

Daniel J. Lawler
Partner
(312) 214-4861
daniel.lawler@btlaw.com

RECEIVED

OCT 25 2017

October 24, 2017

VIA FEDEX Overnight Delivery

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

Ms. Courtney R. Avery
Administrator
Illinois Health Facilities and
Services Review Board
525 West Jefferson Street, 2nd Floor
Springfield, IL 62761

Ms. Jeannie D. Mitchell
Assistant General Counsel
Illinois Health Facilities and
Services Review Board
69 W. Washington Street, Suite 3501
Chicago, IL 60602

Re: Centegra Health System Project Nos. E-036-17, E-037-07, 17-036, and 17-037

Dear Ms. Avery and Ms. Mitchell:

I am writing in response to the false and irresponsible accusations of Mercy Health in its lawyer's letter to you dated September 15, 2017 asserting that Centegra Hospital – Woodstock improperly discontinued services without Review Board approval and also goading the Review Board to initiate what would constitute a completely frivolous compliance action against Centegra.

Centegra Hospital – Woodstock has not discontinued services without Review Board approval. Centegra has, in full compliance with the Review Board's rules, temporarily suspended designated services at Centegra Hospital – Woodstock, as acknowledged by Review Board Chairlady Olson in her attached letter to Centegra dated August 18, 2017, and further, again in full compliance with the Review Board's rules, Centegra has submitted an exemption application to the Review Board to permanently discontinue the designated services at Centegra Hospital – Woodstock. Mercy Health and its lawyer knew this at the time they made their false accusations.

On behalf of Centegra Health System, I respectfully request that the Review Board and its staff take appropriate action to assure that Centegra's pending applications before the Review Board are not prejudiced by Mercy Health's false accusations, including but not limited to the removal of those letters from the project files.

Very truly yours,

BARNES & THORNBURG LLP



Daniel J. Lawler