

April 30, 2015

Kenneth Albert, R.N., Esq., Director
Division of Licensing and Regulatory Services
Certificate of Need Unit
Department of Health and Human Services
State House Station #11
41 Anthony Avenue
Augusta, Maine 04333-0011

Mr. Larry Carbonneau, MBA, CPA, CGFM
Senior Healthcare Financial Analyst
Division of Licensing and Regulatory Services
Department of Health and Human Services
State House Station #11
41 Anthony Avenue
Augusta, Maine 04333-0011

Re: Letter of Intent for transfer of certain membership interests of Sentry Commons, LLC and Kittery Commons, LLC (combined Durgin Pines)

Dear Mr. Albert and Mr. Carbonneau,

Pursuant to Sections 71.03(A)(1) and 71.05 of the Department of Licensing and Regulatory Services regulations governing Certificate of Need for Nursing Facility Level of Care Projects and on behalf of our client, Kittery Commons, LLC and Sentry Commons, LLC (combined Durgin Pines), we respectfully submit this letter of intent and request a ruling regarding the applicability of Certificate of Need review.

Sentry Commons, LLC operates an 81-bed nursing facility leased from Kittery Commons, LLC as Durgin Pines and is located in Kittery, Maine. The membership interests of Kittery Commons, LLC and Sentry Commons, LLC are currently owned 50% each by two members, Joseph Hogan and William Gillis. Joseph Hogan intends to purchase the membership interests currently owned by William Gillis, after which Joseph Hogan will own 100% of the membership interests of each entity. The members wish to finalize this transaction as soon as practically possible within regulations.

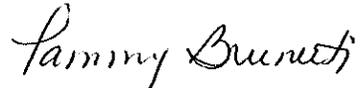
This change in ownership is not anticipated to have any impact on the annual operating costs or planned capital expenditures of the facility and therefore will have no impact on the facility's MaineCare rate or MaineCare neutrality.

With the expectation that you will require a CON review, we would like to request a technical assistance meeting in the near term. We will contact you shortly to schedule a meeting and

look forward to working with you to move expeditiously through the CON process and assure compliance with required regulations.

Please contact me with any questions you may have. I look forward to working with you and your team.

Sincerely,

A handwritten signature in cursive script that reads "Tammy Brunetti".

Tammy Brunetti
Principal | CPA

Cc: Joseph Hogan
William Gillis
Venise Minkowsky