

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

LAVIE CARE CENTERS, LLC, et. al.,

Debtor.

Case No.: 24-55507-PMB

Chapter 11

Cases Jointly Administered

TO:

Wedgewood Operating, LLC
West Donegan AVE SNF OPCO, LLC
12170 Cortez Blvd Opco, LLC
1465 Oakfield Dr. OPCO, LLC
West Colonial Drive OPCO, LLC
Vista Manor Operating, LLC
Miami Road OPCO, LLC
Deltona Operating, LLC
Destin Senior Care, LLC
Santa Barbara Blvd OPCO, LLC
North Brentwood Circle OPCO, LLC
2826 Cleveland Avenue Operations, LLC
Palm Coast PKWY OPCO, LLC
Ginger Drive OPCO, LLC
Evans Avenue OPCO, LLC
3920 Rosewood Way OPCO, LLC
Hillcrest OPCO, LLC
541 Old Canoe Creek Rd OPCO, LLC
West Fletcher Ave OPCO, LLC
5405 Babcock St NE OPCO, LLC
6305 Cortez RD W OPCO, LLC
13th Road OPCO, LLC
NW 10th Place OPCO, LLC
702 S Kings Ave OPCO, LLC
710 N SUN DR OPCO, LLC
741 S Beneva RD OPCO, LLC
7950 Lake Underhill Road Operations, LLC



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Parks Operating, LLC
San Jose Blvd OPCO, LLC
Baya Nursing and Rehabilitation, LLC
Brandon Health OPCO, LLC
Floridian Facility Operations, LLC
Southpoint Drive East OPCO, LLC
Kissimmee OPCO, LLC
Melbourne OPCO, LLC
Franco SNF Operations, LLC
New Port Richey OPCO, LLC
Pondella Road OPCO, LLC
1215 Kingsley Ave OPCO, LLC
Pon Charlotte OPCO, LLC
West Altamonte OPCO, LLC

**RECOVERY CORP.’S NOTICE OF INTENT TO SERVE SUBPOENAS
FOR DOCUMENT PRODUCTION ON “FLORIDA SNF TRANSFEREES”**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 45, Federal Rule of Bankruptcy Procedure 9016, this Court’s local rules, and other applicable law, Healthcare Negligence Settlement Recovery Corp. (the “Recovery Corp.”), by and through its undersigned counsel, intends to serve a subpoena (the “Subpoena”) on each of the forty-one (41) above-referenced “Florida SNF Transferees.”

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45, each of the Florida SNF Transferees that receives a Subpoena is required to produce all documents responsive to the document requests (the “Document Requests”). Production of documents responsive to the Document Requests must be completed within fourteen (14) days of service of each Subpoena.

DATED this 17th day of September, 2024.

/s/ John A. Anthony

JOHN A. ANTHONY, ESQUIRE

Florida Bar Number: 0731013

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ANTHONY & PARTNERS, LLC

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Tampa, Florida 33602

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Attorneys for Recovery Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on September 17, 2024, by electronic means to:

La Vie Care Centers, LLC
c/o Ankura Consulting Group, LLC
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New York, New York 10017
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ben.jones@ankura.com
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Eighteenth and Arch Streets
Philadelphia, Pennsylvania 19103
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Counsel for the Official
Committee of Unsecured Creditors

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jonathan.s.adams@usdoj.gov
Counsel for the U.S. Trustee

/s/ John A. Anthony

ATTORNEY

EXHIBIT “A”

I. DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are to be used or referred to in connection with the production of documents pursuant to the Subpoena.

1. The term “Recovery Corp.” shall refer to Healthcare Negligence Settlement Recovery Corp., together with any past or present shareholders, officers, directors, employees, accountants, attorneys, or other agents of Recovery Corp.

2. The term “Florida Claims” shall refer to all causes of action, claims, and other rights that Recovery Corp. possesses against any Debtors, Litigation Targets, or others that are relevant to nursing home negligence of the Florida DivestCo Debtors, the Divested Florida SNFs, or the circumstances under which the Divested Florida SNFs were transferred to the Florida SNF Transferees, whether known or unknown, asserted or unasserted, meritorious or frivolous, disputed or undisputed, liquidated or unliquidated, fixed or contingent.

3. The term “Florida Claimants” shall refer to the Florida-based claimants who have assigned their Florida Claims to Recovery Corp., such claims having originally arisen based upon nursing home negligence at Divested Florida SNFs formerly owned by the various Florida DivestCo Debtors.

4. The term “Claimant Firms” shall refer to the seventeen (17) law firms representing the Florida Claimants nursing home negligence victims’ claims after their Florida Claims arose.

5. The term “Florida Lawsuits” shall refer to a set of lawsuits and related litigation activities commenced by the Claimant Firms on behalf of the Florida Claimants against the Florida DivestCo Debtors and others to recover on nursing home negligence grounds arising under Florida Statutes §400.001, et seq.

6. The term “Miami Action” shall refer to an action in the complex business division of the Circuit Court in and for Miami-Dade County, Florida (the “Miami Court”) to recover what are alleged to be avoidable transfers, and for other relief, styled Healthcare Negligence Settlement Recovery Corp. v. 5405 Babcock Street Operations, LLC, et al., Case No. 2024-007342-CA-01, initiated on April 22, 2024.

7. The term “Miami Defendants” shall refer to all defendants named in the Miami Action.

8. The term “Debtors” shall refer to the 282 chapter 11 debtors, together with any members, managing members, employees, accountants, attorneys, or other agents of the Debtors.

9. The term “Reorganizations” shall refer to the 282 chapter 11 reorganizations, jointly administered under Case No. 24-55507-PMB, In re LaVie

Care Centers, LLC, et al., before the United States Bankruptcy Court, Northern District of Georgia, Atlanta Division.

10. The term “Parent Debtor” shall refer to LaVie Care Centers, LLC, together with any members, managing members, employees, accountants, attorneys, or other agents of the Parent Debtor.

11. The term “OpCo Debtors” shall refer to a subset of 43 Debtors who have owned and/or operated one or more SNF since the Petition Dates.

12. The term “DivestCo Debtors” shall refer to a subset of Debtors who owned and/or operated one or more SNF prior to the Petition Dates, but transferred ownership or control of their business and/or assets such that they are presently de facto shell entities.

13. The term “Florida DivestCo Debtors” shall refer to a subset of DivestCo Debtors who owned and/or operated one or more SNF at the time that nursing home negligence claims arose under Florida Statutes §400.001, et seq. that gave rise to the Florida Lawsuits.

14. The term “Florida DivestCo Reorganizations” shall refer to a subset of the Reorganizations that correspond to the Florida DivestCo Debtors.

15. The term “Non-Debtor Related Entities” shall refer to the parent of the Parent Debtor, as well as all affiliates of the Parent Debtor, and all subsidiaries of those affiliates, including without limitation FC Investors XXI, LLC (“FC

Investors”), Pourlessions, LLC, d/b/a Synergy Healthcare Services, a/k/a Synergy Healthcare Services, Inc. (“Synergy”), NSPRMC, LLC, d/b/a NSPIRE Healthcare (“NSPIRE”) and Aspire Healthcare, LLC (“Aspire”), and all Florida SNF Transferees who are owned and/or controlled by any of the Non-Debtor Related Entities.

16. The term “SNFs” shall refer to skilled nursing facilities, to the extent previously or currently owned or operated by any of the Debtors.

17. The term “Divested Florida SNFs” shall refer to the subset of SNFs from which the Florida DivestCo Debtors were divested prior to the Petition Dates.

18. The term “Florida SNF Transferees” shall refer to any owner or operator of one or more SNF based in Florida who has owned and/or operated such SNF from or after the moment that one or more of the Florida DivestCo Debtors was divested of that SNF.

19. The term “Current Florida SNFs” shall refer to a potential subset of SNFs located in Florida and owned and/or operated by some of the OpCo Debtors as of the Petition Dates.

20. The term “Dias Defendants” shall refer to Dan Dias, Esquire and the law firm of Dias & Associates, together with any members, managing members, employees, accountants, attorneys, or other agents of the Dias Defendants.

21. The term “Florida Landlords” shall refer to every past or present landlord for any Florida SNF from January 1, 2021, through the Petition Dates, including without limitation the “Omega Parties” as defined in the DIP Finance Motion and the Bidding Procedures Motion.

22. The term “DIP Finance Motion” shall refer to “Debtors’ Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief” [Doc. 15].

23. The term “Bidding Procedures Motion” shall refer to “Debtors’ Motion for Entry of an Order (I) Approving Bidding Procedures and Bid Protections, (II) Scheduling Certain Dates and Deadlines with Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (V) Authorizing the Assumption and Assignment of Assumed Contracts, and (VI) Authorizing the Sale of Assets” [Doc. 104].

24. The term “Combined Plan” shall refer to “Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization” [Doc. 273], filed in the Reorganizations on July 23, 2024.

25. The term “Litigation Targets” shall refer to any of the Miami Defendants, any of the Florida Landlords, all the Florida SNF Transferees, Non-Debtor Related Entities, and any individual or entity intended to receive a release under relevant provisions of the DIP Finance Motion, Bidding Procedures Motion, or Combined Plan.

26. The term “Creditors Committee” shall refer to the June 13, 2024, appointment of the Official Committee of Unsecured Creditors in these Reorganizations by Office of the United States Trustee.

27. The term “Petition Dates” shall refer to the date the Petition was filed, that being June 2, 2024.

28. The term “Transfer Schedule” shall refer to the schedule attached hereto as Exhibit “A.”

29. The term “Florida Schedules” shall refer collectively to all information relating to the Florida DivestCo Debtors set forth in the Debtors’ schedules and statements of affairs filed in these Reorganizations.

30. The term “Conversion Motion” shall refer to the motion to dismiss or convert the Florida DivestCo Reorganizations filed by Recovery Corp. on or as of August 6, 2024, to which this discovery is tailored.

31. The term “communication” shall mean every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of

information whether orally or by document or whether face-to-face, by telephone, mail, personal delivery, or otherwise.

32. The term “control,” when applied to a business entity, shall mean the ownership, individually, singularly, or together with a spouse (as co-Obligors, as tenants by the entirety, or otherwise), or in conjunction with any person, partnership, corporation, or other business entity (to the extent also so controlled) of more than half of the authorized, issued, and outstanding shares of such business entity. This term shall also include a de facto control of such business entity, including exercise of day-to-day responsibility for business or financial affairs of such business entity.

33. The term “identify,”

- (a) when used in reference to any individual person, shall mean to state that individuals full name, present address, present employer, and occupation;
- (b) when used as reference to a person other than an individual, shall mean to state the legal nature of that person (e.g., a corporation, partnership, trust, estate, association, company), and to state its full name, address, and principal place of business; and

- (c) when used in reference to a document (or documents), shall mean to state the document's author, signatory, addressee, title, date, and page length.

34. The term "or" shall be construed by their conjunctively or disjunctively to bring within the scope of these requests any information which might otherwise be construed to be outside their scope.

35. The term "document" shall mean any and all information in tangible form, including without limitation, all letters, telegrams, telexes, teletypes, correspondence, e-mail transmissions and comparable computerized communications, contracts, drafts, agreements, notes to file, reports, memoranda, electrical or mechanical recordings or transcripts of such recordings, blueprints, flow sheets, calendar or diary entries, memoranda of telephone or personal conversations, memoranda or meetings or conferences, studies, reports, intra-office communications, manuals, newsletters, compilations, charts, graphs, compositions, bids, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates, promissory notes, evidence of indebtedness, and all drafts and copies of documents as herein defined, by whatever means made.

36. The term “related to” or any form thereof means to embody, record, refer to, concern, reflect, or in any manner involved or otherwise implicate the subject matter of the Subpoena.

37. To the extent that a term utilized herein is defined in the Bankruptcy Code, that definition will apply to the extent not inconsistent with the definitions specifically set forth herein.

38. Any defined term contained herein may be used, when applicable, in its possessive or plural form as reasonably applicable, as well as in masculine, feminine, or neuter form.

39. Unless otherwise specified, production is only sought from each such Florida SNF Transferee for the period from January 1, 2021, through present.

40. To simplify compliance with the Subpoena, this document is drafted to apply to each such Florida SNF Transferee with respect to its own business, financial, and legal affairs. Unless a fair and complete production includes the business, financial, and legal affairs of other Florida SNF Transferees, each such Florida SNF Transferee is understood to be responding for itself alone.

II. DOCUMENTS TO BE PRODUCED

Using the defined terms set forth above by Recovery Corp., each of the Florida SNF Transferees shall produce the following:

1. All organizational documents of each such Florida SNF Transferee, including articles, by-laws, meeting minutes, resolutions, and any documents showing the ultimate and intermediate owners and parents of each such Florida SNF Transferee.

2. Documents setting forth the officers, directors, and equity interest holders of each such Florida SNF Transferee from January 1, 2021, through present date.

3. All documents setting forth whether FC Investors, Synergy, Raydiant, NSPIRE, Aspire, or any subsidiary of any of them, does or previously has held any direct or indirect equity interest in each such Florida SNF Transferee.

4. All documents reflecting the involvement of Nathan Freund, CEO of Aspire, in the business, financial, legal, or other affairs of each such Florida SNF Transferee, and the extent to which Mr. Freund was responsible for transitioning any Divested Florida SNFs to each such Florida SNF Transferee.

5. All documents that constitute an organizational chart or other comparable depiction of where each such Florida SNF Transferee fits within a larger corporate conglomerate, including as applicable the relationship to the Debtors, FC Investors, Synergy, or their subsidiaries and affiliates.

6. All documents evidencing the role of the Dias Defendants as officers, directors, employees, consultants, advisors, or attorneys for each such Florida SNF Transferee.

7. All documents evidencing payments by each Florida SNF Transferee for management fees or other similar periodic payments to any subsidiary of Synergy in the ordinary course of its business.

8. All documents evidencing the receipt by any Florida SNF Transferee of an Employee Retention Tax Credit payment, or other similar emolument from the United States, as successor to a Florida DivestCo Debtor from which it acquired a Divested Florida SNF.

9. All documents setting forth the compiled or summarized financial results or position of each such Florida SNF Transferee at any time since January 1, 2021, including financial statements (including all schedules, management letters, or other communications), whether prepared/drafted professionally or in-house, and whether compiled, reviewed, or audited, it being noted that financial statements sought herein include monthly, quarterly, annual, and special purpose financial statements.

10. All documents setting forth the value of the going concern of each such Florida SNF Transferee at any point in time, or the Divested Florida SNF that it presently owns and operates.

11. All documents constituting federal income tax returns for each such Florida SNF Transferee for the years 2021 through the present, including all schedules, and any audit materials, correspondence, or other materials pertaining to the same.

12. All documents memorializing or documenting any transaction pursuant to which each such Florida SNF Transferee acquired ownership of a Divested Florida SNF from one of the Florida DivestCo Debtors.

13. All documents showing the extent to which each such Florida SNF Transferee was aware of the existence of any applicable Florida Claims pertaining to its Divested Florida SNF in connection with the acquisition of ownership or control of the same from the corresponding Florida DivestCo Debtor at the time that the transfer occurred.

14. All CHOW or CHOP documentation submitted to AHCA in connection with any transaction pursuant to which each such Florida SNF Transferee acquired ownership of a Divested Florida SNF from one of the Florida DivestCo Debtors, and any notifications to any claimants at the time that such application was submitted, including without limitation statutory notifications to any of the Florida Claimants, Claimant Firms, and any other parties involved in the Florida Lawsuits.

15. All documents setting forth consideration received by any Florida DivestCo Debtor, or any parent or other “insider” of the said Florida DivestCo

Debtor, as defined in Bankruptcy Code §101(31), in connection with any transaction pursuant to which that Florida SNF Transferee acquired ownership of a Divested Florida SNF from one of the Florida DivestCo Debtors.

16. All leases and other documents setting forth lease terms and related business and financial terms of any tenancy with a Florida Landlord for a Divested Florida SNF acquired by each such Florida SNF Transferee in connection with a transaction in which ownership was acquired from one of the Florida DivestCo Debtors.

17. All documents effectuating, memorializing, or otherwise documenting the assumption by each such Florida SNF Transferee of any form of liability of the corresponding Florida DivestCo Debtor in connection with the transfer of a Divested Florida SNF from that Florida DivestCo Debtor to that Florida SNF Transferee, including lease obligations, supplier obligations, employee leasing obligations, tax obligations, and any other trade debt or obligation of any kind.

18. All documents showing any change in business operations of a Divested Florida SNF following transfer from a Florida DivestCo Debtor to each such corresponding Florida SNF Transferee.

19. All documents showing any interruption in the continuity of business operations of a Divested Florida SNF following transfer from a Florida DivestCo Debtor to each such corresponding Florida SNF Transferee.

20. All documents evidencing income received by each such Florida SNF Transferee from federal programs using the account numbers, bank accounts, or other payment channels established by a Florida DivestCo Debtor before any transaction pursuant to which each such Florida SNF Transferee acquired ownership of a Divested Florida SNF from one of the Florida DivestCo Debtors.

21. All documents establishing any awareness on the part of each such Florida SNF Transferee of the existence of the Miami Action and the claims asserted therein.

22. All documents setting forth any form of right of reimbursement, contribution, indemnity, recoupment, or other right that each such Florida SNF Transferee has or claims against any of the Litigation Targets in connection with any real or imagined claim that may be asserted by a creditor of a Florida DivestCo Debtor, or on behalf of its bankruptcy estate, based upon the transfer of a Divested Florida SNF owned by that Florida DivestCo Debtor that was ultimately transferred to that Florida SNF Transferee.

23. All communications between any representative of each such Florida SNF Transferee and any representative of any of the Debtors regarding the claims asserted by Recovery Corp., the releases sought in the DIP Finance Motion, the releases sought in the Bidding Procedures Motion, and/or the release sought in the Combined Plan.

24. All communications between any representative of each such Florida SNF Transferee and any representative of any of the Debtors regarding the Debtors' objectives in these Reorganizations, including without limitation any lawyer affiliated with the Dias Defendants or McDermott Will & Emery LLP.

25. All documents that materially confirm or rebut the truth and accuracy of the Transfer Schedule.

Exhibit “A”

SNF Transferees and Parent LLCs

Debtor Name	Street Address	Provider Profile	New Owner/Licensee (Transferee)	New Owner/Licensee (Transferee) Officer	Parent LLC Name	Parent LLC Officer
1010 Carpenters Way Operations, LLC	1010 Carpenters Way Lakeland, FL 33809	Bedrock Rehabilitation and Nursing Center at Wedgewood	Wedgewood Operating LLC	Jacob Zahler	Wedgewood Holdo LLC	Jacob Zahler
1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	Aspire at Kissimmee Gardens	West Donegan AVE SNF OPCO LLC	Nathan Freund	West Donegan SNF Parent LLC	Nathan Freund
11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	Harts Harbor Health Care Center	11565 Harts Road Operations, LLC	Jared Elliott	Epsilon Healthcare Properties, LLC	Craig Robinson
12170 Cortez Boulevard Operations, LLC	12170 Cortez Blvd Brooksville, FL 34613	Aspire at Spring Hill	12170 Cortez Blvd Opco LLC	Nathan Freund	12170 Cortez Blvd OPCO Parent LLC	Nathan Freund
1465 Oakfield Drive Operations, LLC	1465 Oakfield Dr Brandon, FL 33511	Aspire at Oakfield	1465 Oakfield Dr OPCO LLC	Nathan Freund	1465 Oakfield Dr OPCO Parent LLC	Nathan Freund
15204 West Colonial Drive Operations, LLC	15204 W Colonial Dr Winter Garden, FL 34787	Aspire at Colonial Lakes	West Colonial Drive OPCO LLC	Nathan Freund	West Colonial Parent LLC	Nathan Freund
1550 Jess Parrish Court Operations, LLC	1550 Jess Parrish Ct Titusville, FL 32796	Bedrock Rehabilitation and Nursing Center at Vista Manor	Vista Manor Operating LLC	Jacob Zahler	Vista Manor HOLDCO LLC	Jacob Zahler
1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Aspire at the Sea - Harbor Beach	Miami Road OPCO LLC	Nathan Freund	Miami Road Parent LLC	Nathan Freund
1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Bedrock Rehabilitation and Nursing Center at West Volusia	Deltona Operating LLC	Jacob Zahler	Deltona HOLDCO LLC	Jacob Zahler
195 Mattie M. Kelly Boulevard Operations, LLC	195 Mattie M Kelly Blvd Destin, FL 32541	Destination Health and Rehabilitation Center	Destin Senior Care, LLC	Destin Senior Investments II, LLC	Destin Senior Investments I & II, LLC; Okaloosa Senior Investments, LLC; Coastal Care Properties, LLC	Duane Gallagher, Geoffrey Fraser, Jeffrey Cleveland, Randall Mcelheney
216 Santa Barbara Boulevard Operations, LLC	216 Santa Barbara Blvd Cape Coral, FL 33991	Aspire at Santa Barbara	Santa Barbara Blvd OPCO LLC	Nathan Freund	Santa Barbara Parent LLC	Nathan Freund
2333 North Brentwood Circle Operations, LLC	2333 N. Brentwood Cir Lecanto FL 34461	Aspire at Brentwood	North Brentwood Circle OPCO LLC	Nathan Freund	Brentwood Parent LLC	Nathan Freund
2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	Heritage Park Rehabilitation and Healthcare	2826 Cleveland Avenue Operations, LLC	Multiple Listed	Epsilon Healthcare Properties, LLC	Christopher Bryson; Daniel E Dias; Gregory L Hayes; Kenneth Ussery
3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Aspire at Grand Oaks	Palm Coast PKWY OPCO LLC	Nathan Freund	Palm Coast Parent LLC	Nathan Freund
3101 Ginger Drive Operations, LLC	3101 Ginger Dr Tallahassee, FL 32308	Aspire at Tallahassee	Ginger Drive OPCO LLC	Nathan Freund	Ginger Parent LLC	Nathan Freund
3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Aspire at Evans	Evans Avenue OPCO LLC	Nathan Freund	Evans Parent LLC	Nathan Freund
3920 Rosewood Way Operations, LLC	3920 Rosewood Way Orlando, FL 32808	Aspire at Rosewood	3920 Rosewood Way OPCO LLC	Nathan Freund	3920 Rosewood Way OPCO Parent LLC	Nathan Freund
4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Emerald Nursing and Rehabilitation Center	Hillcrest OPCO LLC	Jacob Bengio, CFO/Jeremie Paritzky, CEO	Hillcrest OPCO Holdings LLC	Jacob Bengio, CFO/Jeremie Paritzky, CEO
4641 Old Canoe Creek Road Operations, LLC	4641 Old Canoe Creek Road Sanit Cloud, FL 34769	Aspire at St. Cloud	541 Old Canoe Creek Rd OPCO LLC	Nathan Freund	541 Old Canoe Creek Rd OPCO Parent LLC	Nathan Freund
518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	Aspire at Fletcher	West Fletcher Ave OPCO LLC	Nathan Freund	West Fletcher Parent LLC	Nathan Freund
5405 Babcock Street Operations, LLC	5405 Babcock St NE Palm Bay, FL 32905	Aspire at Palm Bay	5405 Babcock St NE OPCO LLC	Nathan Freund	5405 Babcock St NE OPCO Parent LLC	Nathan Freund
6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	Aspire at Palma Sola Bay	6305 Cortez RD W OPCO LLC	Nathan Freund	6305 Cortez Rd W OPCO Parent LLC	Nathan Freund
6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	Aspire at Greenacres	13th Road OPCO LLC	Nathan Freund	13th Road Parent LLC	Nathan Freund
6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	Aspire at North Florida	NW 10th Place OPCO LLC	Nathan Freund	NW 10th Parent LLC	Nathan Freund
702 South Kings Avenue Operations, LLC	702 S Kings Ave Brandon, FL 33511	Aspire at Central Park	702 S Kings OPCO LLC (not in Sunbiz)	Nathan Freund	702 S Kings Ave OPCO Parent LLC	Nathan Freund
710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	Aspire at Lake Mary	710 N SUN DR OPCO LLC	Nathan Freund	710 N Sun Dr OPCO Parent LLC	Nathan Freund
741 South Beneva Road Operations, LLC	741 South Beneva Road Sarasota, FL 34232	Aspire at Beneva	741 S Beneva RD OPCO LLC	Nathan Freund	741 S Beneva Rd OPCO Parent LLC	Nathan Freund
777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102	NOT LISTED				
7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	Rio Pinar Health Care	7950 Lake Underhill Road Operations, LLC	Multiple Listed		
9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Bedrock Rehabilitation and Nursing Center at Orlando South	Parks Operating LLC	Jacob Zahler	Parks HOLDCO LLC	Jacob Zahler
9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	Aspire at San Jose	San Jose Blvd OPCO LLC	Nathan Freund	San Jose Parent LLC	Nathan Freund
Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation Center	Baya Nursing and Rehabilitation, LLC	Jared Elliott	Consulate MZHBS Leaseholdings LLC	Craig Robinson
Brandon Facility Operations, LLC	701 Victoria St Brandon, FL 33510	Victoria Crossing Rehabilitation Center	Brandon Health OPCO LLC	Markowitz Yossy		
Floridean Facility Operations, LLC	47 NW 32nd PL Miami, FL 33125	The Floridean Nursing and Rehabilitation Center	Floridian Facility Operations LLC	Miriam Pastor		
Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Aspire at Jacksonville	Southpoint Drive East OPCO LLC	Nathan Freund	Southpoint Parent LLC	Nathan Freund
Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee Nursing & Rehabilitation Center	Kissimmee OPCO LLC	TOK LTC Holdings LLC	Kissimmee Member LLC	Joel, Leifer; Joel Zupnick; FLNO Capital Group LLC
Melbourne Facility Operations, LLC	3033 Sarno Rd Melbourne, FL 32934	Nursing & Rehabilitation Center of Melbourne	Melbourne OPCO LLC	LLC Melbourne Member	Melbourne Member LLC	Joel, Leifer; Joel Zupnick; FLNO Capital Group LLC
Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Azure Shores Rehab	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	Franco SNF Operations Holdings LLC	The Sunshine SNF Gropu LLC
New Port Richey Facility Operations, LLC	8417 Old County Rd 54 New Port Richey, FL 34653	Nursing & Rehabilitation Center of New Port Richey	New Port Richey OPCO LLC	LLC New Port Richey Member	New Port Richey Member LLC	Joel, Leifer; Joel Zupnick; FLNO Capital Group LLC
North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Aspire at North Fort Myers	Pondella Road OPCO LLC	Nathan Freund	Pondella Parent LLC	Nathan Freund
Orange Park Facility Operations, LLC	1215 Kingsley Ave Orange Park, FL 32073	Aspire at Orange Park	1215 Kingsley Ave OPCO LLC	Nathan Freund	1215 Kingsley Ave OPCO Parent LLC	Nathan Freund
Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte Center For Nursing & Rehabilitation	Port Charlotte OPCO LLC	LLC Port Charlotte Member	Port Charlotte Member, LLC	Yossy Markowitz
West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte Nursing & Rehabilitation Center	West Altamonte OPCO LLC	LLC West Altamonte Member	West Altamonte Member LLC	Joel, Leifer; Joel Zupnick; FLNO Capital Group LLC