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March 16, 2023

***SENT VIA CERTIFIED MAIL
AND U.S. MAIL***

Trinity Health Senior Communities
ATTN: Highest Ranking Officer
20555 Victor Parkway
Lavonia, MI 48152

To Whom It May Concern:

I represent St. Joseph County, Indiana, and its department, Portage Manor, in relation to inappropriate, unethical, and illegal actions taken by your employee, Robyn Challinor. I would ask that all future correspondence be directed to my attention.

Robyn Challinor was previously the administrator at Portage Manor and resigned her employment from Portage Manor approximately two years ago. Since that time, Ms. Challinor has continually engaged in inappropriate activity that has caused distress and complications for the management of the facility, the residents of the facility, and St. Joseph County as a whole.

Recently, Ms. Challinor has increased her attacks on Portage Manor by reaching out to state entities, including FSSA and Medicaid, Byron Health Center, Logan Center, Oaklawn, and various organizations claiming to be affiliated with Portage Manor and/or St. Joseph County. This is unethical and a violation of Indiana law. Additionally, Ms. Challinor has been entering the facility and/or the facility grounds to speak with residents under the guise of meeting with "friends" to conduct recruiting efforts in the facility. She has been seen handing out business cards to residents and actively recruiting residents to leave Portage Manor. We have been informed that 6 residents are actively moving out of Portage Manor to move into St. Paul's, and several more have requested to tour St. Paul's facility at Robyn's request. (Portage Manor is still operating and St. Joseph County has not made the decision to close the facility). It is clear that her actions are self-serving and financially driven to obtain additional compensation from St. Paul's. These actions, at a minimum, amount to tortious interference with business relations and tortious interference with contracts. Ms. Challinor's harassing actions are creating issues with the staff and harming the residents. These actions will likely create conditions that will cause liability for St. Joseph County.

Further, the County is in the process of attempting to find a buyer to take over the operations of Portage Manor. By unethically and illegally soliciting residents to move out of the facility, she and St. Paul's are directly harming the income stream of the facility. These actions are causing a hardship

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for the facility by diverting revenue away from the facility that is necessary to care for the residents. The actions by Ms. Challinor on behalf of St. Paul's is also devaluing the operations of Portage Manor and will likely drive away potential buyers.

These actions are wholly inappropriate and amount to tortious interference with contracts and business relations. In the event Ms. Challinor does not cease and desist her actions, all necessary action will be taken, including filing a formal complaint with the Indiana Attorney General and the Indiana licensing agency that licenses Ms. Challinor and St. Paul's, filing suit against Ms. Challinor seeking a restraining order and an injunction, as well as bringing suit against Trinity Health / St. Paul's for tortious interference, indemnification for any actions brought against St. Joseph County and all other relevant claims. I would ask that you confirm in writing that Ms. Challinor will cease and desist her actions.

Should there be any further questions or concerns related to this issue, I would ask that you reach out to me directly.

Best regards,

ANDERSON AGOSTINO & KELLER, PC

A handwritten signature in black ink, appearing to read 'Michael P. Misch', is written over the printed name.

Michael P. Misch
St. Joseph County Attorney

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