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May 24, 2011

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MAY 25 2011

HEALTH FACILITIES &
SERVICES REVIEW BOARD

**FEDERAL EXPRESS
ELECTRONIC MAIL**

Mr. Dale Galassie
Chair
Illinois Health Facilities and Services Review
Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

Re: Southern Illinois Surgery Center (Proj. No. E-001-11)

Dear Mr. Galassie:

As you are aware, Cirurgia Centro, LLC ("Cirurgia") has a pending application with the Health Facilities and Services Review Board (the "CON Board") for an exemption for the change of ownership of the Surgery Center of Southern Illinois (the "Marion Surgery Center"). I am writing in response to several issues raised during the April 5, 2011 public hearing conducted by the CON Board staff for this project (the "Public Hearing") and submitting additional information to clarify the facts.

Cirurgia's application for exemption complies with the CON Board requirements for a certificate of exemption. Cirurgia is fit, willing and able, and has the qualifications, background, and character, to adequately provide for a proper standard of health care service for the community. Cirurgia is an organization registered with the Illinois Secretary of State to do business in the State of Illinois and qualified to operate a surgery center. Ronald Osman, the principal of Cirurgia, has experience in managing and operating health care facilities. Cirurgia has the financial resources to fund the acquisition and operation of the Marion Surgery Center. No adverse action has been taken against Cirurgia or Ronald Osman.

With regard to one specific Public Hearing allegation, the Illinois Attorney Registration & Disciplinary Commission recently confirmed no action has been taken against Mr. Osman or is warranted based on the complaint of Dr. Maqbool Ahmad ("Dr. Ahmad") relating to a lawsuit that concluded years ago. (Exhibit A) To the contrary, Mr. Osman is known to be an upstanding member of community and has widespread

support from the community for the acquisition of the Marion Surgery Center as documented in the numerous letters of support from public officials, area physicians, health care providers, local business leaders, and members of the community. For perspective, one should understand that Dr. Ahmad has had an adversarial relationship with Mr. Osman for almost 20 years based on past legal proceedings unrelated to the proposed transaction. While the Public Hearing was attended by a significant number of people, the vast majority of the people in attendance were Dr. Ahmad's employees who were relieved of their regular duties for the day and given money for lunch.

Although he might have the CON Board believe otherwise, Dr. Ahmad's interest in interfering with this transaction is not altruistic but driven primarily from his own personal financial interests. Dr. Ahmad desires a more direct financial benefit from the surgical procedures he performs at the Marion Surgery Center than his present 30% ownership interest provides. He wants to be the direct beneficiary of all the Marion Eye Center physician referrals and to do this, in Marion, he must acquire all or most of the ownership in the Marion Surgery Center. In fact, he had attempted several times to force out the other owners of the Marion Surgery Center to no avail. Because he had been unsuccessful in his attempts to become the sole owner entitled to 100% of the profits from the Marion Surgery Center, he obtained a CON permit for the Mt. Vernon Eye Center surgery center which he opened in April 2010.

Please understand that the very reason Surgical Care Holdings, LLC decided to sell its interest in the Marion Surgery Center to Cirurgia is because of Dr. Ahmad's conduct in the period leading up to the pending transaction. Dr. Ahmad and his business associates have repeatedly claimed they will cease referring to the Marion Surgery Center if the pending transaction with Cirurgia moves forward. The truth is, however, that they pulled their referrals many months ago when Dr. Ahmad opened a competing surgery center, Mt. Vernon Eye Center. Because the Mt. Vernon Eye Center is more than 45 minutes away from Marion, by Dr. Ahmad's own actions, the Marion community has already lost access to the local delivery of the surgical services offered by the Marion Eye Center physicians.

What follows is a more detailed chronology of the events relating to Dr. Ahmad's surgery center utilization and development of his own surgery center.

Relatedly, Dr. Ahmad's attorney, Mark Silberman, made statements in his May 5, 2011 letter to the CON Board that were misleading and disingenuous. He stated that Marion Eye Center will not continue to provide care at the Surgery Center if the Change of Ownership to Cirurgia Centro and Mr. Osman is approved." At this time and for some time now, the Marion Eye Center physicians rarely, if ever, perform procedures at the Marion Surgery Center. These physicians began transferring their cases from the Marion Surgery Center to the Mt. Vernon Eye Center as soon as the Mt. Vernon Eye Center opened in April 2010.

Chronology of Events relating to Dr. Ahmad

Surgical Care Holdings, LLC is a wholly-owned limited liability company of Surgical Care Affiliates, LLC (and the two companies together are referred to as "SCA"). SCA holds 51% of the partnership interests in Marion Surgery Center as the General Partner as well as 9.5% of the limited partnership interests of the Marion Surgery Center. Since April 1, 1993, Dr. Ahmad has been a limited partner of the Marion Surgery Center and since that time has held a 30% limited partnership interest in the Marion Surgery Center. Additionally, the following doctors, who are employed by Dr. Ahmad at Marion Eye Center, either directly or indirectly own the following limited partnership interests in the Marion Surgery Center: George Ortiz, M.D. (2%), Ukeme Umana, M.D. (1%) and R. Joseph Olk, M.D. (3.5%). Dr. Ahmad performed eye surgeries at the Marion Surgery Center from April 1993 through April 2010. Drs. Ortiz, Umana, and Olk performed surgeries at the Marion Surgery Center from the beginning of their employment with Dr. Ahmad until the end of April 2010.

In March of 2007, Dr. Ahmad, through his wholly owned limited liability company, Surgical Center Holdings, LLC, filed an application (Project #07-061) with the CON Board to build and operate the Mt. Vernon Eye Center as an ASTC. The project received an intent to deny based upon several negative findings by the State Agency, with one being Criterion 1110.1540(e), Impact on Other Facilities. The State Agency Report issued for the August 28-29, 2007 Board Meeting specifically noted on page 8:

It also appears that HealthSouth Surgery Center (Marion)¹ will be adversely affected. Although this facility is not located within the GSA, the applicants anticipate removing 748 surgical cases from the ASTC. The State Agency notes the applicants documented that the 748 patients referred to HealthSouth Surgery Center within the past 12 months were patients who resided in the GSA.

Prior to the CON Board's reconsideration of the CON request, the CON Board staff issued a supplemental State Agency Report for Project #07-061 which took additional materials submitted by Dr. Ahmad into consideration. The supplemental State Agency Report once again found that the project was not in compliance with the provisions of Part 1110 and the identical finding noted above was contained on page 4 of that State Agency Report.

Notwithstanding concerns about pulling cases out of the Marion community, the CON Board approved Dr. Ahmad's CON request for new surgery center, and in the Spring of 2010, the Mt. Vernon Eye Center facility was completed and licensed by the Illinois Department of Public Health. Drs. Ahmad, Ortiz, Olk and Umana (the

¹ The CON Board approved the sale of HealthSouth Surgery Center's controlling interest to SCA in June 2007, as part of the larger national transaction.

"Doctors") immediately cancelled all their surgeries on the schedule at Marion Surgery Center (34 in total) and arranged for those patients to have surgery at the Mt. Vernon Eye Center. In many cases, Dr. Ahmad's company provided free transportation to those patients, many of whom resided in Marion, outside the Mt. Vernon Eye Center's GSA. Since the opening of the Mount Vernon Eye Center, surgical procedures performed at the Surgery Center have dropped 65% in the last year, from 289 cases per month, in the three years prior to the opening of Mt. Vernon Eye Center to approximately 102 procedures per month.

Thereafter, the Doctors' staff advised their patients that the Doctors no longer performed surgery at Marion Surgery Center and that eye surgery patients would have to travel to the Mt. Vernon Eye Center for their surgeries. Going forward, Dr. Ahmad has been directly or indirectly providing free transportation to Mt. Vernon to many patients to facilitate their referral to the Mt. Vernon Eye Center. Since the opening of Mt. Vernon Eye Center, only on occasion, if a patient insisted, would the Doctors perform a procedure at the Marion Surgery Center.

As a result of this coordinated effort by the Doctors, the total surgeries performed by the Doctors at the Marion Surgery Center decreased from 3,114 during the 12 month period of April 2009 to March 2010 to 276 for the 12 month period of April 2010 to March 2011.² Accordingly, contrary to the representations made in Permit #07-061 application, instead of 748 cases out of the Marion Illinois GSA being diverted to the Mt. Vernon Eye Center, approximately 2,800 cases per year are being diverted to Mt. Vernon by the Doctors, with the Doctors routinely providing free transportation to the patients outside Mt. Vernon Eye Center's GSA. While providing free transport has allowed the Doctor's to get Marion patients to agree to leave the Marion community for their surgeries, ultimately, Dr. Ahmad's model cannot continue this way. Thus, he wants to convert the Marion Surgery Center to one that the Doctors wholly own.

Prior to Cirurgia filing the application for exemption with the CON Board, Dr. Ahmad and Mr. Osman tendered offers to SCA for the purchase of SCA's interest in the Surgery Center. While SCA and Dr. Ahmad executed a letter of intent on December 6, 2010, the letter of intent provided that either party could "unilaterally terminate [the] Letter of Intent with or without cause, at anytime, by providing written notice to the other party." When SCA terminated the Letter of Intent with Dr. Ahmad and accepted Mr. Osman's offer, Dr. Ahmad filed suit against SCA alleging that it breached the confidentiality portions of the Letter of Intent entered into by SCA. The Doctors subsequently joined as Plaintiffs in Dr. Ahmad's action. Marion Holdings, LLC, Marion Limited, Dr. Paul Jeurgens and Dr. William Hess are also named as defendants in the action. Marion Limited has made counter-claims against Drs. Ahmad, Ortiz, Umana and

²It is important to note that 244 of these procedures were performed from December 2010 to April 2010. 32 procedures have been performed by the Doctors in 2011, with 16 procedures performed by two of the Doctors in January, 6 procedures by one of the Doctors in February and no procedures by the Doctors in March.

Olk claiming breach of fiduciary duty, tortuous interference with contract and violation of non-competition provisions contained in Marion Limited's Partnership Agreement.

It is apparent that the Doctors have engaged in a scheme to divert patients from the Marion GSA to the Mt. Vernon GSA not only for the purpose of profiting the Mt. Vernon Eye Center but also to damage Marion Limited and force a sale of its interest to Dr. Ahmad. When SCA decided to sell its interest to Ronald Osman, the Doctors began a campaign to discredit Mr. Osman and misrepresent to their patients that if Dr. Ahmad could not purchase the controlling interest of the Surgery Center they would have to leave Marion for eye care. In furtherance of that scheme, Marion Eye Center & Optical mailed two letters to all its patients (Exhibit B and C), requesting opposition to the pending Exemption Request and attendance at the Public Hearing to express that opposition. In addition each patient presenting for an appointment at any of Dr. Ahmad's multiple offices is provided a third letter seeking the patients opposition to the exemption request. (Exhibit D). As an example of the procedure used to obtain support letters from patients please note the support letter we received from Debbie Dullinger (Exhibit E) describing her recent experience when she visited Dr. Ahmad's office with a friend. While all the letters are filled with misrepresentations and misstatements, the most glaring are:

If this purchase and certificate is approved the surgeons of the Marion Eye Center and the newly hired retina surgeons will be forced to do surgery out of the Marion area . . .

...

When the surgery center came up for sale, it was our intention to purchase it so that our patients in the Marion and surrounding area, could have surgery performed close to home.

...

If this attorney who is certainly not our friend is able to accomplish this, it would force our surgeons to go elsewhere to perform surgery.

These sentiments were repeated by the Doctors at the April 5, 2011 Public hearing, with Dr. Ahmad himself stating, "So I declare today that as [sic] this man is associated with that surgery center, me, my partners, we'll not come near the center." Transcript of Public Hearing held on April 5, 2011, p. 22, lines 8-10.

The above statements are false for the following reasons:

- A) The Doctors all have privileges at the Marion Surgery Center and have for years performed surgery at the facility without complaint.

- B) The staff of Marion Surgery Center will remain the same, and at the Public Hearing, all the Doctors praised the present surgical staff of Marion Surgery Center.
- C) All of the Doctors are on staff of the two local hospitals and one other ASTC located in Marion, Illinois and they can perform their surgeries at any of these facilities.
- D) The Doctors voluntarily ceased performing surgeries at the Marion Surgery Center in April 2010, informed their patients they had to travel to Mt. Vernon and provided free transportation for this travel, failed to advise their patients of their right to have surgery at the Marion Surgery Center or other local locations and failed to advise the patients of Dr. Ahmad's financial interest in the Mt. Vernon Eye Center.
- E) The Doctors have full privileges at the Marion Surgery Center and even though they own 35% of the Marion Surgery Center, they voluntarily ceased using the Marion Surgery Center in April 2010.

The result of Dr. Ahmad's solicitation letters and the misleading statements of the Doctors has resulted in a flood of letters opposing the pending Exemption Request; however, the majority of those letters only reference the medical attributes of the Doctors and fail to address any substantive issue to be considered by the CON Board. They were obtained from medical patients through threats that the Doctors will withhold their medical services from the community if the Exemption Request is approved.

Thank you for consideration of this supplemental information. If you have any questions or need any additional information, please feel free to contact me.

Very truly yours,


Kara M. Friedman

Enclosures

cc: Ronald Osman



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
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Ronald E. Osman
Attorney at Law
1602 W. Kimmel St.
P.O. Box 939
Marion, IL 62959-1003

Springfield
April 8, 2011

Re: Ronald E. Osman
in relation to
Maqbool Ahmad
No. 2011IN01478

Dear Mr. Osman:

We have received and reviewed the enclosed communication regarding the above-mentioned matter and have determined that no action is warranted at this time. We have so advised Dr. Ahmad.

As you know, our file in this matter is private and confidential.

Thank you for your cooperation.

Very truly yours,

Gary S. Rapaport
Senior Counsel

gsr:skg
enclosure
::ODMA\PCDOCS\MAINLIB\382089\





MARION EYE CENTERS & OPTICAL

Staff

Maqbool Ahmad, M.D. • Ukeme Umana, M.D. • George Ortiz, M.D. • Meth Linwong, M.D. • Enrique Peralta, M.D.
Robert Kippenbrock, O.D. • Mark Barlow, O.D. • Dirk Bochner, O.D. • William Fix, O.D. • Lisa Hager, O.D. • Debra Hall, O.D.
Brenda Hutchison, O.D. • Michael Kalaher, O.D. • Rakhi Patel, O.D. • Mollie Raddatz, O.D. • Emily Schwengel, O.D. • Emily Skibo, O.D.
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April 1, 2011 **RECEIVED**

APR - 4 2011

Attorney Registration & Disciplinary Commission
One North Old Capitol Plaza, Stc. 333
Springfield, IL 62701

ATTY. REG. & DISC. COMM.
SPRINGFIELD

Re: Ronald E. Osman
Ronald E. Osman & Associates, Ltd.
1602 West Kimmel Street
Marion, IL 62959
(618) 997-5151
Case No. 93-4057-JLF

Gentlemen:

Enclosed is a copy of an Order entered by Judge Foreman in the case of *Ryll v. Ahmad*. As you can see from the Judge's Order, Mr. Osman was found guilty of violation of legal ethics. The attorney who defended me in that case informed me that he was going to file this claim against Mr. Osman, but, I have checked the records, and apparently it was not filed. I believe it needs to be filed and his conduct in that case needs to be brought to your attention.

Sincerely,

Maqbool Ahmad, M.D.

Enclosure



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- pler Bluff
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- oston
373-472-0181

Staff

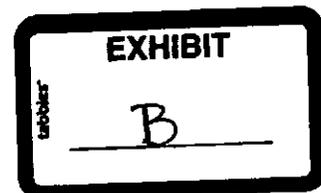
Maqbool Ahmad, M.D. • Ukeme Umana, M.D. • George Ortiz, M.D. • Meth Linwong, M.D. • Enrique Peralta, M.D.
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 Eric Weinbauer, O.D. • Beth Westall, O.D.

We are writing this letter to ask for your support. As you know Dr. Ahmad, Dr. Ortiz, Dr. Umana and more recently Dr. Oik have been seeing patients and doing surgery in Marion for more than 25 years. Recently the Marion Surgery Center had come up for sale and Dr. Ahmad had signed a letter of intent to purchase it in order for our surgeons to do surgery there and to add additional retina services. A non-physician non-healthcare entity is presently trying to undermine that purchase and has applied to the Illinois Health Planning Board for a certificate of need. If this purchase and certificate is approved the surgeons of the Marion Eye Center and the newly hired retina surgeons will be forced to do surgery out of the Marion area, and we believe that our patients which are very happy with their surgeon will then also need to travel out of the area for surgery. If this is of concern to you as a patient and member of the community we are asking that you write a letter opposing this certificate. Our surgeons and staff would truly appreciate your support by writing a letter of opposition and returning it in the enclosed envelope. You may include any of the reasons listed below or any other objections you may have.

- Inconvenience to the patient
- Patients having to travel outside the area
- Patients will travel to the facility the doctors operates in because of his experience and integrity
- Lack of retina services vitally needed in the area on a daily basis
- Ownership and decision making by a non-healthcare entity
- Unknown future of the surgery center
- Loss of jobs in our community
- Loss of revenue for the community

We apologize that the time frame for you response is needed as soon as possible. We also encourage you to attend the public hearing Tuesday, April 5, 10:00 a.m. at Marion City Council Chambers located at 1102 Tower Square, Marion.

Thank you for your support.





MARION EYE CENTERS & OPTICAL

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1-815-633-8359
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- William Fix, O.D. • Lisa Heger, O.D. • Debra Hall, O.D. • Brenda Hutchinson, O.D. • Michael Katscher, O.D. • Rakti Patel, O.D.
- Mollie Paddatz, O.D. • Emily Schwengel, O.D. • Rachel Shevmarka, O.D. • Emily Skibo, O.D. • Emily Smith, O.D. • Robert Smith, O.D.
- Geoffrey Snodden, O.D. • Shella Snodden, O.D. • Lisa Thetch, O.D. • Keith Tyhurst, O.D. • Eric Weinsauer, O.D. • Beth Westell, O.D.



To Our Loyal Patients:

This letter is to clarify a misunderstanding some may have gotten from our letter of last week. The Marion Eye Center is not for sale, nor will we be closing. We have served the community for the last 30 years and plan to serve it far into the future.

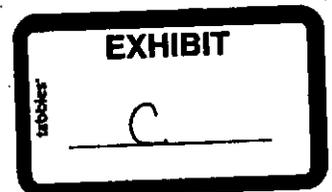
The previous letter was regarding the surgery center in Marion (SCA, Southern Illinois Surgery Center), where our surgeons have performed surgery in the past is for sale. When the surgery center came up for sale, it was our intention to purchase it so that our patients in the Marion and surrounding area, could have surgery performed close to home. With the addition of two retina surgeons, it was also our goal to expand our retina services in the area, which are vitally needed.

An attorney in Marion, who is not our friend, has tried to undermine our purchase and has applied to the Illinois Planning Board for a Certificate of Need Exemption. If this attorney who is certainly not our friend is able to accomplish this, it would force our surgeons to go elsewhere to perform surgery. We believe this to be a detriment to the patients and our community for the following reasons:

- Inconvenience to the patient
- Patients having to travel outside the area
- Patients will travel to another facility where the doctors operate because they trust their experience and integrity
- Lack of retina services vitally needed in the area on a daily basis
- Ownership and decision making by a non-healthcare entity
- Unknown future of the surgery center
- Loss of jobs in our community
- Loss of revenue for the community

The Illinois Health Planning Board has scheduled a hearing to get feedback from the community. We encourage you to attend the public hearing Tuesday April 5, 10:00 a.m., at Marion City Council Chamber located at 1102 Tower Square, Marion, Illinois. If you can't attend but would like to write a letter of opposition and return it in the enclosed envelope, it would be truly appreciated.

To the many that have already returned their letters, thank you so much for your support.





MARION EYE CENTERS & OPTICAL

Staff

Maqbool Ahmad, M.D. • Faisal Ahmad, M.D. • Omar Ahmad, M.D. • Ukeme Umama, M.D. • George Ortiz, M.D. • Meib Linzong, M.D.
Robert Kippenbrock, O.D. • Mark Barlow, O.D. • Michael Billings, O.D. • Dirk Bochner, O.D. • Micah Brasel, O.D. • Dolly Campbell, O.D.
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Streatorville
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Vandellia
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Vianon
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1-573-653-2020

Dexter
1-573-624-4584

Poplar Bluff
1-573-686-5865

Sikeston
1-573-472-8181

Dear Patients,

As you may already know, my plans to purchase the Marion surgery center (where we do surgery here in Marion, not the office), were thwarted when a local attorney, Ronald Osman, went around me and negotiated a deal to purchase the very same surgery center I was in the process of buying. However, given the importance of ensuring there is access to quality healthcare in the community, this change of ownership must be approved by a state board called the Health Facilities and Services Review Board.

I am opposing this change of ownership and invite you to do the same if you believe, as I do, that this change of ownership would impair access to healthcare in Marion and the surrounding communities, rather than improve it or even maintain it. In deciding whether or not to oppose this project, I feel it is important for you to understand why I oppose the sale of Marion Surgery Center to Mr. Osman.

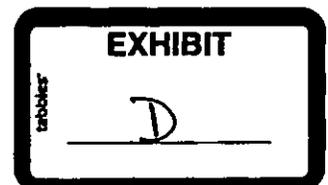
I do not trust Ronald Osman. I have had prior business dealings with Mr. Osman. He was, infact, my attorney. Despite being my attorney, he filed a lawsuit against me using the same information which he provided to me as my attorney, which was thrown out, but not before Mr. Osman was removed from the case by the Judge. There is an ethical rule for lawyers that basically says: you don't file lawsuits against your own clients. Mr. Osman did. Mr. Osman also took steps to buy this surgery center out from under me. His reputation for putting the best interests of the community speaks for itself - but I will also add that I believe a doctor's practice should be controlled by doctors - not lawyers - and should be focused on the best care for the patients.

It is difficult for me to say this, but if this change of ownership is approved, I will not continue to provide services at this surgery center. I am committed to provide care to you, my patients, and want to continue to provide access to quality healthcare at the surgery center near your home and in your community. However, I do not trust Ronald Osman and I cannot operate in the surgery center where he is the owner and in charge.

If you agree that this Change of Ownership would harm access to healthcare in Marion and the surrounding communities more than it would benefit it, please join me in opposing this project. Your written comments, typed or handwritten, should be sent to our address in the enclosed return envelope.

Yours truly,

Dr. Maqbool Ahmad



Debbie Dullinger

206 E. Jefferson St.
Golconda, IL 62938

May 24, 2011

Dale Galassie, Chair
Illinois Health Facilities and
Services Review Board
525 West Jefferson St., 2nd Floor
Springfield, IL 62761-001

Re: Certificate of Exemption No. E-001-11
Surgery Center of Southern Illinois

Dear Mr. Galassie:

Please accept this as a letter of support in favor of granting the above referenced exemption application. I have known of Marion Surgery Center since sometime after it was opened in 1986 and was employed there from 1986 to 1992, at which time I resigned to pursue other interests.

During my time at the Surgery Center, I worked as a Scrub Nurse for Dr. Dennis Ryll and also Dr. Maqbool Ahmad. Ronald E. Osman was associated with Dr. Ryll until about 1988 or 1989, when Dr. Ryll's practice and the Surgery Center were sold by him to Medivison, Inc. During the time I worked at the Surgery Center, I witnessed Mr. Osman become and remain intimately involved in the day-to-day management and operations of the Surgery Center.

In 2009, my mother developed cataracts in both eyes, and I recommended that she see Dr. Ahmad for medical services. Dr. Ahmad accepted her as a patient, and sometime late in 2009 he removed cataracts from both her eyes, with both operations being performed at the Surgery Center. During those operations, the staff at the Surgery Center was extremely professional and took excellent care of my mother. Both she and I were pleased with the care provided by Dr. Ahmad and the Surgery Center staff.

I presently live in Golconda, Illinois, which is approximately 1 hour from Marion. One of my friends and neighbor, an 84 year old man, recently developed cataracts in both eyes. I recommended that he see Dr. Ahmad in his Marion, Illinois office, for medical care, and on April 28, 2011, I accompanied him to Dr. Ahmad's Marion, Illinois office for his appointment at 1:05 p.m. When we arrived, I told the intake clerk that I was confident my friend had cataracts, wanted Dr. Ahmad to examine him and perform surgery if cataracts



Dale Galassie, Chair
Illinois Health Facilities and
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were present. The clerk presented my friend and I with a packet of papers containing various instructions, notifications, directions and a one page letter addressed to "Dear Patients". A copy of that letter is enclosed. I read the letter and upon seeing that it stated that Dr. Ahmad did not trust Ronald Osman, I questioned the clerk about the letter. She told me that all Dr. Ahmad's patients were receiving a copy of the letter, made derogatory items about Mr. Osman, said that Mr. Osman was trying to steal the Surgery Center from Dr. Ahmad and reported that if Dr. Ahmad did not get the Surgery Center he would not do any more surgery in Marion. I told the clerk that I knew Mr. Osman well, that he was trustworthy and that I doubted what she said was correct.

I accompanied my friend through his examination with the technicians and later with Dr. Ahmad. Dr. Ahmad recognized me and asked how I was doing. I told him fine and asked about the letter. He told me that the situation been going on about 3 months and that Mr. Osman went behind his back and bought the Surgery Center. He also told me he had built a surgery center in Mt. Vernon, Illinois, and that was where he was currently doing all his surgeries. We then talked about both his sons becoming doctors.

Dr. Ahmad thereafter examined my friend and confirmed he had cataracts in both eyes. Dr. Ahmad told him he would be scheduled for cataract surgery sometime in May and that he would have to go to Mt. Vernon for his surgery. I asked why he could not have his surgery in Marion, and Dr. Ahmad said he would not do the surgery in Marion. I then stated that it was a long way from Golconda to Mt. Vernon (approximately 1¾ hours by car), and Dr. Ahmad told me that was not a problem because he had vans and would provide transportation.

I am certain that I do not know all the details about the sale of the Surgery Center, but I am certain that Mr. Osman has the managerial ability, financial ability, knowledge of medicine and other attributes necessary to own and operate the Surgery Center. In addition, I know Mr. Osman to have the highest integrity and be completely trustworthy. I myself retained Mr. Osman a few years ago to represent me as Executrix of my late husband's estate. Mr. Osman's services were of the highest quality. I do not have any reservations in recommending Mr. Osman receive this exemption.

Sincerely,



Debbie Dullinger