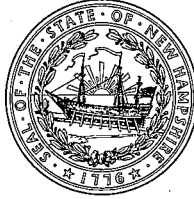


**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

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JOHN M. FORMELLA
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JAMES T. BOFFETTI
DEPUTY ATTORNEY GENERAL

October 27, 2025

Brooke Belanger
Chief Legal Officer
North Country Healthcare
Sent via email: brooksley.belanger@northcountryhealth.org

Re: New Hampshire Department of Justice's Review of North Country Healthcare

Dear Brooke,

Over the past year, North Country Healthcare ("NCH") has been the subject of several citizen complaints and media articles about board governance, availability of primary care providers, contracting decisions, layoffs, and executive compensation. Although NCH disputes the factual bases underlying these complaints and media articles and has provided the New Hampshire Department of Justice's Charitable Trusts Unit ("CTU") with information when requested, these complaints have persisted and created a level of distrust within the communities NCH serves. CTU believes that certain issues within our jurisdiction warrant further review. NCH has represented it will fully cooperate with CTU's review and, since meeting with CTU and a small group of NCH patients on October 1, 2025, have proactively started the development of public listening sessions to be conducted in each location of the affiliated hospitals.

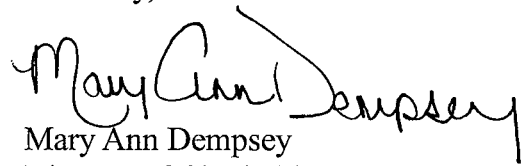
CTU's review is intended to resolve factual discrepancies in information provided to CTU regarding primary care recruitment and NCH executive compensation as well as to address CTU's independent concerns related to the NCH board's due diligence in contracting for revenue cycle services. CTU also retains concerns about certain board governance issues, including substantial turnover in the Weeks Medical Center board over the past two years alongside NCH's recent discussion with CTU of its intent to restructure its and its affiliated hospitals' board compositions in the future. We would strongly encourage NCH to pause any proposed changes to the NCH or affiliated hospital boards while CTU's review is pending.

To that end, our review will include investigation into at least the following: (1) the accuracy of information NCH and citizens have provided to CTU regarding NCH's notice to patients about a departing primary care physician and recruitment of primary care healthcare

providers; (2) NCH's compliance with the Affiliation Agreement and proposed changes to the composition of affiliated hospital boards; (3) NCH's contracting process for revenue cycle services and in particular claims that NCH fiduciaries had undisclosed conflicts of interest; (4) the substantial turnover on the Weeks Medical Center board; and (5) the NCH board's process in determining compensation for executive officers. While CTU will conduct its review in a confidential manner, CTU anticipates that it will issue a public report at the conclusion of its review.

CTU will send a series of written requests for information for NCH to complete. CTU also anticipates conducting interviews with individual boards as well as present and former board members. CTU's review is not intended to impede NCH's ongoing outreach plans with the community in any manner and NCH should continue those efforts. Finally, CTU recognizes the importance of conducting its review in a timely and thorough manner for both NCH and the community.

Sincerely,


Mary Ann Dempsey
Director of Charitable Trusts

Cc: John M. Formella, Attorney General
James T. Boffetti, Deputy Attorney General
Jared W. Davis, Assistant Director of Charitable Trusts
Alexandra Sosnowksi, Senior Assistant Attorney General