



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor
MANDY COHEN, MD, MPH • Secretary
MARK PAYNE • Director, Division of Health Service Regulation

July 3, 2019

Lanchi Bombalier
Arnall Golden Gregory LLP
171 17th Street NW, Suite 2100
Atlanta GA 30363-1031

No Review

Record #: 2981
Facility Name: See Attachment A
FID #: See Attachment A
Business Name: NC Pace RE, LLC
Business #: 2280
Project Description: Change in indirect ownership of RHA Facilities Statewide
County: See Attachment A

Dear Ms. Bombalier:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the above referenced proposal. Based on the CON law **in effect on the date of this response to your request**, the proposal described in that correspondence is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

You may need to contact the Agency's Mental Health Licensure and Certification Section to determine if they have any requirements for development of the proposed project.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office.

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Celia C. Inman
Project Analyst

Martha J. Frisone
Chief

cc: Mental Health Licensure and Certification Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION

HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704
www.ncdhhs.gov/dhsr • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

**Exemption Record #1717, Attachment A
New Owner - NC Pace RE, LLC**

Facility Name	FID	County	Street Address	City	Zip
23rd Street Home	921396	Catawba	804 East 23rd Street	Newton	28658
Ashley Heights Home	921463	Hoke	2990 Reservation Road	Aberdeen	28315
Bear Creek	922017	Lenoir	5840 Greenwood Avenue	La Grange	28551
Bonnie Lane Group Home	921515	Iredell	121 Bonnie Lane	Statesville	28625
Boxwood Acres	921518	Davie	3464 US Highway 601 South	Mocksville	27028
Brookwood	120593	Cabarrus	207 Summerpine Place	Kannapolis	28081
Burtonwood Circle Home	925192	Mecklenburg	1710 Burtonwood Circle	Charlotte	28212
Canterbury Road Home	921586	Johnston	214 Canterbury Road	Smithfield	27577
Chandler Road	921633	Durham	342 Chandler Road	Durham	27707
Clear Creek	922019	Mecklenburg	11950 Howell Center Drive	Charlotte	28227
College Park	921672	Scotland	1900 Lake Drive	Laurinburg	28352
Country Cove Group Home	921704	Henderson	28 Hillpark Drive	Hendersonville	28739
Country Manor Group Home	921706	Johnston	1070 Packing Plant Road	Smithfield	27577
Curry House	080818	Pitt	1793 Briley Road	Greenville	27834
Dal-Wan Heights Group Home	921730	Iredell	748 Sharon Dr.	Statesville	28625
Dove Road Home	921774	Granville	102 Dove Road	Creedmoor	27522
Eastbrook	921792	Robeson	110 Eastbrook Drive	Red Springs	28377
Emory Road Asheville	080688	Buncombe	20 Emory Road	Asheville	28806
Erwin #2 Group Home	921813	Harnett	202 West B Street	Erwin	28339
Erwin Avenue Home	921814	Harnett	100 Erwin Avenue	Erwin	28339
Fanjoy Home #1	921835	Iredell	235 Fanjoy Road	Statesville	28625
Fanjoy Home #2	921836	Iredell	450 Twin Oaks Road	Statesville	28625
Forest Bend Group Home	921875	Transylvania	1 South Oak Street	Brevard	28712
Forest Hills Group Home	956225	Pitt	1913 Forest Hills Drive	Greenville	27834
Forsyth Group Home #1	921878	Forsyth	216 Linville Springs Road	Kernersville	27284
Forsyth Group Home #2	921880	Forsyth	8460 Belews Creek Road	Belews Creek	27009
Fox Run Group Home	091034	Lenoir	3845 Robin's Nest Road	LaGrange	28551
Gatewood	922016	Guilford	1508 Gatewood Avenue	Greensboro	27405
Granville ICF/MR Group Home	922508	Granville	5509 Dorsey Road	Oxford	27565
Guilford #1	921934	Guilford	416 Boxwood Drive	Greensboro	27410
Guilford #2	921935	Guilford	1800 Strathmore Drive	Greensboro	27410
Guilford #3	951936	Guilford	2600 Pleasant Ridge Road	Summerfield	27409
Guilford IV	080755	Guilford	404 Skeet Club Road	High Point	27265
Heath Avenue Home	921962	Johnston	105 East Heath Avenue	Smithfield	27577
Hoffman Group Home	921984	Richmond	104 Teal Street	Hoffman	28347
Holden Group Home	944936	Guilford	517 North Holden Road	Greensboro	27410
Hollingswood Group Home	921990	Iredell	214 Hollingswood Drive	Statesville	28625
Holloway Street Home	080667	Durham	4795 Stanley Road	Durham	27703
Hope Mills Home	944881	Cumberland	5713 Newton Street	Hope Mills	28348
King George Group Home	956230	Pitt	323 King George Rd	Greenville	27834
Lakeview	925332	Mecklenburg	5927 Lakeview Drive	Charlotte	28270
Lakewood	922099	Wilkes	554 Ridge Lane	Wilkesboro	28697
Laura Springs Road Home	922107	Rowan	309 Laura Springs Drive	Salisbury	28144
Lee Forest Home	922117	Scotland	1209 Pellham Drive	Laurinburg	28352
Lewis Fork Homes I & II	922126	Wilkes	1388 Lewis Fork Baptist Church Rd.	Ferguson	28624
Lillington Group Home	922139	Harnett	1110 NC 210 South	Lillington	27546
Linoak Group Home	922147	Lincoln	3175 Bank St.	Lincolnton	28092
Lynn Road	922165	Durham	515 Lynn Road	Durham	27707
Magnolia Group Home	922167	Moore	928 Magnolia Drive	Aberdeen	28315

Exemption Record #1717, Attachment A

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New Owner - NC Pace RE, LLC

Facility Name	FID	County	Street Address	City	Zip
Mineral Springs I	922230	Durham	414 Mineral Springs Road	Durham	27703
Mineral Springs II	922231	Durham	410 Mineral Springs Road	Durham	27703
Monroe Road	924981	Mecklenburg	7621 Monroe Road	Charlotte	28202
Myron Place	922261	Rowan	219 Myron Place	Salisbury	28144
Oakdale Group Home	922324	Iredell	436 Mocksville Highway	Statesville	28625
Old Farm Road	922329	Hoke	409 Old Farm Road	Raeford	28376
Park Avenue Home	922350	Granville	105 Park Avenue	Creedmoor	27522
Penny Lane #1	922373	Catawba	2840 Hwy 70 East	Claremont	28610
Penny Lane II	922374	Catawba	2830 Highway 70 East	Claremont	28610
Pinebrook Group Home - Hend	922389	Henderson	301 Erkwood Drive	Hendersonville	28791
Pinewood Group Home - States	944283	Iredell	2101 Beauty Street	Statesville	28625
Pleasant Acres	922407	Davie	447 Pleasant Acres Drive	Mocksville	27028
Rayside A	955392	Henderson	617 Ray Street	Hendersonville	28792
Rayside B	955391	Henderson	619 Ray Street	Hendersonville	28792
Ridgecrest I	922468	Ashe	310 Locust Street	West Jefferson	28694
Ridgecrest II	922469	Ashe	421 Ridgecrest Avenue	West Jefferson	28694
Ridgely Oak	922011	Guilford	1307 Westridge Road	Greensboro	27410
Riverbend	942020	Craven	140 Pirates Road	New Bern	28562
Riverview Home	922475	Lincoln	1793 Riverview Road	Lincolnton	28092
Robins Nest Group Home	091035	Lenoir	3921 Robin's Nest Road	LaGrange	28551
Rockwell I & 2	922499	Rowan	Highway 152 East 6330	Rockwell	28138
Rollingwood	922015	Guilford	4206 West Friendly Avenue	Greensboro	27410
Scotland Forest Home	922543	Scotland	21760 Andrew J. Hwy	Maxton	28364
Scotthurst I & II	922547	Forsyth	174 Scotthurst Drive	Winston Salem	27107
Shannonbrook Home	922564	Catawba	914 West First Street	Newton	28658
Shelburne Place	971037	Mecklenburg	2524 Shelburne Place	Charlotte	28227
Sherwood Park Home	922570	Moore	126 Robinhood Lane	Aberdeen	28315
Smith Street Home	922601	Rowan	112 Smith Street	Cleveland	27013
Southern Avenue Home	944882	Cumberland	2001 Southern Avenue	Fayetteville	28301
Stem Road Home	922652	Granville	702 Stem Road	Creedmoor	27522
Stoneridge	944370	Rowan	222 Union Heights Boulevard	Salisbury	28144
Strickland Bridge Homes A & B	944894	Cumberland	1818 Strickland Bridge Rd.	Fayetteville	28304
Sunny Hill Group Home #1	952674	Lincoln	261 Sunny Hill Drive	Lincolnton	28092
Sunny Hill II	922673	Lincoln	279 Sunny Hill Drive	Lincolnton	28092
Tar River	922010	Pitt	498 & 500 Sean Drive	Greenville	27834
Thomas Street Home	922750	Ashe	348 Thomas St.	Jefferson	28640
Twinbrooks	952779	Davie	189 Fairmont Lane	Mocksville	27028
Wakulla I & II	922824	Robeson	5792 & 5812 NC Hwy 71 North	Maxton	28364
Walnut Creek	922018	Wayne	5709 US 70 East	Goldsboro	27534
Wendover Home	922856	Catawba	631 Old Park Road	Maiden	28650
West Friendly	922012	Guilford	4011 West Friendly Avenue	Greensboro	27410
Westminister	922013	Guilford	1111 Westridge Road	Greensboro	27410
Westridge	922014	Guilford	1609 Westridge Road	Greensboro	27410
Wildcat Group Home	922879	Watauga	208 Wildcat Rd.	Deep Gap	28618
Wilmington Road Group Home	944891	Cumberland	800 Wilmington Road	Fayetteville	28304
Yadkin I	922913	Yadkin	3716 Westwood Drive	Hamptonville	27020
Yadkin II & III	922912	Yadkin	3220 & 3224 US Highway 21	Hamptonville	27020



June 28, 2019

VIA FEDERAL EXPRESS

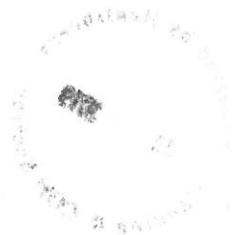
Ms. Martha Frisone
Chief, Healthcare Planning and Certificate of Need
2704 Mail Service Center
Raleigh, NC 27699-2704

**Re: Request for No Review: North Carolina Intermediate Care Facilities /
Changes in Indirect Ownership Interest**

Dear Ms. Frisone:

The purpose of this letter is to request confirmation of no review for a transaction involving a proposed change in indirect ownership of the real estate owner and the licensed operator for the Intermediate Care Facilities ("ICFs") listed in Attachment A (the "Transaction"). There will be no change to NC Pace RE, LLC as the real estate owner and Certificate of Need ("CON") holder, and RHA Health Services NC, LLC will remain the licensed operator of the ICFs through a sublease arrangement with RHA Health Services, LLC, which in turn has leased the ICFs from NC Pace RE, LLC pursuant to a master lease arrangement. Other than changes resulting in the ordinary course of business, there is no intention to change the services provided by the Facilities or their services areas, and none of the ICFs' day-to-day operations should be impacted.

We have enclosed before and after diagrams at Attachment B to show relationships and the level of ownership at which the Transaction is occurring as well as the lease structure that is currently in place and will remain unchanged following the Transaction. The lease structure consists of the Master Lease and Security agreement dated October 20, 2015 by and among NC Pace RE, LLC, RHA Health Services, LLC, and other parties thereto, and a Sublease dated October 30, 2015 by and between RHA Health Services, LLC and RHA Health Services NC, LLC. This lease and sublease were implemented pursuant to the acquisition described in the letter provided to your office dated September 3, 2015 and approved by your office in an exemption dated September 9, 2015. The lease and sublease arrangement is currently in effect and will continue following the Transaction.



We understand that these changes do not require CON approval. We also understand that non-ICF facilities are not subject to CON requirements and, thus, a change in indirect ownership interests of the Operator for non-ICF facilities due to the Transaction also does not require CON approval.

We request that your office provide a letter based on the facts set forth herein confirming our understanding as outlined above (i.e., a "No Review" letter). We will notify your office after the Transaction occurs.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

ARNALL GOLDEN GREGORY LLP

Lanchi Bombalier 

Lanchi N. Bombalier, Esq.

ATTACHMENT A

ATTACHMENT A / ICF Facility List

Facility Name/Address	Licensed Operator	Real Estate Owner
23RD STREET HOME 804 East 23 rd Street Newton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ASHLEY HEIGHTS HOME 2990 Reservation Road Aberdeen, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
BEAR CREEK ICF 5840 Greenwood Avenue La Grange, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
BONNIE LANE GROUP HOME 121 Bonne Lane Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
BOXWOOD ACRES 3464 US Highway 601 South Mocksville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
BROOKWOOD HOME 1254 Brookhaven Drive Lincolnton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
BURTONWOOD CIRCLE HOME 1710 Burtonwood Circle Charlotte, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
CANTERBURY ROAD HOME 214 Canterbury Road Smithfield, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
CHANDLER ROAD 342 Chandler Road Durham, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
CLEAR CREEK 11950 Howell Center Drive Charlotte, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
COLLEGE PARK 1900 Lake Drive Laurinburg, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
COUNTRY COVE GROUP HOME 28 Hillpark Drive Hendersonville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
COUNTRY MANOR GROUP HOME 1070 Packing Plant Road Smithfield, NC	RHA Health Services NC, LLC	NC Pace RE, LLC

Facility Name/Address	Licensed Operator	Real Estate Owner
CURRY HOUSE 1793 Briley Road Greenville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
DAL-WAN HEIGHTS GROUP HOME 748 Sharon Drive Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
DOVE ROAD HOME 102 Dove Road Creedmoor, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
EASTBROOK 110 Eastbrook Drive Red Springs, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
EMORY ROAD HOME 20 Emory Road Asheville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ERWIN #2 GROUP HOME 202 West B Street Erwin, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ERWIN AVENUE HOME 100 Erwin Avenue Erwin, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FANJOY HOME #1 235 Fanjoy Road Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FANJOY HOME #2 450 Twin Oaks Road Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FOREST BEND GROUP HOME 47 S Oak Street Brevard, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FOREST HILLS GROUP HOME 1913 Forest Hills Drive Greenville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FORSYTH GROUP HOME #1 216 Linville Springs Road Kernersville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FORSYTH GROUP HOME #2 8460 Belews Creek Road Belews Creek, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
FOX RUN GROUP HOME 3845 Robin's Nest Road LaGrange, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
GATEWOOD	RHA Health Services NC, LLC	NC Pace RE, LLC

Facility Name/Address	Licensed Operator	Real Estate Owner
1508 Gatewood Avenue Greensboro, NC		
GRANVILLE ICF/MR GROUP HOME 5509 Dorsey Road Oxford, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
GUILFORD #1 416 Boxwood Drive Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
GUILFORD #2 1800 Strathmore Drive Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
GUILFORD #3 2600 Pleasant Ridge Road Summerfield, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
GUILFORD IV 404 Skeet Club Road High Point, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HEATH AVENUE HOME 105 East Heath Avenue Smithfield, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HOFFMAN GROUP HOME 104 Teal Street Hoffman, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HOLDEN GROUP HOME 517 North Holden Road Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HOLLINGSWOOD GROUP HOME 214 Hollingswood Drive Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HOLLOWAY STREET HOME 4795 Stanley Road Durham, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
HOPE MILLS HOME 5713 Newton Street Hope Mills, NC	RHA Health Services NC, LLC	Unrelated third-party owner
KING GEORGE GROUP HOME 323 King George Road Greenville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LAKEVIEW 5927 Lakeview Drive Charlotte, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LAKWOOD 554 Ridge Lane	RHA Health Services NC, LLC	NC Pace RE, LLC

Facility Name/Address	Licensed Operator	Real Estate Owner
Wilkesboro, NC		
LAURA SPRINGS ROAD HOME 309 Laura Springs Drive Salisbury, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LEE FOREST HOME 1209 Pellham Drive Laurinburg, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LEWIS FORK HOMES I & II 1388 Lewis Fork Baptist Church Road Ferguson, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LILLINGTON GROUP HOME 1110 NC 210 South Lillington, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LINOAK GROUP HOME 3175 Bank Street Lincolnton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
LYNN ROAD 515 Lynn Road Durham, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
MAGNOLIA GROUP HOME 928 Magnolia Drive Aberdeen, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
MINERAL SPRINGS I 414 Mineral Springs Road Durham, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
MINERAL SPRINGS II 410 Mineral Springs Road Durham, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
MONROE ROAD 7621 Monroe Road Charlotte, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
MYRON PLACE 219 Myron Place Salisbury, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
OAKDALE GROUP HOME 436 Mocksville Highway Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
OLD FARM ROAD 409 Old Farm Road Raeford, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
PARK AVENUE HOME 105 Park Avenue Creedmoor, NC	RHA Health Services NC, LLC	NC Pace RE, LLC

Facility Name/Address	Licensed Operator	Real Estate Owner
PENNY LANE #1 2840 Hwy 70 East Claremont, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
PENNY LANE II 2830 Highway 70 East Claremont, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
PINEBROOK GROUP HOME 301 Erkwood Drive Hendersonville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
PINEWOOD GROUP HOME 2101 Beauty Street Statesville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
PLEASANT ACRES 447 Pleasant Acres Drive Mocksville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RAYSIDE A 617 Ray Avenue Henderson, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RAYSIDE B 619 Ray Avenue Hendersonville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RIDGECREST I 310 Locust Street West Jefferson, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RIDGECREST II 421 Ridgecrest Avenue West Jefferson, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RIDGELY OAK 1307 Westridge Road Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RIVERBEND 140 Pirates Road New Bern, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
RIVERVIEW HOME 1793 Riverview Road Lincolnton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ROBIN'S NEST GROUP HOME 3921 Robin's Nest Road LaGrange, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ROCKWELL 1 & 2 6330 Highway 152 East Rockwell, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
ROLLINGWOOD	RHA Health Services NC, LLC	NC Pace RE, LLC

Facility Name/Address	Licensed Operator	Real Estate Owner
4206 West Friendly Avenue Greensboro, NC		
SCOTLAND FOREST HOME 21760 Andrew J. Hwy. Maxton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SCOTTHURST I & II 174 Scotthurst Drive Winston Salem, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SHANNONBROOK HOME 914 West First Street Newton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SHELburnE PLACE 2524 Shelburne Place Charlotte, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SHERWOOD PARK HOME 126 Robinhood Lane Aberdeen, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SMITH STREET HOME 112 Smith Street Cleveland, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SOUTHERN AVENUE HOME 2001 Southern Avenue Fayetteville, NC	RHA Health Services NC, LLC	Unrelated third-party owner
STEM ROAD HOME 702 Stem Road Creedmoor, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
STONERIDGE 222 Union Heights Boulevard Salisbury, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
STRICKLAND BRIDGE HOMES A & B 1818 Strickland Bridge Road Fayetteville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SUNNY HILL GROUP HOME #1 261 Sunny Hill Drive Lincolnton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
SUNNY HILL II 279 Sunny Hill Drive Lincolnton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
TAR RIVER 498 & 500 Sean Drive Greenville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
THOMAS STREET HOME 348 Thomas Street	RHA Health Services NC, LLC	NC Pace RE, LLC

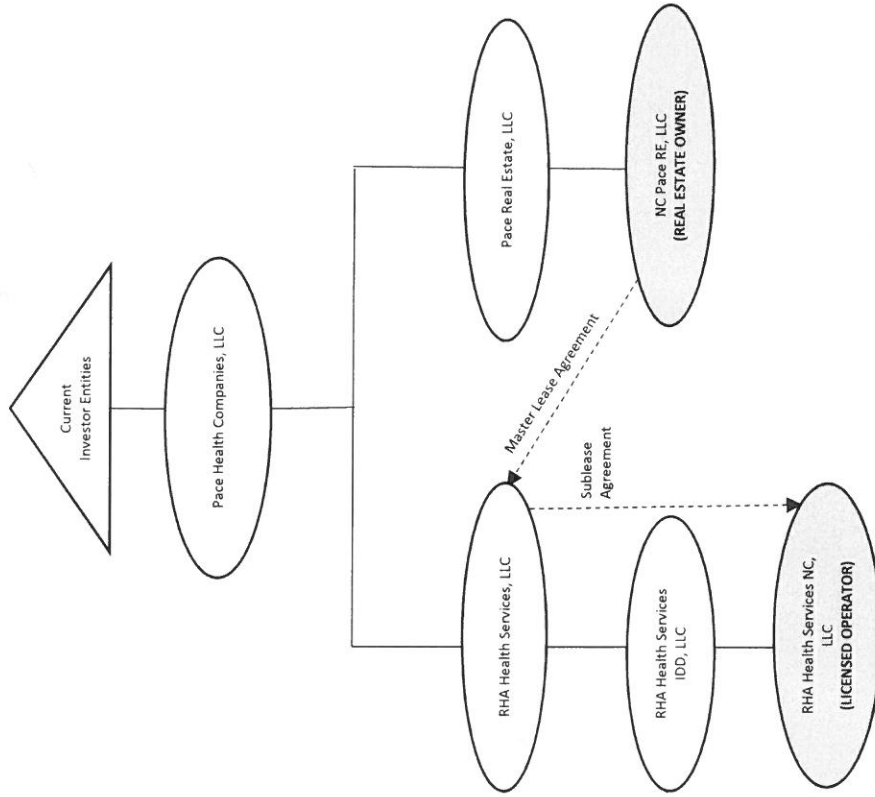
Facility Name/Address	Licensed Operator	Real Estate Owner
Jefferson, NC		
TWINBROOKS 189 Fairmont Lane Mocksville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WAKULLA I & II 5792 & 5812 NC HWY 71 North Maxton, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WALNUT CREEK 5709 US 70 East Goldsboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WENDOVER HOME 631 Old Park Road Maiden, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WEST FRIENDLY 4011 West Friendly Avenue Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WESTMINISTER 1111 Westridge Road Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WESTRIDGE 1609 Westridge Road Greensboro, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WILDCAT GROUP HOME 208 Wildcat Road Deep Gap, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
WILMINGTON ROAD GROUP HOME 800 Wilmington Road Fayetteville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
YADKIN I 3716 Westwood Drive Hamptonville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC
YADKIN II & III 3220 & 3224 us Highway 21 Hamptonville, NC	RHA Health Services NC, LLC	NC Pace RE, LLC

ATTACHMENT B

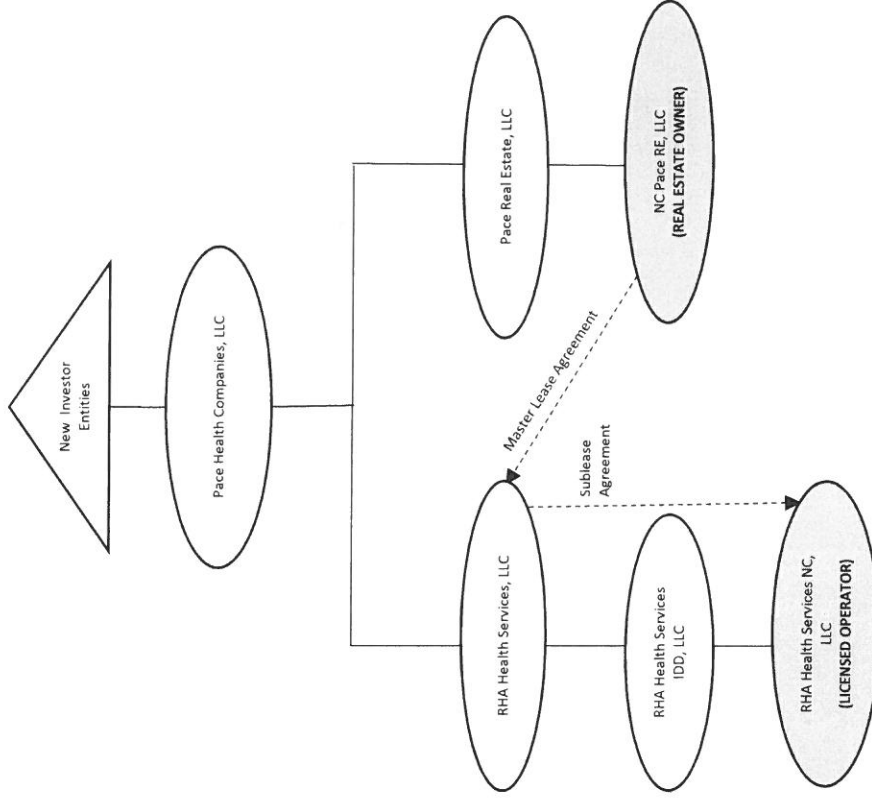
RHA Health Services

North Carolina Operations*

BEFORE



AFTER



*Non-ICF facilities have been intentionally omitted from this diagram

