



CHCA

CONNECTICUT HEALTH CARE ASSOCIATES

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September 16, 2014

George C. Jepsen
Attorney General
State of Connecticut
55 Elm Street
Hartford, CT 06106

Re: Waterbury Mergers – Certificate of Need Application, OHCA Docket No. 13-31838-CON, AG Docket No. 13-486-01 – The Greater Waterbury Health Systems, Inc./Vanguard Health Systems

Dear Attorney General Jepsen:

As you know, I contacted you in July on behalf of our members regarding the above-referenced mergers/certificate of need applications. Thank you for the responses that I received from your office dated August 4, 2014 and August 25, 2014.

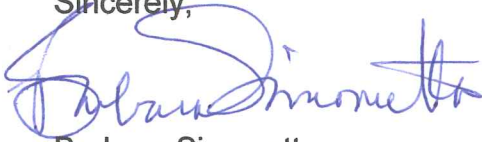
I am writing again today to again inform you that our members continue to be keenly interested in the developments in Waterbury, as well as across the entire state, with Tenet and Yale taking over or merging with existing healthcare providers. We are concerned not only in our capacities as workers in various healthcare facilities, but also as healthcare consumers ourselves.

With regard to the August 4, 2014 letter that you sent to me regarding antitrust concerns, I am very happy to learn that your office is examining the potential competitive implications of the proposed Tenet transactions in Connecticut, as well as the proposed relationship between Tenet and Yale. I am also very happy to learn that you recently signed on as *Amicus Curiae* in the case pending in the United States Court of Appeals for the 9th Circuit, in order to support the Idaho Attorney General's fight to preserve competition and fair-prices for healthcare consumers. Thank you.

With regard to the August 25, 2014 letter sent to me by your colleagues Gary Hawes and Kimberly Martone, our members remain concerned about Tenet's relationship with Vanguard and whether the relationship may run afoul of Connecticut General Statutes §19a-639b and Connecticut Regulation §19a-639b-2 regarding the transferability/assignability of CONs. However, we understand that your office has looked closely at this issue and believes that Vanguard will continue to function as a valid corporate entity, and will not be completely controlled by Tenet. I respectfully request you to continue to review this important issue.

Thank you again Attorney General Jepsen for your work on behalf of Connecticut healthcare consumers and healthcare workers. Although all of the recent Tenet and Yale mergers and takeovers are a bit unsettling, we appreciate that you are looking out for us.

Sincerely,



Barbara Simonetta
President
CHCA, NUHHCE, AFSCME