

**From:** [Hill, Richard W.](#)  
**To:** [Fick, Mackinzev](#)  
**Subject:** RE: CON 6206 NS  
**Date:** Friday, May 23, 2025 11:02:32 AM  
**Attachments:** [image001.png](#)  
[RE Chapters Joplin - Addition of SNF Services.msg](#)  
[CON Construction Budget Letter 05222025.pdf](#)  
[Bed Count - 5-23-25\(3183845.3\).xlsb](#)  
[6206 NS - Updated Application Pages - 5-23-25\(3209593.1\).pdf](#)  
[Updated Floor Plan - 5-23-25\(3209581.1\).pdf](#)

---

Mackinzev:

Please see below in red. Thanks!

Rich

- Provide 3<sup>rd</sup> party documents or methods/assumptions for the renovation and equipment costs.
  - Please see attached.
- For utilization on year 3 after completion, I calculate 87.4%. Please advise.
  - The applicant received the attached email from David East and Carrie Schaumburg advising that it is no longer possible to reinstate the original SNF bed count that existed at the facility. As such, the applicant has had to reduce its requested bed count to comply with what is feasible from a licensure perspective. Please see the attached, revised application pages and SSRE form. Occupancy was calculated as [Anticipated Resident Days / (365 \* 76 licensed beds)].
- The bed listing states 102 beds and I am unable to verify with the schematics. Please advise.
  - The applicant received the attached email from David East and Carrie Schaumburg advising that it is no longer possible to reinstate the original SNF bed count that existed at the facility. As such, the applicant has had to reduce its requested bed count to comply with what is feasible from a licensure perspective. Please see the attached, revised bed count and floorplan documents. For the floorplan, single occupancy is colored in yellow, and double occupancy is colored in green.
- The letter from Tyler Brady does not appear to be sufficient documentation for unrestricted funds. 19 CSR 60-50.470 (2) Document that sufficient financing will be available to assure completion of the project by providing a letter from a financial institution saying it is willing to finance the project, or an auditor's statement that unrestricted funds are available for the project.
  - I anticipate this will be coming later today, but wanted to make sure you received the remainder this morning.

RICHARD W. HILL  
Attorney at Law  
DIRECT: 314 436.8317  
CELL: 314 749 2396  
[rhill@lashlybaer.com](mailto:rhill@lashlybaer.com)  
Licensed in Missouri

**LASHLY & BAER, P.C.**

*Attorneys at Law*

714 Locust Street St. Louis, MO 63101-1699 TEL: 314 621.2939  
20 East Main Street Belleville, IL 62220-1602 TEL: 618 233.5587  
FAX: 314 621.6844 [www.lashlybaer.com](http://www.lashlybaer.com)

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**From:** Fick, Mackinze <Mackinze.Fick@health.mo.gov>

**Sent:** Tuesday, May 13, 2025 9:36 AM

**To:** Hill, Richard W. <RHill@lashlybaer.com>

**Subject:** CON 6206 NS

**Importance:** High

Rich,

After review of the application, some additional information is needed.

- Provide 3<sup>rd</sup> party documents or methods/assumptions for the renovation and equipment costs.
- For utilization on year 3 after completion, I calculate 87.4%. Please advise.
- The bed listing states 102 beds and I am unable to verify with the schematics. Please advise.
- The letter from Tyler Brady does not appear to be sufficient documentation for unrestricted funds. 19 CSR 60-50.470 (2) Document that sufficient financing will be available to assure completion of the project by providing a letter from a financial institution saying it is willing to finance the project, or an auditor's statement that unrestricted funds are available for the project.

**This information is needed by Friday, May 23<sup>rd</sup>, 2025.**



*Mackinze Fick*

Assistant Program Coordinator

Certificate of Need Agency :

<http://health.mo.gov/information/boards/certificateofneed/index.php>

Missouri Department of Health and Senior Services

920 Wildwood Drive, Jefferson City, MO. 65102

✉: [mackinze.fick@health.mo.gov](mailto:mackinze.fick@health.mo.gov) | ☎: 573-751-6403

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# **CERTIFICATE OF NEED APPLICATION**

## **CHAPTERS LIVING OF JOPLIN – ADD SNF SERVICES**

On Behalf Of

**201 S NORTHPARK JOPLIN LLC & CHAPTERS JOPLIN OPCO, LLC**



**Project No. 6206 NS**

Add 76 SNF Beds

Submitted to:

**Missouri Health Facilities Review Committee**

**May 2, 2025**

Submitted by:

**Richard Hill**

**Attorney At Law**

**Lashly & Baer, P.C.**

**714 Locust Street**

**St. Louis, MO 63101**

**8. Document ownership of the project site, or provide an option to purchase.**

See attached.

**9. Define the community to be served.**

The community to be served is the 65 and older population located within a 15-mile radius of the proposed site.

**10. Provide projected year population for the 15-mile radius service area.**

There will be approximately 29,321 individuals aged 65 or older in the service area surrounding the project, based on the State of Missouri's 2030 population estimates.

**11. Identify specific community problems or unmet needs the proposal would address.**

There is a significant unmet need for additional skilled nursing beds in the service area pursuant to the Committee's formula.

**12. Provide historical utilization for each of the past three (3) FULL years and utilization projections through the first three (3) FULL years of operation of the new LTC beds.**

The SNF has been closed for more than one year, and as such, there is no historical utilization to present. Please see the projected utilization below.

Year 1 – 46.1% Occupancy; 12,775 resident days

Year 2 – 75.0% Occupancy; 20,805 resident days

Year 3 – 92.0% Occupancy; 25,520 resident days

**13. Provide the methods and assumptions used to project utilization.**

The methods and assumptions used to project utilization and projections were based on the Applicant's historical experience with similar operations. The Applicant also anticipates that its existing independent living and assisted living operations will generate utilization for the skilled nursing facility.

**14. Document that consumer needs and preferences have been included in planning this project and describe how consumers had an opportunity to provide input.**

Please see the attached notification published in the Joplin Globe on April 23, 2025, which invites consumers to submit commentary with respect to this project.

**15. Provide copies of any petitions, letters of support or opposition received.**

The Applicant will provide letters or petitions as it receives them.



**From:** [Schaumburg, Carrie](#)  
**To:** [East, David](#); [Hill, Richard W.](#)  
**Subject:** RE: Chapters Joplin - Addition of SNF Services  
**Date:** Monday, May 5, 2025 1:16:40 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image004.png](#)  
[image005.png](#)  
[Appendix PP SOM Dec 2024.pdf](#)

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Here is the Federal regulation reference:

**Bathroom facilities.** Each resident room must be equipped with or located near toilet and bathing facilities. For facilities that receive approval of construction from State and local authorities or are newly certified after November 28, 2016, each resident room must have its own bathroom equipped with at least a commode and sink.

<https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-483/subpart-B#483.90>

Additional information may also be found on the attached SOM regarding CMS interpretive guidance for “Jack and Jill” bathrooms on page 826.

Thank you,



**Carrie Schaumburg** | Architect  
Missouri Department of Health and Senior Services  
Engineering Consultation Unit  
P.O. Box 570, Jefferson City, MO 65102-0570  
573-526-5350 | [Carrie.Schaumburg@health.mo.gov](mailto:Carrie.Schaumburg@health.mo.gov)

**Online Reporting for Abuse and Neglect is now available. Adult abuse and neglect reports can now be made online 24/7, <https://health.mo.gov/safety/abuse/>**

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---

**From:** East, David <David.East@health.mo.gov>  
**Sent:** Monday, May 5, 2025 12:50 PM  
**To:** Hill, Richard W. <RHill@lashlybaer.com>; Schaumburg, Carrie <Carrie.Schaumburg@health.mo.gov>  
**Subject:** RE: Chapters Joplin - Addition of SNF Services

Mr. Richard Hill,

With the shared toilet room between resident rooms the facility will only be allowed 1 bed in each adjacent resident sleeping room.

Online Reporting for Abuse and Neglect is available 24/7: . <https://health.mo.gov/safety/abuse/>

For the latest information related to Long-Term Care, please subscribe [here](#) and select “LTCR: Long-Term Care Regulation” under the

Subscription Topics.



## David East

Mechanical Engineer | Missouri Department of Health and Senior Services

Email: [david.east@health.mo.gov](mailto:david.east@health.mo.gov) | Phone: 573-526-8521

[Health.Mo.Gov](http://Health.Mo.Gov)

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---

**From:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>

**Sent:** Thursday, May 1, 2025 5:17 PM

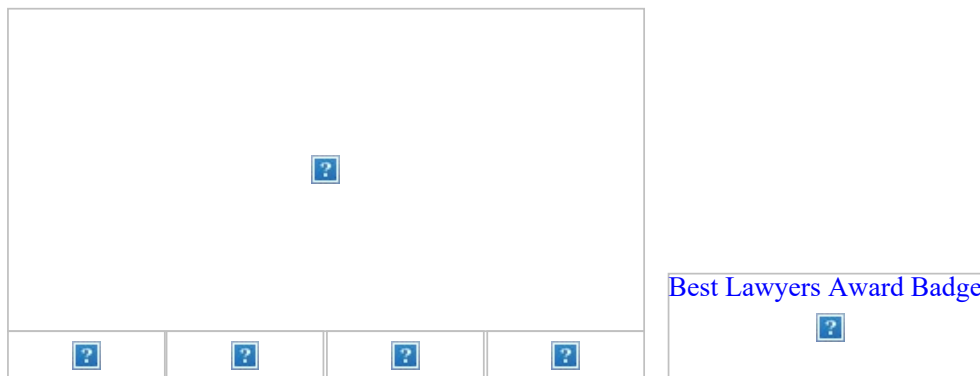
**To:** East, David <[David.East@health.mo.gov](mailto:David.East@health.mo.gov)>; Schaumburg, Carrie <[Carrie.Schaumburg@health.mo.gov](mailto:Carrie.Schaumburg@health.mo.gov)>

**Subject:** Chapters Joplin - Addition of SNF Services

David and Carrie:

Chapters Joplin is applying for CON approval to reopen SNF services at its 201 S Northpark Lane, Joplin, MO 64801 location. Please see the attached schematic showing the location of all 103 beds they are applying for, as well as table showing the location of those beds by room number. Please let me know if you have any questions or concerns. Thanks!

Rich



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**Chapters Senior Living**  
**New SNF**  
**Bed Amount and Locations**

**Table 1 - Original Submission**

	A	B	C
	Room	Beds	Station
1	1	1	Station 1
2	2	1	Station 1
3	3	1	Station 1
4	4	1	Station 1
5	5	1	Station 1
6	6	1	Station 1
7	7	1	Station 1
8	8	1	Station 1
9	9	1	Station 1
10	10	1	Station 1
11	11	1	Station 1
12	12	1	Station 1
13	13	1	Station 1
14	14	1	Station 1
15	15	1	Station 1
16	16	1	Station 1
17	17	1	Station 1
18	18	1	Station 1
19	19	1	Station 1
20	20	1	Station 1
21	21	1	Station 1
22	22	1	Station 1
23	23	1	Station 1
24	24	1	Station 2
25	25	2	Station 2
26	26	2	Station 2
27	27	2	Station 2
28	29	2	Station 2
29	31	2	Station 2
30	32	2	Station 2
31	33	2	Station 2
32	34	2	Station 2
33	35	2	Station 2
34	36	1	Station 2
35	37	2	Station 2
36	38	1	Station 2
37	39	2	Station 2
38	41	2	Station 2
39	42	2	Station 2
40	43	2	Station 2
41	44	2	Station 2
42	45	2	Station 2
43	46	2	Station 2
44	47	2	Station 2

**Table 2 - Revisions Following ECU Response**

	A	B	C
	Room	Beds	Station
1	1	1	Station 1
2	2	1	Station 1
3	3	1	Station 1
4	4	1	Station 1
5	5	1	Station 1
6	6	1	Station 1
7	7	1	Station 1
8	8	1	Station 1
9	9	1	Station 1
10	10	1	Station 1
11	11	1	Station 1
12	12	1	Station 1
13	13	1	Station 1
14	14	1	Station 1
15	15	1	Station 1
16	16	1	Station 1
17	17	1	Station 1
18	18	1	Station 1
19	19	1	Station 1
20	20	1	Station 1
21	21	1	Station 1
22	22	1	Station 1
23	23	1	Station 1
24	24	1	Station 2
25	25	1	Station 2
26	26	2	Station 2
27	27	1	Station 2
28	29	1	Station 2
29	31	1	Station 2
30	32	2	Station 2
31	33	1	Station 2
32	34	2	Station 2
33	35	1	Station 2
34	36	1	Station 2
35	37	1	Station 2
36	38	1	Station 2
37	39	1	Station 2
38	41	1	Station 2
39	42	2	Station 2
40	43	1	Station 2
41	44	1	Station 2
42	45	1	Station 2
43	46	1	Station 2
44	47	1	Station 2

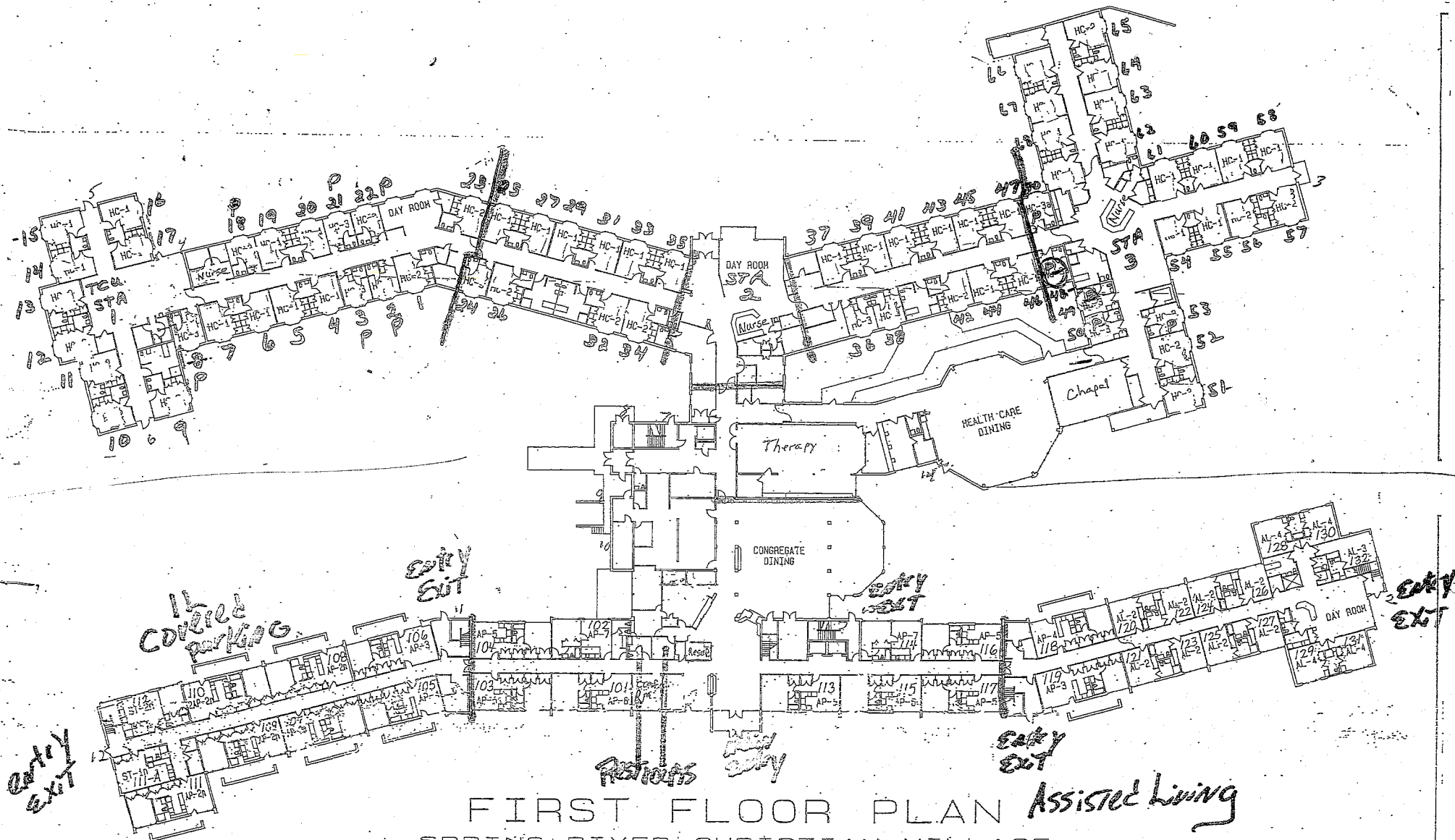
Chapters Senior Living  
New SNF  
Bed Amount and Locations

Table 1 - Original Submission

	A	B	C
	Room	Beds	Station
45	48	1	Station 3
46	49	1	Station 3
47	50	1	Station 3
48	51	2	Station 3
49	52	2	Station 3
50	53	1	Station 3
51	54	2	Station 3
52	55	2	Station 3
53	56	2	Station 3
54	57	2	Station 3
55	58	2	Station 3
56	59	2	Station 3
57	60	2	Station 3
58	61	2	Station 3
59	62	2	Station 3
60	63	2	Station 3
61	64	2	Station 3
62	65	1	Station 3
63	66	2	Station 3
64	67	2	Station 3
65	68	2	Station 3
66	69	2	Station 3
67	70	1	Station 3

Table 2 - Revisions Following ECU Response

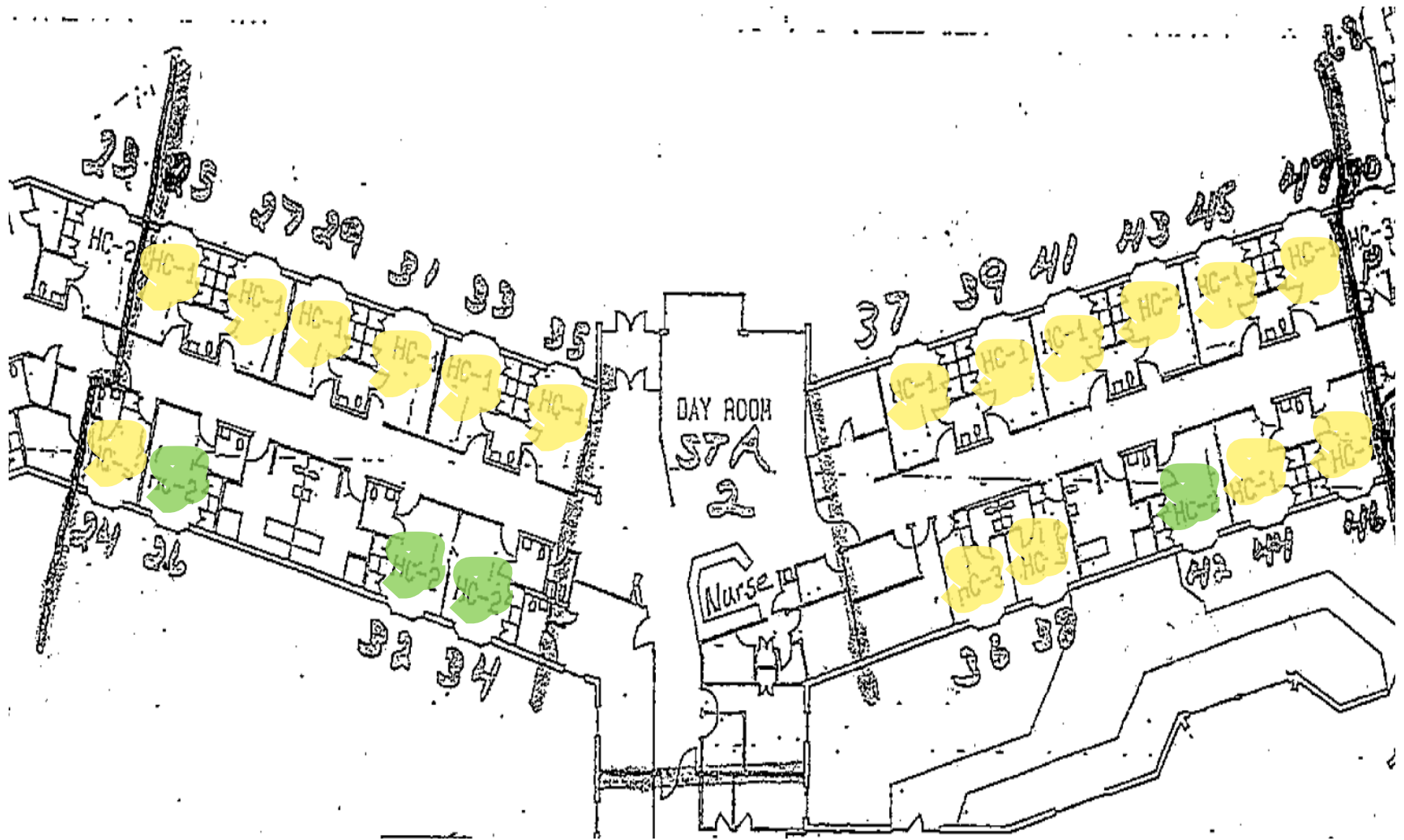
	A	B	C
	Room	Beds	Station
45	48	1	Station 3
46	49	1	Station 3
47	50	1	Station 3
48	51	2	Station 3
49	52	2	Station 3
50	53	1	Station 3
51	54	1	Station 3
52	55	1	Station 3
53	56	2	Station 3
54	57	2	Station 3
55	58	1	Station 3
56	59	1	Station 3
57	60	1	Station 3
58	61	1	Station 3
59	62	1	Station 3
60	63	1	Station 3
61	64	2	Station 3
62	65	1	Station 3
63	66	1	Station 3
64	67	1	Station 3
65	68	1	Station 3
66	69	1	Station 3
67	70	1	Station 3



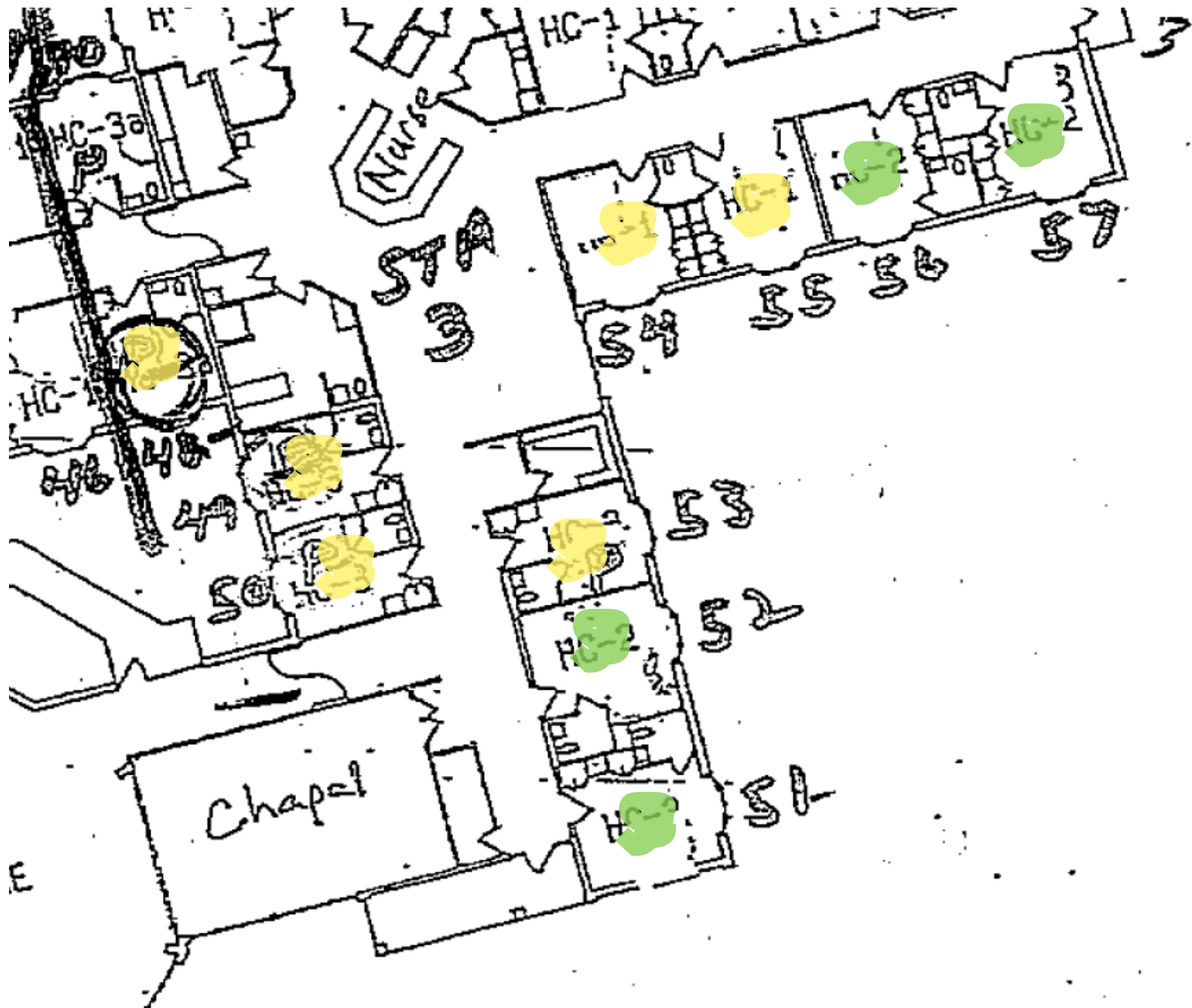
FIRST FLOOR PLAN Assisted Living  
 SPRING RIVER CHRISTIAN VILLAGE  
 SCALE 1" = 40'-0"

11  
 parking

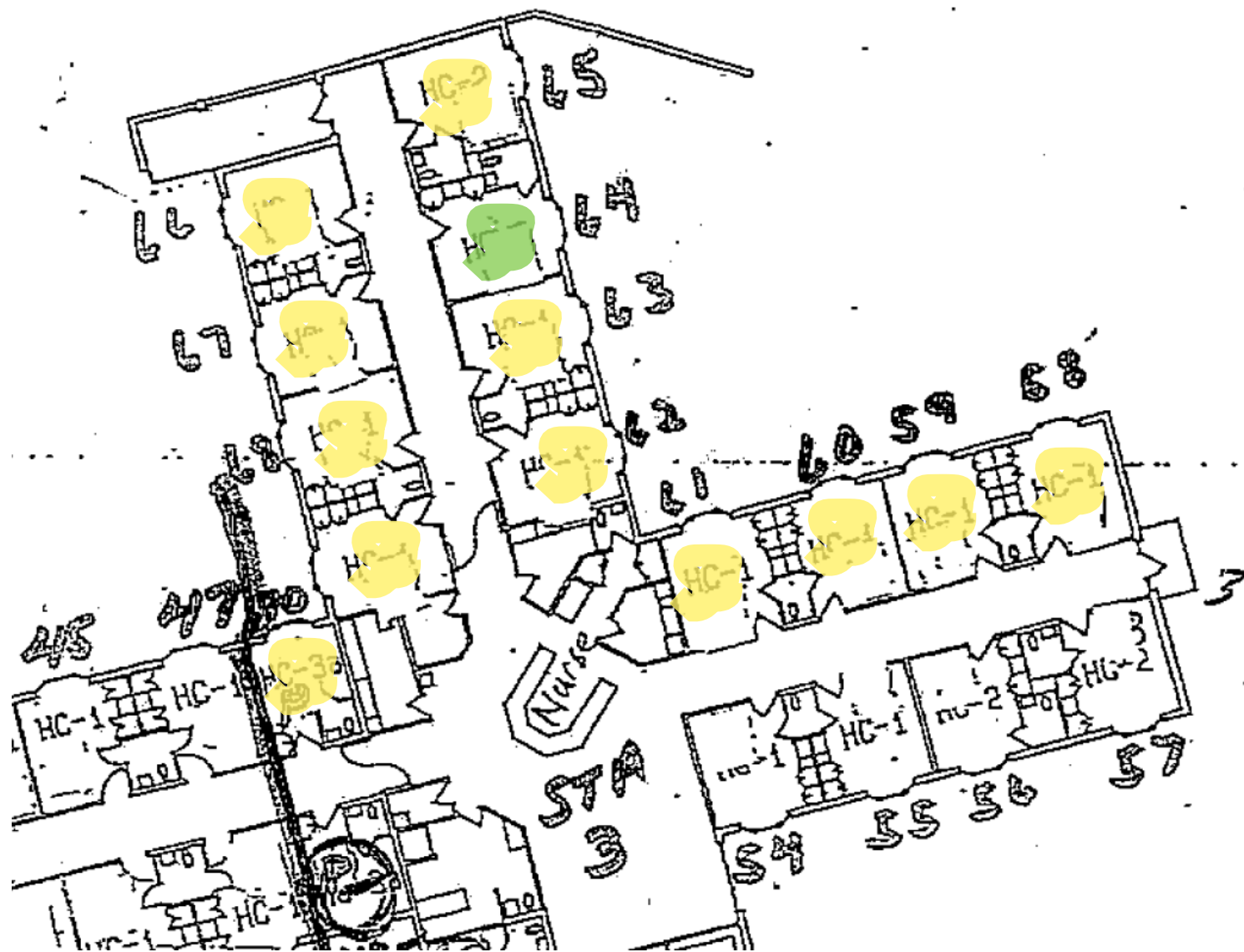














May 23, 2025

Missouri CON Program  
P.O. Box 570  
Jefferson City, MO 65102

**Re: Certificate of Need Project #6206 NS**

To Whom It May Concern:

We are excited about the potential to expand our recently acquired community to offer skilled nursing services again and honoring the commitment to the existing residents to truly age in place. We have put together cost estimates based on recent experience in upgrading other similar communities that needed capital improvement to meet the current market needs. Given that the existing space is in good condition, the upgrades required do not require major construction or engineering, and most upgrades are isolated to certain areas—not community wide (i.e., floor is not needed everywhere). Below is a breakout of the construction budget:

• Flooring: Materials and Installation (15,000 sq ft):	\$90,000
• Paint:	\$45,000
• Upgraded Front Reception Area:	\$25,000
• HVAC/H Upgrades:	\$30,000
• Wi-Fi and Technology Upgrades:	\$15,000
• Plumbing and Electrical Repair Allowance	\$35,000
• Upgraded Nurse Call System:	\$35,000
• Exterior Parking Lot Repair:	\$50,000
• <u>Exterior Landscaping Repair:</u>	<u>\$25,000</u>
Total Construction Costs:	\$350,000

Thank you for your time in reviewing the above, and please reach out with any questions on the project budget.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Stricker", is written over the printed name.

Daniel Stricker  
CEO

**From:** [Hill, Richard W.](#)  
**To:** [Fick, Mackinze](#)  
**Subject:** RE: CON 6206 NS  
**Date:** Monday, May 19, 2025 4:36:09 PM  
**Attachments:** [image001.png](#)

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Mackinze

We agree with your calculations. Thanks!

Rich

RICHARD W. HILL  
Attorney at Law  
DIRECT: 314 436.8317  
CELL: 314 749 2396  
[rhill@lashlybaer.com](mailto:rhill@lashlybaer.com)  
Licensed in Missouri

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*Attorneys at Law*

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20 East Main Street Belleville, IL 62220-1602 TEL: 618 233.5587  
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**From:** Fick, Mackinze <Mackinze.Fick@health.mo.gov>  
**Sent:** Friday, May 16, 2025 3:31 PM  
**To:** Hill, Richard W. <RHill@lashlybaer.com>  
**Subject:** CON 6206 NS  
**Importance:** High

Rich,

We reviewed the population-based need calculation presented in the CON application and the population we arrived at is 29,392 (attached). We agree with your number of beds in the applicants 15-mile radius. Therefore, we calculated **a bed need of 770 ICF/SNF beds** within 15 miles of the site. Let me know if you agree or disagree with our findings.

**This information is needed by Friday, May 23<sup>rd</sup>, 2025.**



*Mackinzezy Fick*

Assistant Program Coordinator

Certificate of Need Agency :

<http://health.mo.gov/information/boards/certificateofneed/index.php>

Missouri Department of Health and Senior Services

920 Wildwood Drive, Jefferson City, MO. 65102

✉: [mackinzezy.fick@health.mo.gov](mailto:mackinzezy.fick@health.mo.gov) | ☎: 573-751-6403

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**From:** [Hill, Richard W.](#)  
**To:** [Fick, Mackinzey](#)  
**Subject:** RE: 6206 NS  
**Date:** Wednesday, June 11, 2025 10:49:31 AM  
**Attachments:** [image001.png](#)

---

Mackinzey:

BEH, LLC is an upstream owner of the 201 S Northpark Joplin LLC entity, which is an applicant for project 6206 NS.

Rich

RICHARD W. HILL  
Attorney at Law  
DIRECT: 314 436.8317  
CELL: 314 749 2396  
[rhill@lashlybaer.com](mailto:rhill@lashlybaer.com)  
Licensed in Missouri

**LASHLY & BAER, P.C.**

*Attorneys at Law*

714 Locust Street St. Louis, MO 63101-1699 TEL: 314 621.2939  
20 East Main Street Belleville, IL 62220-1602 TEL: 618 233.5587  
FAX: 314 621.6844 [www.lashlybaer.com](http://www.lashlybaer.com)

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**From:** Fick, Mackinzey <[Mackinzey.Fick@health.mo.gov](mailto:Mackinzey.Fick@health.mo.gov)>  
**Sent:** Tuesday, June 10, 2025 3:59 PM  
**To:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>  
**Subject:** RE: 6206 NS

Rich,

Can you explain how BEH, LLC is affiliated with the owner/operator listed on the project.

Thank you!



**Mackinzey Fick** (Last Day in CON will be 6/16)

Assistant Program Coordinator

Certificate of Need Agency : <http://health.mo.gov/information/boards/certificateofneed/index.php>

Missouri Department of Health and Senior Services

920 Wildwood Drive, Jefferson City, MO. 65102

✉: [mackinzey.fick@health.mo.gov](mailto:mackinzey.fick@health.mo.gov) | ☎: 573-751-6403

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---

**From:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>  
**Sent:** Tuesday, June 10, 2025 3:31 PM  
**To:** Fick, Mackinze <[Mackinze.Fick@health.mo.gov](mailto:Mackinze.Fick@health.mo.gov)>  
**Cc:** Dorge, Alison <[Alison.Dorge@health.mo.gov](mailto:Alison.Dorge@health.mo.gov)>; CONP CONP <[CONP@health.mo.gov](mailto:CONP@health.mo.gov)>  
**Subject:** RE: 6206 NS

Mackinze:

Please see attached. Please let me know if you have any questions or concerns. Thanks!

Rich

RICHARD W. HILL  
Attorney at Law  
DIRECT: 314 436.8317  
CELL: 314 749 2396  
[rhill@lashlybaer.com](mailto:rhill@lashlybaer.com)  
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**L A S H L Y   &   B A E R ,   P . C .**

*Attorneys at Law*

714 Locust Street St. Louis, MO 63101-1699 TEL: 314 621.2939  
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---

**From:** Fick, Mackinze <[Mackinze.Fick@health.mo.gov](mailto:Mackinze.Fick@health.mo.gov)>  
**Sent:** Thursday, June 5, 2025 3:43 PM  
**To:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>  
**Subject:** 6206 NS

Rich,

After additional review of the application, some additional information/clarification is needed.

- The letter from Tyler Brady does not appear to be sufficient documentation for unrestricted funds. 19 CSR 60-50.470 (2) Document that sufficient financing will be available to assure completion of the project by providing a letter from a financial institution saying it is willing to finance the project, or an auditor's statement that unrestricted funds are available for the project.

**This information is needed as soon as possible but no later than  
June 11, 2025.**



*Mackinzey Fick*

Assistant Program Coordinator

Certificate of Need Agency : <http://health.mo.gov/information/boards/certificateofneed/index.php>

Missouri Department of Health and Senior Services

920 Wildwood Drive, Jefferson City, MO. 65102

✉: [mackinzey.fick@health.mo.gov](mailto:mackinzey.fick@health.mo.gov) | ☎: 573-751-6403

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**Pessy C Weber, CPA  
120 Regent Place  
Lakewood, NJ 08701  
732-942-9156**

June 10, 2025

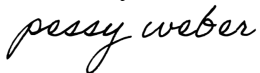
To Whom It May Concern:

I am the accountant for BEH LLC. This letter is to confirm that BEH LLC and its partners have entered into an agreement to fund the entity on a pro rata basis in order to meet its financial obligations related to Certificate of Need Project #6206 NS. Specifically, the partners have committed to contribute capital in the amount of \$400,000.

As further support, a recent bank statement from the managing member was reviewed, demonstrating sufficient available cash to fund the contributions, if needed.

Please feel free to contact us should you require any additional information or documentation.

Sincerely,

A handwritten signature in cursive script that reads "pessy weber".

*Pessy C Weber, CPA*



**From:** [Hill, Richard W.](#)  
**To:** [Fick, Mackinzey](#)  
**Subject:** RE: 6206 NS  
**Date:** Wednesday, June 11, 2025 11:41:09 AM  
**Attachments:** [image001.png](#)

---

Mackinzey:

I believe application page 7 has a budget detail.

Line 1 lists the existing premises value (\$200,000), which is not an expenditure. Per the application, the Applicant already owns the land and building. There will be no cash outlay for this line item.

Line 6 lists estimated contingency expenditures (\$52,500), which are not certain to ever occur.

Lines 2 through 5 amount to \$397,500 and consist of the actual costs for the project. The BEH contribution amount is sufficient to cover those costs.

Rich

RICHARD W. HILL  
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**L A S H L Y   &   B A E R ,   P . C .**

*Attorneys at Law*

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**From:** Fick, Mackinzey <Mackinzey.Fick@health.mo.gov>  
**Sent:** Wednesday, June 11, 2025 11:19 AM  
**To:** Hill, Richard W. <RHill@lashlybaer.com>  
**Subject:** RE: 6206 NS  
**Importance:** High

Rich,

Can you provide financial documentation for the remaining \$250,000? The letter from Pessy states only \$400,000 will be contributed.



# Certificate of Need Program

## SERVICE-SPECIFIC REVENUES AND EXPENSES

**Project Title:**

**Project #:**

**Historical Financial Data for Latest Three Full Years plus  
Projections Through Three Full Years Beyond Project Completion**

*Use an individual form for each affected service with a  
sufficient number of copies of this form to cover entire period,  
and fill in the years in the appropriate blanks.*

**Year**

**Amount of Utilization:\***

**Revenue:**

Average Charge\*\*

Gross Revenue

Revenue Deductions

Operating Revenue

Other Revenue

**TOTAL REVENUE**

**Expenses:**

Direct Expenses

Salaries

Fees

Supplies

Other

**TOTAL DIRECT**

Indirect Expenses

Depreciation

Interest\*\*\*

Rent/Lease

Overhead\*\*\*\*

**TOTAL INDIRECT**

**TOTAL EXPENSES**

**NET INCOME (LOSS):**

\*Utilization will be measured in "patient days" for licensed beds, "procedures" for equipment,  
or other appropriate units of measure specific to the service affected.

\*\*Indicate how the average charge/procedure was calculated.

\*\*\*Only on long term debt, not construction.

\*\*\*\*Indicate how overhead was calculated.

**From:** [Hill, Richard W.](#)  
**To:** [Fick, Mackinze](#)  
**Cc:** [CONP.CONP](#); [Dorge, Alison](#)  
**Subject:** RE: 6210 RS  
**Date:** Wednesday, June 18, 2025 8:15:27 AM  
**Attachments:** [image001.png](#)  
[Updated SSRE - 6-18-25\(3235130.1\).pdf](#)

---

Mackinze:

My apologies – my client gave me the updated SSRE back on May 23, but it looks like I inadvertently left it out of the previous response email. Please see attached.

I'll follow up with the land value as soon as I can.

Rich

RICHARD W. HILL  
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**From:** Fick, Mackinze <Mackinze.Fick@health.mo.gov>  
**Sent:** Tuesday, June 17, 2025 3:45 PM  
**To:** Hill, Richard W. <RHill@lashlybaer.com>  
**Subject:** 6210 RS

Rich,

After additional review of the application, some additional items are needed.

- Provide methods/assumptions or 3<sup>rd</sup> party documentation of land acquisition costs.
- Provide an updated revenues and expenses form for the 76 beds.

**This information is needed by June 23, 2025.**

**From:** [Hill, Richard W.](#)  
**To:** [Dorge, Alison](#); [Fick, Mackinzey](#)  
**Subject:** RE: 6210 RS  
**Date:** Tuesday, June 24, 2025 11:33:07 AM  
**Attachments:** [image001.png](#)

---

My client confirmed my understanding. Thanks!

Rich

RICHARD W. HILL  
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**From:** Hill, Richard W.  
**Sent:** Tuesday, June 24, 2025 11:10 AM  
**To:** Dorge, Alison <[Alison.Dorge@health.mo.gov](mailto:Alison.Dorge@health.mo.gov)>; Fick, Mackinzey <[Mackinzey.Fick@health.mo.gov](mailto:Mackinzey.Fick@health.mo.gov)>  
**Subject:** RE: 6210 RS

Alison:

I'll check with my client, I believe the answer to your question in the last sentence of your email is yes. Subject to me checking with my client, my current understanding is below.

Chapters assigned a value on the property primarily based on the income method for property valuation. At the time of purchase the SNF vacant and not generating income. But I understand that the value was further depressed because to validly operate the SNF, Chapters will need to undergo this CON proceeding and the licensure process. In other words, not only was the SNF not generating income, but it was not possible to generate income at the SNF without further regulatory work, the result of which is still unclear.

Rich

RICHARD W. HILL  
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**From:** Dorge, Alison <[Alison.Dorge@health.mo.gov](mailto:Alison.Dorge@health.mo.gov)>

**Sent:** Tuesday, June 24, 2025 11:04 AM

**To:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>; Fick, Mackinze <[Mackinze.Fick@health.mo.gov](mailto:Mackinze.Fick@health.mo.gov)>

**Subject:** RE: 6210 RS

Rich,

I am trying to understand how the SNF space is only valued at \$200k out of the total \$3.3 million for the entire IL, ALF and SNF space for 132 total units---the SNF alone has 67 units. The letter states, "A value of \$3,300,000, or 25,000 was assigned on our balance sheet for the operating units that generate positive net operating income (NOI). The vacant skilled nursing facility was assigned a value of 200,000, or \$2,631 per potential bed." Is the SNF valued lower since it is vacant and not generating NOI at this time compared to the ALF & IL occupied beds?

-Alison

---

**From:** Hill, Richard W. <[RHill@lashlybaer.com](mailto:RHill@lashlybaer.com)>

**Sent:** Tuesday, June 24, 2025 10:27 AM

**To:** Fick, Mackinze <[Mackinze.Fick@health.mo.gov](mailto:Mackinze.Fick@health.mo.gov)>

**Cc:** Dorge, Alison <[Alison.Dorge@health.mo.gov](mailto:Alison.Dorge@health.mo.gov)>; CONP CONP <[CONP@health.mo.gov](mailto:CONP@health.mo.gov)>

**Subject:** RE: 6210 RS

Mackinze:

Please find methods regarding land acquisition costs in the attached letter. Thanks.

Rich

RICHARD W. HILL  
Attorney at Law  
DIRECT: 314 436.8317  
CELL: 314 749 2396  
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*Attorneys at Law*

714 Locust Street St. Louis, MO 63101-1699 TEL: 314 621.2939



June 23, 2025

Missouri CON Program  
P.O. Box 570  
Jefferson City, MO 65102

**Re: Certificate of Need Project #6206 NS**

To Whom It May Concern:

We purchased the legacy Spring River Christian Village on February 6, 2025, for \$3,500,000. This value was generated using the existing net operating income of the operational independent living, assisted living and memory care units, totaling 132 units in operation. A value of \$3,300,000, or 25,000 was assigned on our balance sheet for the operating units that generate positive net operating income (NOI). The vacant skilled nursing facility was assigned a value of 200,000, or \$2,631 per potential bed.

We are excited about the potential to expand our recently acquired community to offer skilled nursing services again and honoring the commitment to the existing residents to truly age in place. Please let us know if you have any further questions on this acquisition valuation.

Thank you for your time in reviewing the above, and please reach out with any questions on the allocation of value we utilized at acquisition.

Respectfully,

A handwritten signature in black ink that reads "Daniel Stricker".

Daniel Stricker  
CEO