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March 16, 2023

Dear Robyn:

I am writing to you on behalf of St. Joseph County, Indiana, and specifically in relation to its department, Portage Manor. Please direct all future correspondence related to this matter to my attention.

The County recently received information that you have been 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, you have 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. You have been seen handing out your St. Paul's business card 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 your request. It is clear that your actions are self-serving and financially driven to obtain additional compensation from your current employer. These actions, at a minimum, amount to tortious interference with business relations and tortious interference with contracts. Your 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 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, you are directly harming the income stream of the facility. These actions are causing a hardship for the facility by diverting revenue away from the facility that is necessary to care for the residents. Your actions also devalue the operations of Portage Manor and will likely drive away potential buyers.

This correspondence is to put you on notice that you need to immediately cease and desist any and all contact with Portage Manor and any outside entities claiming to be affiliated with Portage Manor. You are now forbidden from entering the facility and its grounds, and if you attempt to enter the Portage Manor property you are trespassing. If necessary, we will

¹ In the event a resident requests to meet with you, arrangements can be made for the resident to meet with you off property.

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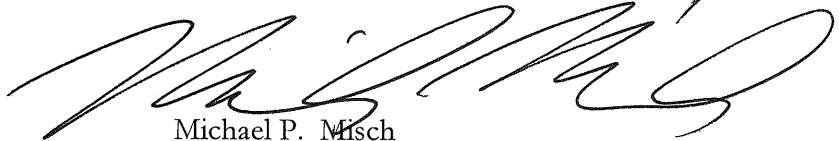
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contact the police to have you removed. If you do not discontinue these actions, the County will take all necessary legal action against you, as well as your employer, St. Paul's, to recover for any harm caused and to prevent any additional harm moving forward.

Should you have any questions or concerns related to this issue, please direct all correspondence to my office.

Best regards,

ANDERSON AGOSTINO & KELLER, PC

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

Michael P. Misch
St. Joseph County Attorney

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