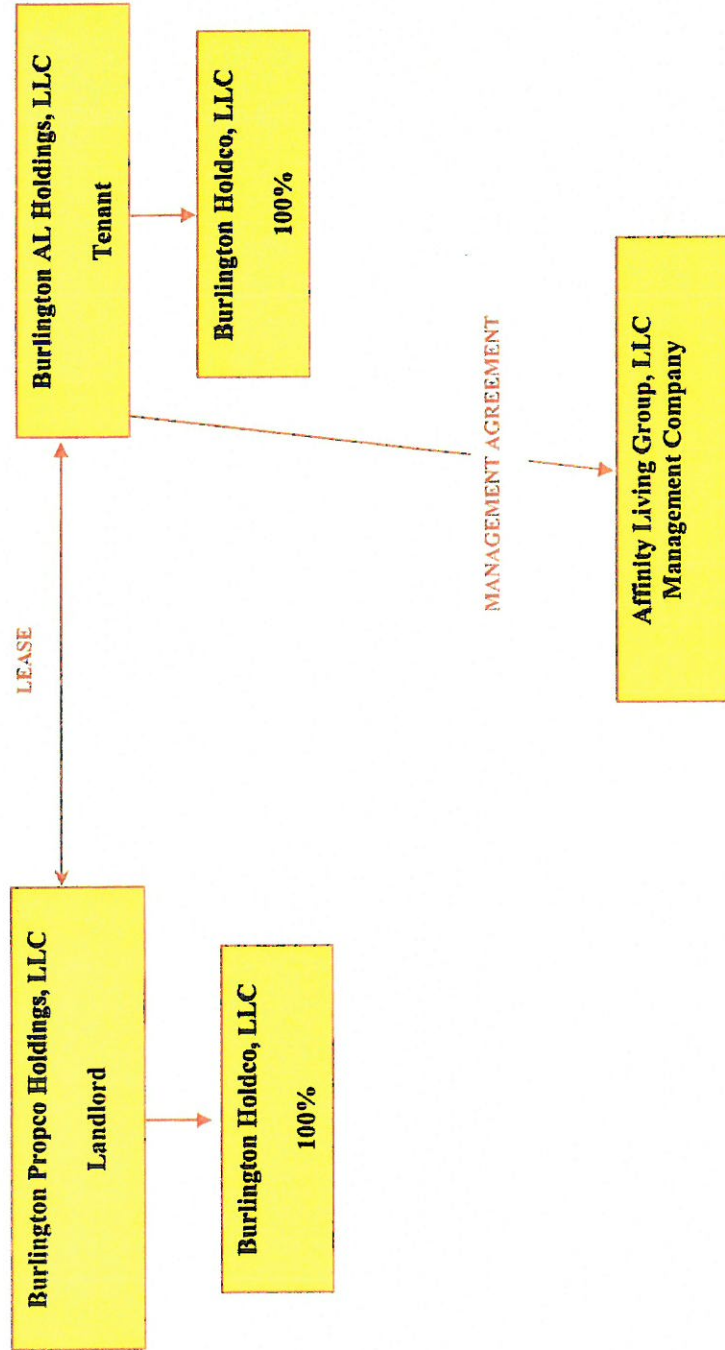
Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**Alamance House  
Current Corporate Structure**



**Alamance House  
Proposed New Corporate Structure**



***Wilmington Propco Holdings, LLC &  
New Hanover House, LLC***

***Post Office Box 2568  
Hickory, North Carolina 28603-2568***

Received by Healthcare  
OCT 28 2019  
Planning & CON Section

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Wilmington Propco Holdings & New Hanover House, LLC  
New Hanover House (New Hanover County) – HAL-065-036– 61 Adult Care  
Home Beds

Dear Ms. Frisone:

I am writing on behalf of New Hanover House, LLC (“Tenant”) and Wilmington Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “New Hanover House,” located at 3915 Stedwick Court, Wilmington, North Carolina 28412 (the “Facility”). The Facility has a licensed capacity of 61 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

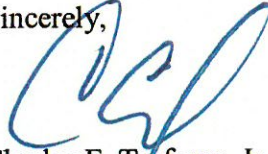
The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F

et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

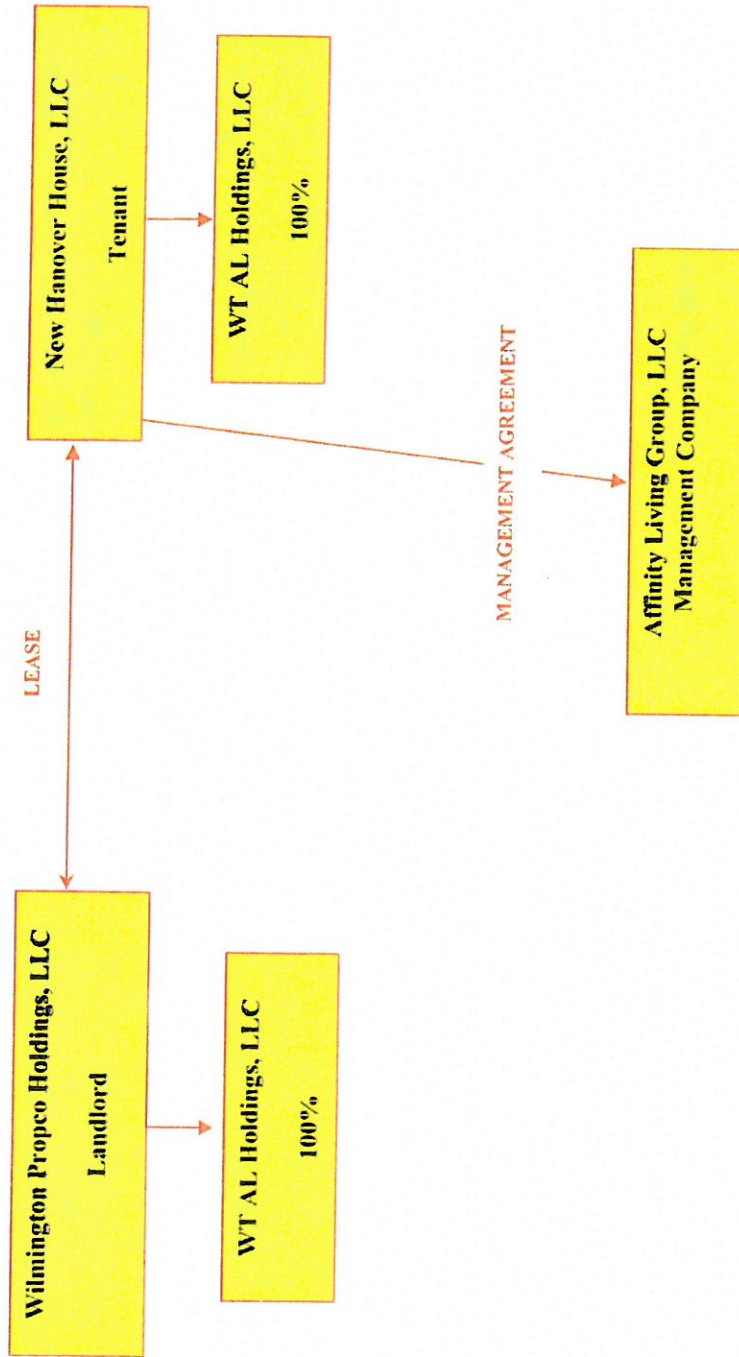
A handwritten signature in blue ink, appearing to read 'CET', is written over the typed name.

Charles E. Trefzger, Jr.  
Authorized Representative  
Wilmington Propco Holdings, LLC  
New Hanover House, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

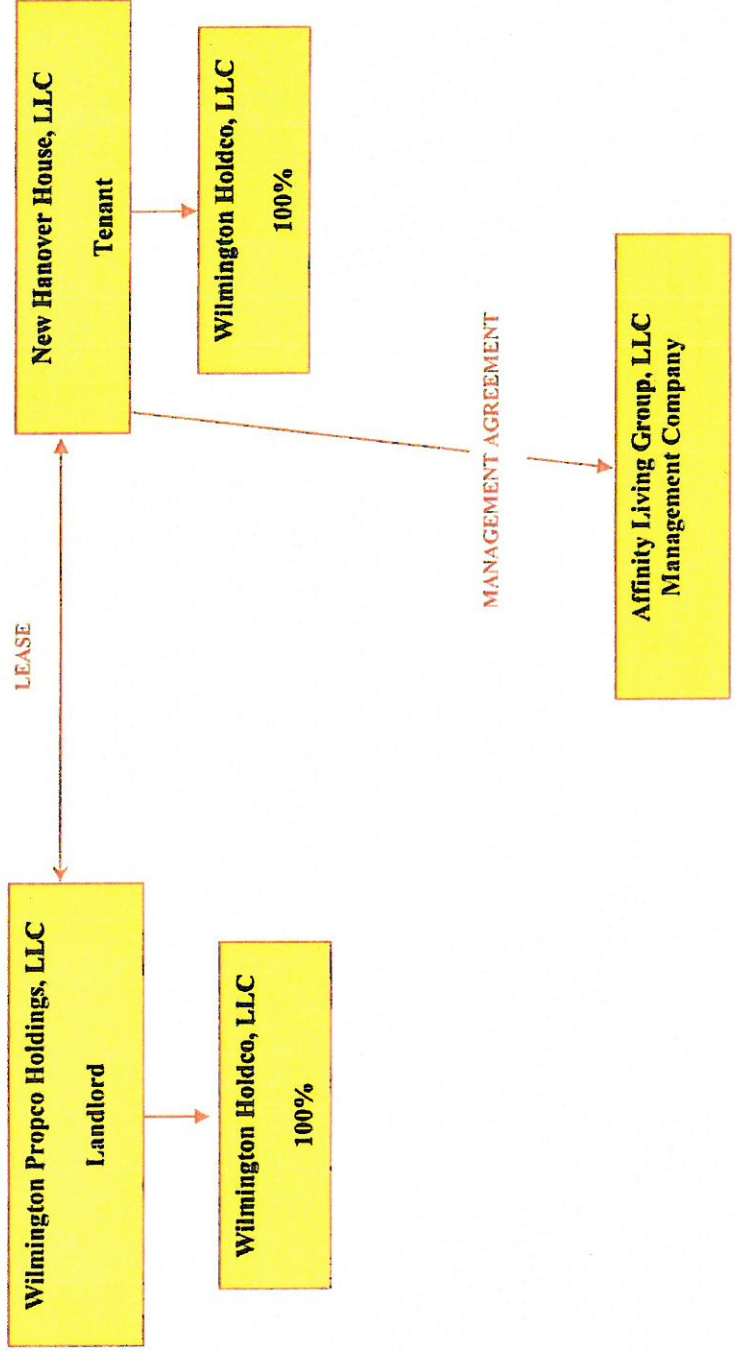
**EXHIBIT A**

**New Hanover House  
Current Corporate Structure**





**New Hanover House  
Proposed New Corporate Structure**



**Grantsboro Propco Holdings, LLC &  
Grantsboro Opco Holdings, LLC**

Post Office Box 2568  
Hickory, North Carolina 28603-2568

Received by Healthcare  
Planning & CON Section  
OCT 28 2019

October 25, 2019

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Grantsboro Propco Holdings & Grantsboro Opco Holdings, LLC  
The Gardens of Pamlico (Pamlico County) – HAL-069-002– 70 Adult Care Home  
Beds

Dear Ms. Frisone:

I am writing on behalf of Grantsboro Opco Holdings, LLC (“Tenant”) and Grantsboro Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “The Gardens of Pamlico,” located at 22 Magnolia Way, Grantsboro, North Carolina 28529 (the “Facility”). The Facility has a licensed capacity of 70 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

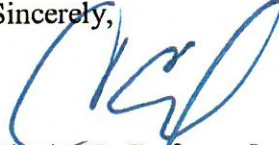
The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F

et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

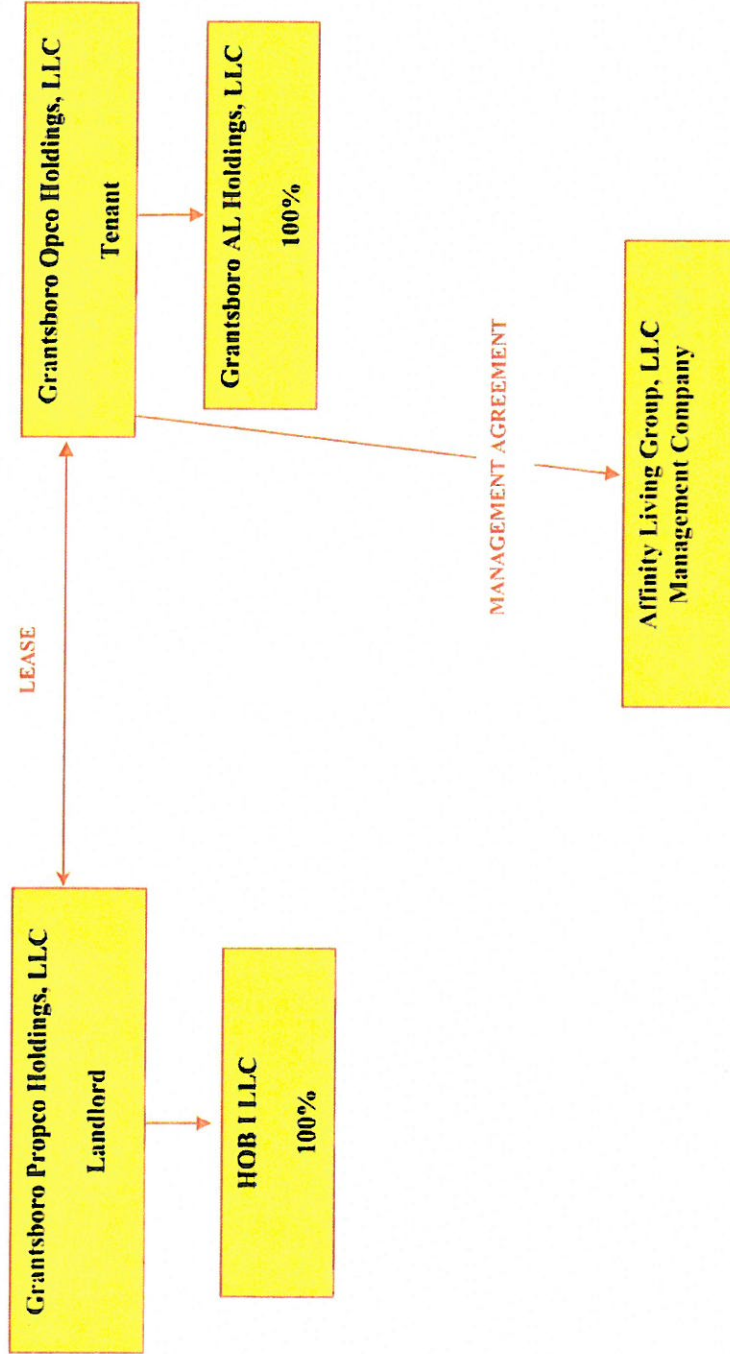
A handwritten signature in blue ink, appearing to read 'CET', is written over the typed name.

Charles E. Trefzger, Jr.  
Authorized Representative  
Grantsboro Propco Holdings, LLC  
Grantsboro Opco Holdings, LLC

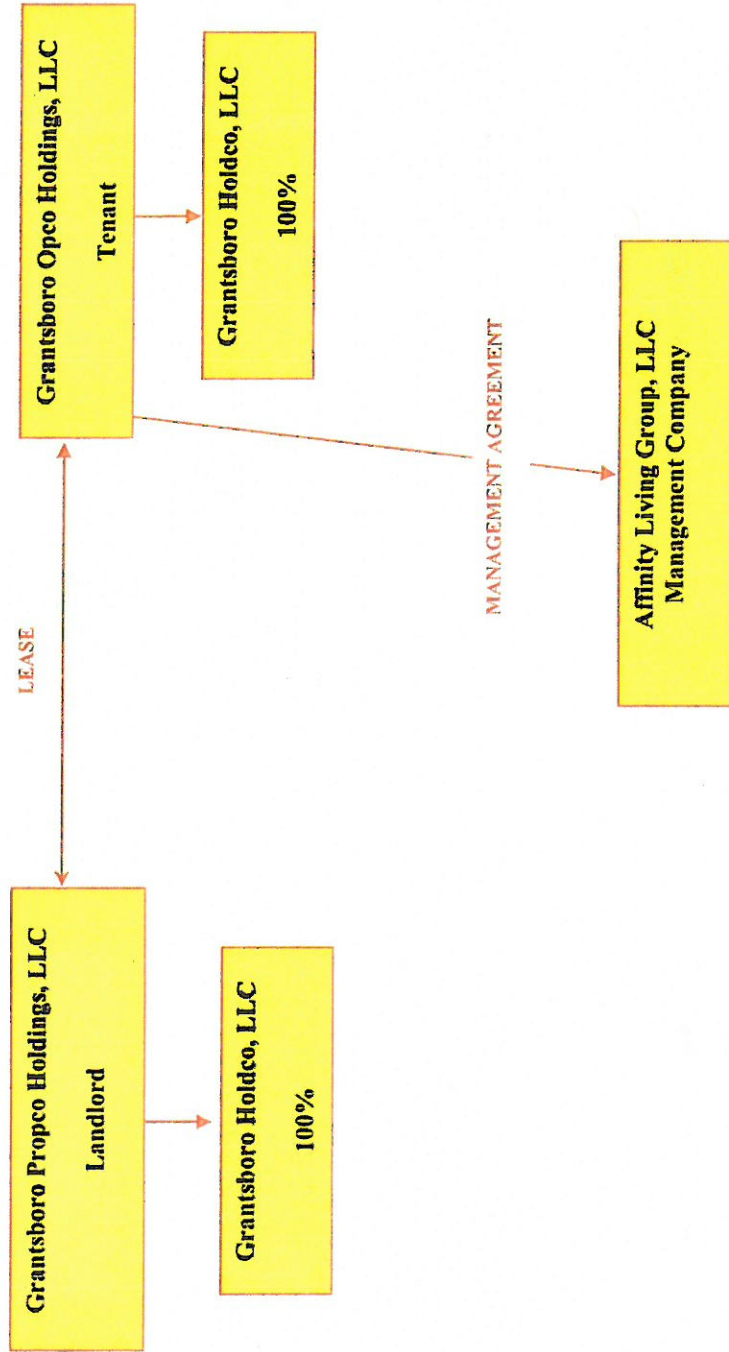
Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**The Gardens of Pamlico  
Current Corporate Structure**



**The Gardens of Pamlico  
Proposed New Corporate Structure**



**Rose Glen Manor Assisted Living, LLC &  
RGM AL Holdings, LLC**

Post Office Box 2568  
Hickory, North Carolina 28603-2568

Received by Healthcare  
Planning & CON Section  
OCT 28 2019

October 25, 2019

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Rose Glen Manor Assisted Living, LLC & RGM AL Holdings, LLC  
Rose Glen Manor (Wilkes County) – HAL-097-015– 60 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of RGM AL Holdings, LLC (“Tenant”) and Rose Glen Manor Assisted Living, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Rose Glen Manor,” located at 240 Independence Avenue, North Wilkesboro, North Carolina 28659 (the “Facility”). The Facility has a licensed capacity of 60 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

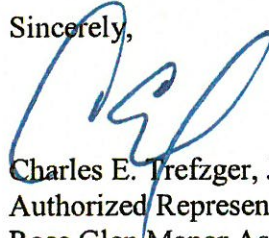
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

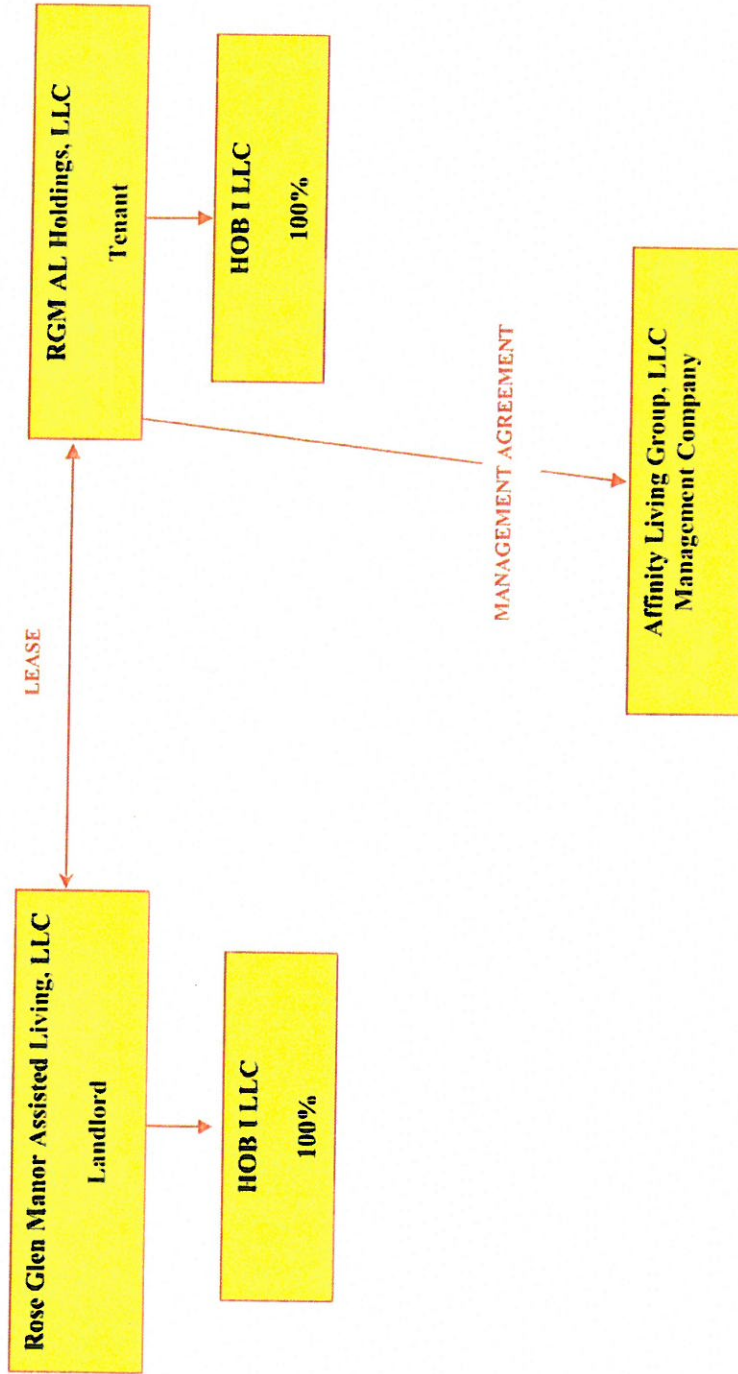
A handwritten signature in blue ink, appearing to read 'C. Trefzger, Jr.', written over the printed name.

Charles E. Trefzger, Jr.  
Authorized Representative  
Rose Glen Manor Assisted Living, LLC  
RGM AL Holdings, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

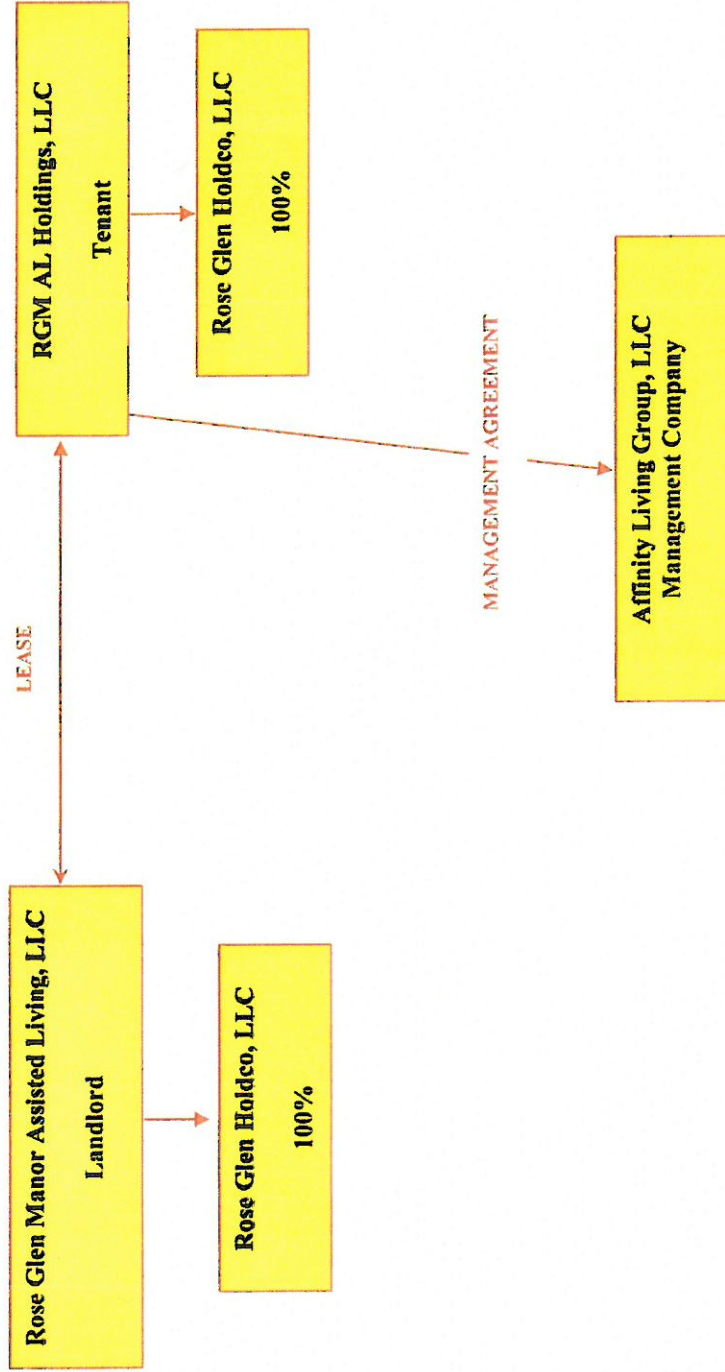
**EXHIBIT A**

**Rose Glen Manor  
Current Corporate Structure**





**Rose Glen Manor  
Proposed New Corporate Structure**



**Charlotte Propco Holdings, LLC &  
Charlotte Opco Holdings, LLC**

Post Office Box 2568  
Hickory, North Carolina 28603-2568



**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Charlotte Propco Holdings & Charlotte Opco Holdings, LLC  
East Towne (Mecklenburg County) – HAL-060-149– 120 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Charlotte Opco Holdings, LLC (“Tenant”) and Charlotte Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “East Towne,” located at 4815 North Sharon Amity Road, Charlotte, North Carolina 28205 (the “Facility”). The Facility has a licensed capacity of 120 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

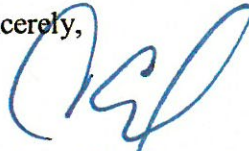
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq.

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

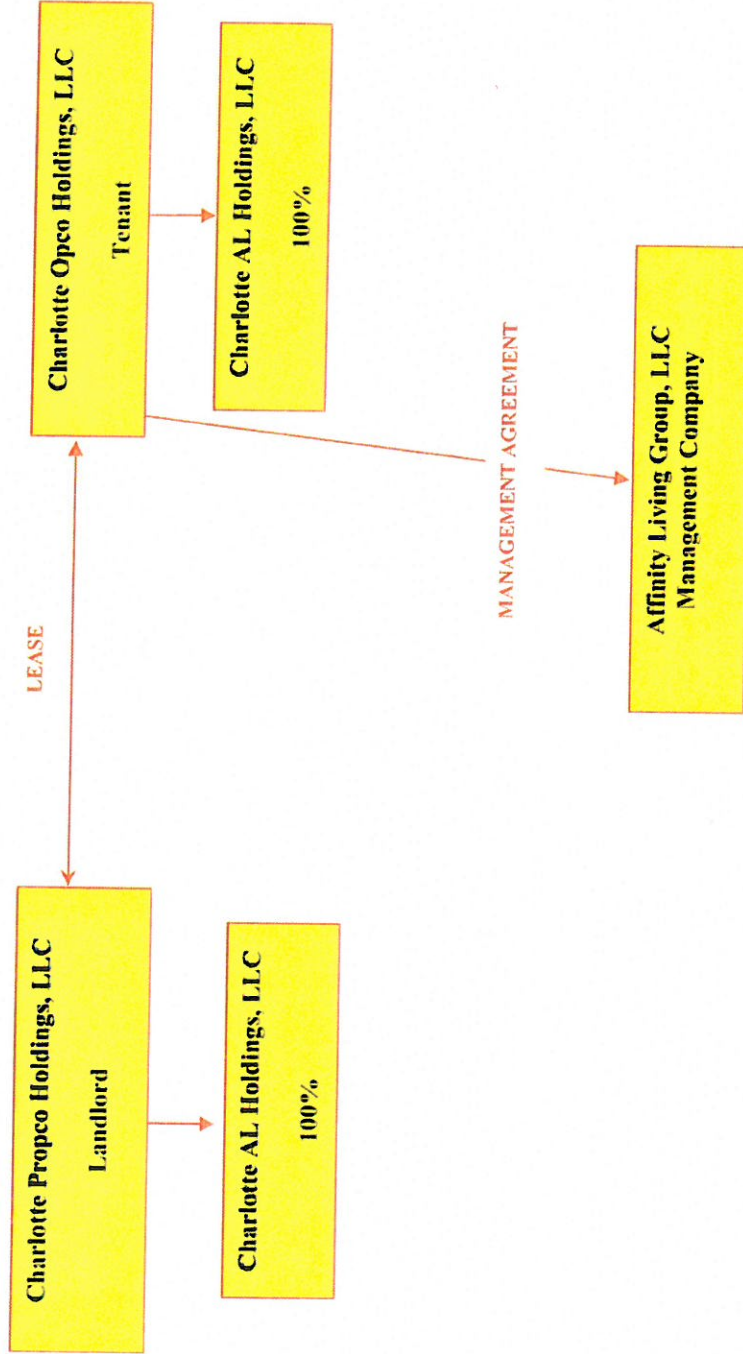
A handwritten signature in blue ink, appearing to read 'CET', is written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Charlotte Propco Holdings, LLC  
Charlotte Opco Holdings, LLC

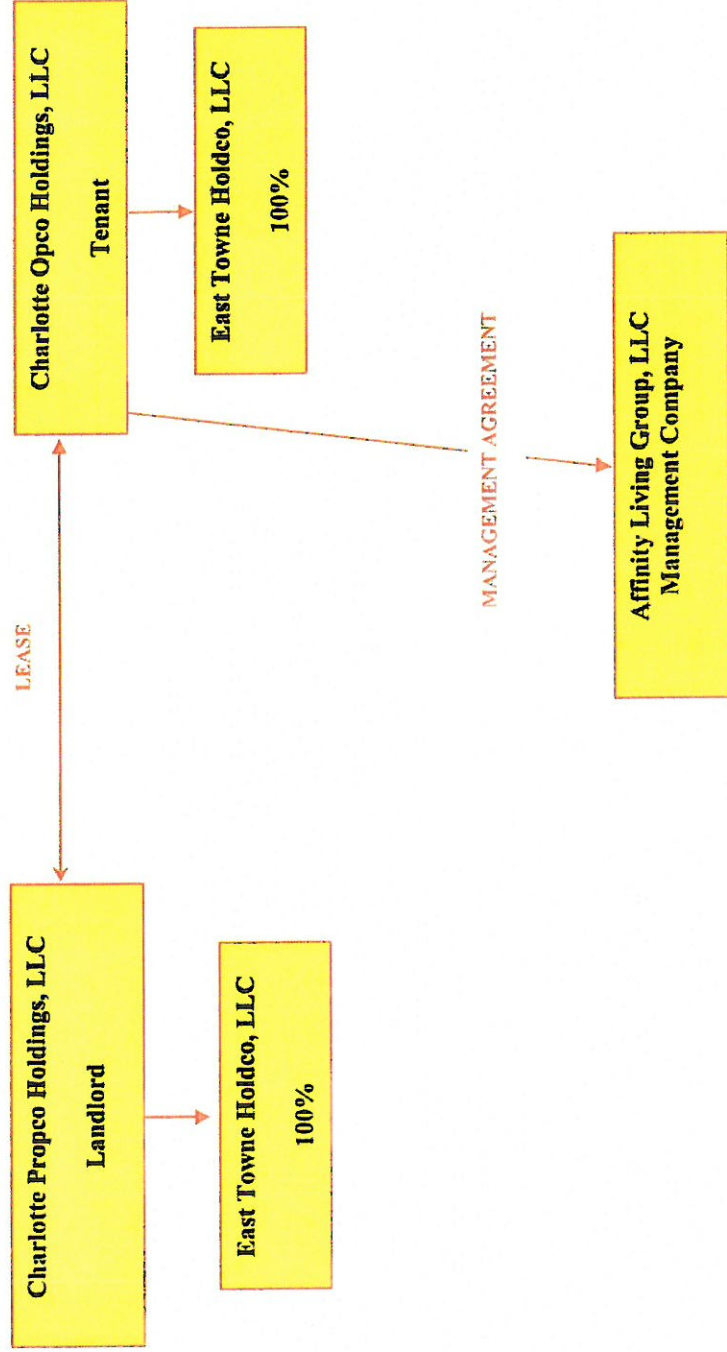
Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**East Towne  
Current Corporate Structure**



**East Towne  
Proposed New Corporate Structure**



***Four Oaks Propco Holdings, LLC &  
Four Oaks Opco Holdings, LLC***

***Post Office Box 2568  
Hickory, North Carolina 28603-2568***

Received by Healthcare  
Planning & CON Section  
OCT 28 2019

**October 25, 2019**

Ms. Martha Frisone, Chief  
Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
North Carolina Department of Health & Human Services  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Re: **Request for Non-Withdrawal of Certificate of Need**  
Four Oaks Propco Holdings & Four Oaks Opco Holdings, LLC, and Four Oaks  
Senior Living (Johnston County) – HAL-051-060 – 96 Adult Care Home Beds

Dear Ms. Frisone:

I am writing on behalf of Four Oaks Opco Holdings, LLC (“Tenant”) and Four Oaks Propco Holdings, LLC (the “Landlord”), North Carolina limited liability companies with their principal place of business located at 400 Second Avenue NW, Hickory, North Carolina 28601-4993. Tenant holds the license to operate the adult care home known as “Four Oaks Senior Living,” located at 565 Boyette Road, Four Oaks, North Carolina 27524 (the “Facility”). The Facility has a licensed capacity of 96 adult care home beds. Landlord owns the real estate and building on which the Facility is located. Landlord leases said premises to Tenant.

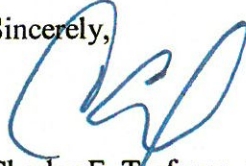
Landlord is refinancing its mortgage debt with a new lender. The new lender is requiring a change in the holding company that is the sole member of Landlord and Tenant. Please refer to the attached Exhibit A that shows the current corporate structure of the Facility, as well as the proposed new corporate structure of the Facility. Other than the changes reflected in Exhibit A, no other changes are contemplated.

The parties believe it is in the best interests of the community for this transaction to take place. Under the proposed new corporate structure, Landlord will continue to own the Facility, and Tenant will continue to operate the facility in accordance with the provisions of N.C. Gen. Stat. § 131D et seq. and 10A NCAC 13F et seq. The proposed change only relates to the entity that holds the ownership interest in Landlord and Tenant. No transfer of the certificate of need is contemplated by this transaction.

In accordance with N.C. Gen. Stat. § 131E-189(c), I intend for this letter to serve as prior written notice to the Agency by which the corporate structure of the Landlord and Tenant is changing. Landlord will continue to own the Facility and Tenant will continue to operate the Facility in accordance with the provisions of

Should you need additional information in order to make a decision on this matter, please do not hesitate to contact me directly.

Sincerely,

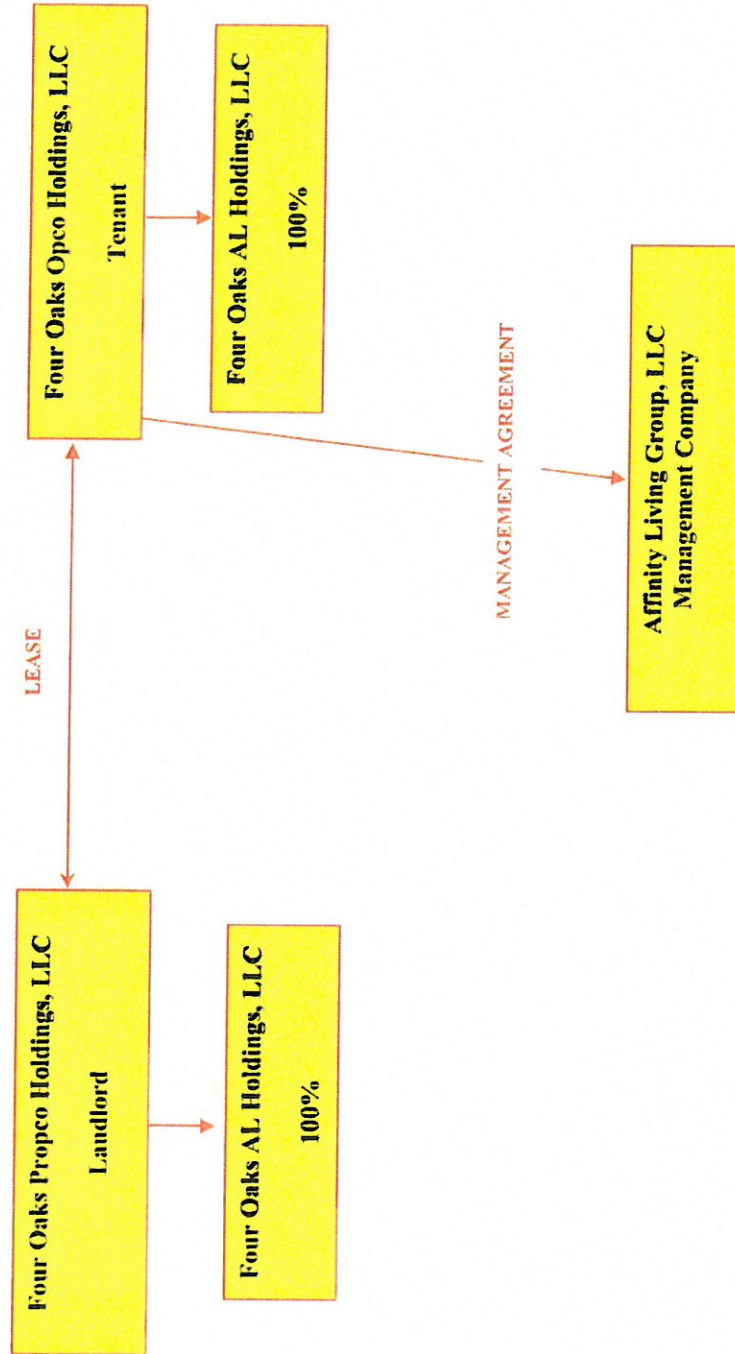
A handwritten signature in blue ink, appearing to read 'CET', is written over the word 'Sincerely,'.

Charles E. Trefzger, Jr.  
Authorized Representative  
Four Oaks Propco Holdings, LLC  
Four Oaks Opco Holdings, LLC

Exhibit A:  
Proposed Changes to Corporate Structure

**EXHIBIT A**

**Four Oaks Senior Living  
Current Corporate Structure**





**Four Oaks Senior Living  
Proposed New Corporate Structure**

