

**XAVIER BECERRA**  
*Attorney General*



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**DEPARTMENT OF JUSTICE**

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May 12, 2020

**VIA EMAIL AND US MAIL**

Davis Wright Tremaine LLP  
Hope R. Levy-Biehl  
Suite 2400  
865 South Figueroa Street  
Los Angeles, CA 90017-2566

[HopeLevyBiehl@dwt.com](mailto:HopeLevyBiehl@dwt.com)

RE: Verity Sale of St. Francis Medical Center to Prime Healthcare  
Request for Waiver

Dear Ms. Levy-Biehl:

This office has considered St. Francis Medical Center's and Verity Health System of California, Inc.'s waiver request made on April 18, 2020. After much consideration of the factors set forth under Corporations Code section 5917, as well as the information set forth in your letter, this office denies St. Francis Medical Center's and Verity Health System of California, Inc.'s waiver request. The decisional factors set forth under Corporations Code section 5917 are applicable to the proposed transaction between Prime Healthcare and Verity, including but not limited to, whether the transaction may create a significant effect on the availability or accessibility of health care services to the community served by St. Francis hospital, and thus requires a full review process.

If you have any questions, or comments, please do not hesitate to contact me.

Sincerely,

[original signed]

SCOTT CHAN  
Deputy Attorney General

For XAVIER BECERRA  
Attorney General