

GREGG BRANTLEY EVERETT  
DIRECT DIAL: (334) 409-2228  
EMAIL: GEVERETT@GILPINGIVHAN.COM

March 30, 2026

**ELECTRONICALLY FILED AT:**  
[shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov)  
**WITH COPIES TO:**  
[Emily.marsal@shpda.alabama.gov](mailto:Emily.marsal@shpda.alabama.gov)  
and [Teresa.lee@shpda.alabama.gov](mailto:Teresa.lee@shpda.alabama.gov)

Ms. Emily Marsal, Executive Director  
State Health Planning and Development Agency  
100 North Union Street, Suite 870  
Montgomery, Alabama 36104

*Re:* **Notice of Change of Ownership of Bullock County Rural Emergency Hospital**  
SHPDA ID No. 011-6531013  
Transfer From: R&R Partners, LLC/Professional Resource Management, Inc.  
Transfer To: Bullock County Health Care Authority  
Our File No.: 13052.0001

Dear Ms. Marsal:

Our firm represents **Professional Resource Management, Inc.** (hereafter, “Seller” or “PRM”), the operator of Bullock County Rural Emergency Hospital (“BCHRE” or the “REH”). Seller is selling its ownership of the REH to the **Bullock County Health Care Authority** (“Purchaser” or “BCHCA”), and we are filing the enclosed Notice of Change of Ownership/Control in conjunction with the proposed transaction.

Pursuant to the Rules and Regulations of the Alabama Certificate of Need Program, Chapter 410-1-7-.04 (the “Rules”), please find enclosed the following:

- A. Change of Ownership/Control Notice prepared in connection with the transfer of ownership of the Hospital from the Seller to the Purchaser; and
- B. A check in the amount of \$3,000.00, payable to the Alabama State Health Planning and Development Agency (“SHPDA” or “the Agency”).

BCHCA (f/k/a Bullock County Hospital Board<sup>1</sup>) obtained grandfathered certificate of need authorization to operate Bullock County Hospital. BCHCA leased the real estate and certificate of need

---

<sup>1</sup> Bullock County Hospital Board filed a Certificate of Reincorporation to reincorporate as a health care authority on or about June 27, 2019. A copy of the Certificate of Reincorporation is enclosed for reference.

GILPIN GIVHAN

Emily Marsal, Executive Director  
SHPDA  
March 30, 2026  
Page 2

for Bullock County Hospital to Professional Resource Management, Inc. on August 15, 1994. SHPDA was notified of the lease through a Change of Ownership/Control notification. The lease between BCHCA and PRM is still active. On July 20, 2020, the Agency was notified that 100% of the outstanding capital stock of PRM was being purchased by R&R Partners, LLC ("R&R"). R&R still owns 100% of the outstanding capital stock of PRM, and Robert Lubin is the sole member of R&R.

On May 1, 2024, Bullock County Hospital converted to Rural Emergency Hospital status and began operating as BCREH. The Agency approved the conversion after a reviewability request was submitted on March 1, 2024. The Alabama Department of Public Health subsequently approved a Rural Emergency Hospital license, and the Centers for Medicare and Medicaid Services approved enrollment of BCREH in the Medicare program as a Rural Emergency Hospital. PRM has continued to operate BCREH since that time.

PRM and BCHCA have entered into discussions for a proposed transaction that would: (i) terminate the existing lease between BCHCA and PRM; and (ii) transfer from PRM<sup>2</sup> to BCHCA certain tangible and intangible assets necessary to operate BCREH (including without limitation all rights to the certificate of need authority to operate BCREH). The parties anticipate this transaction will close on or about April 6, 2026.

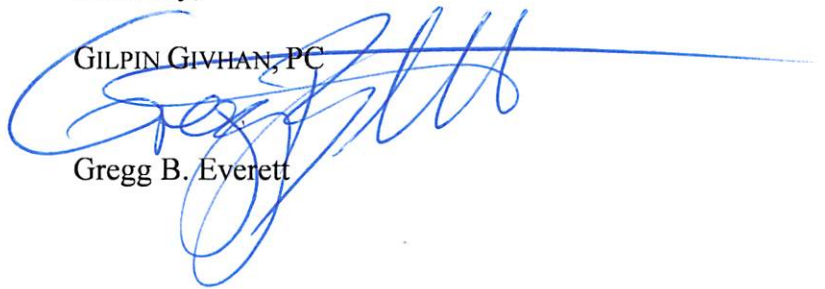
Based upon the above description of the proposed transaction and the enclosed Notice of Change of Ownership/Control, we respectfully request that SHPDA approve the Change of Ownership described herein and confirm that a Certificate of Need is not required in connection with the proposed transaction.

Thank you for your consideration of this request. If you have any questions, or if you require any additional items or information in connection with the matter addressed above, please feel free to call me at (334) 409-2228, or contact Purchaser's representative, Elizabeth Smithart, Esq., at (334) 738-8683.

Sincerely,

GILPIN GIVHAN, PC

Gregg B. Everett



GBE/sd

Enclosures

---

<sup>2</sup> R&R will also transfer all right, title, and interest it may have in the certificate of need authorization for BCREH to BCHCA, to the extent necessary based on the 2020 Notice of Change of Ownership/Control filed with respect to R&R's acquisition of all of the outstanding capital stock in PRM.

GILPIN GIVHAN

Emily Marsal, Executive Director  
SHPDA  
March 30, 2026  
Page 3

cc: Mr. Robert Lubin  
Elizabeth Smithart, Esq.

4937-9735-9767, v. 3

**NOTICE OF CHANGE OF OWNERSHIP/CONTROL**

The following notification of intent is provided pursuant to all applicable provisions of ALA. CODE § 22-21-270 (1975 as amended) and ALA. ADMIN. CODE r. 410-1-7-.04. This notice must be filed at least twenty (20) days prior to the transaction.


- Change in Direct Ownership or Control (of a vested Facility; ALA. CODE §§ 22-20-271(d), (e))
  - Change in Certificate of Need Holder (ALA. CODE § 22-20-271(f))
  - Change in Facility Management (Facility Operator)
- Any transaction other than those above-described requires an application for a Certificate of Need.

**Part I: Facility Information**

SHPDA ID Number: 011-6531013  
(This can be found at [www.shpda.alabama.gov](http://www.shpda.alabama.gov), Health Care Data, ID Codes)

Name of Facility/Provider: Bullock County Rural Emergency Hospital  
(ADPH Licensure Name)

Physical Address: 102 W. Conecuh Avenue  
Union Springs, AL 36089

County of Location: BULLOCK 

Number of Beds/ESRD Stations: 0

CON Authorized Service Area (Home Health and Hospice Providers Only). Attach additional pages if necessary. \_\_\_\_\_

**Part II: Current Authority** (Note: If this transaction will result in a change in direct ownership or control, as defined under ALA. CODE § 22-20-271(e), please attach organizational charts outlining current and proposed structures.)

Owner (Entity Name) of Facility named in Part I: Professional Resource Management, Inc.

Mailing Address: 102 W. Conecuh Avenue  
Union Springs, AL 36089

Operator (Entity Name): Professional Resource Management, Inc.

**Part III: Acquiring Entity Information**

Name of Entity: Bullock County Health Care Authority

Mailing Address: 102 W. Conecuh Avenue  
Union Springs, AL 36089

Operator (Entity Name): Bullock County Health Care Authority

Proposed Date of Transaction is on or after: 04/06/2026

**Part IV: Terms of Purchase**

Monetary Value of Purchase: \$ To be provided

Type of Beds: No inpatient beds

Number of Beds/ESRD Stations: 0

**Financial Scope:** to Include Preliminary Estimate of the Cost Broken Down by Equipment, Construction, and Yearly Operating Cost:

Projected Equipment Cost: \$ 0.00

Projected Construction Cost: \$ 0.00

Projected Yearly Operating Cost: \$ 6.6 Million (None New)

Projected Total Cost: \$ 0.00

**On an Attached Sheet Please Address the Following:**

- 1.) The services to be offered by the proposal (the applicant will state whether he has previously offered the service, whether the service is an extension of a presently offered service, or whether the service is a new service).
- 2.) Whether the proposal will include the addition of any new beds.
- 3.) Whether the proposal will involve the conversion of beds.
- 4.) Whether the assets and stock (if any) will be acquired.

**Part V: Certification of Information**

**Current Authority Signature(s):**

The information contained in this notification is true and correct to the best of my knowledge and belief.

Owner(s): (To be provided later)

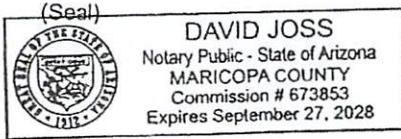
Operator(s): Jacob Lubin

Title/Date: VP 3/31/26

[Signature]

[Signature]

SWORN to and subscribed before me, this 31 day of March, 2026.



[Signature]  
Notary Public

My Commission Expires: 9-27-2028

Acquiring Authority Signature(s):

I agree to be responsible for reporting of all services provided during the current annual reporting period, as specified in ALA. ADMIN. CODE r. 410-1-3-.12. The information contained in this notification is true and correct to the best of my knowledge and belief.

Purchaser(s): Bullock County Health Care Authority  
 Operator(s): Bullock County Health Care Authority  
 Title/Date: Chairman Wendy Hodge

SWORN to and subscribed before me, this 27<sup>th</sup> day of March, 2026.

(Seal)



Cynthia Beth Cox  
Notary Public

My Commission Expires: 11-26-29

Author: Alva M. Lambert  
 Statutory Authority: § 22-21-271(c), Code of Alabama, 1975  
 History: New Rule

SWORN to and subscribed before me, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

(Seal)

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_

**Acquiring Authority Signature(s):**

I agree to be responsible for reporting of all services provided during the current annual reporting period, as specified in ALA. ADMIN. CODE r. 410-1-3-.12. The information contained in this notification is true and correct to the best of my knowledge and belief.

Purchaser(s): Bullock County Health Care Authority

Operator(s): Bullock County Health Care Authority

Title/Date: Chairman Wendy Andy Hodge

SWORN to and subscribed before me, this 27<sup>th</sup> day of March, 2020.

(Seal)

Cynthia Beth Cox  
Notary Public

My Commission Expires: 11-26-29



Author: Alva M. Lambert  
Statutory Authority: § 22-21-271(c), Code of Alabama, 1975  
History: New Rule

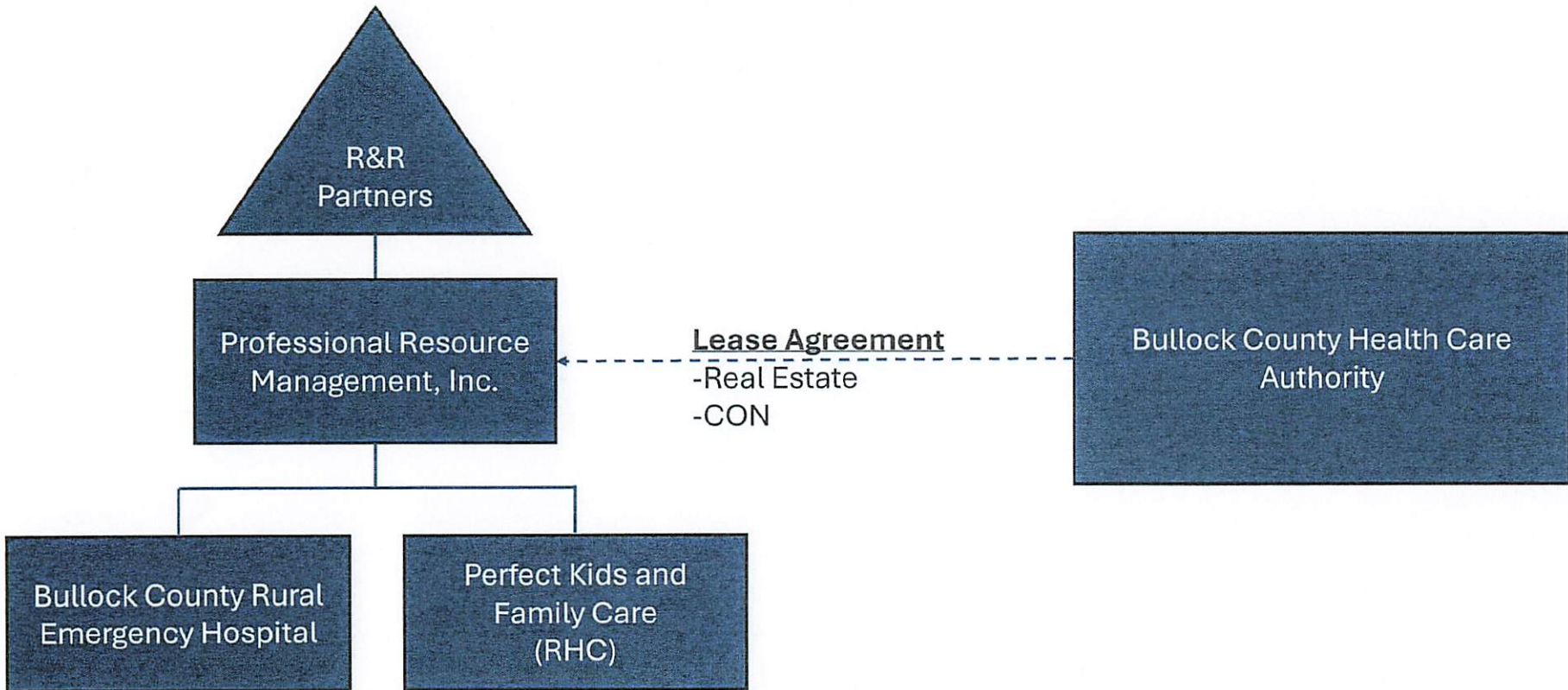
NOTICE OF CHANGE OF OWNERSHIP/CONTROL  
HOSPITAL

Part II Attachment: Current and Proposed Organizational Charts

Please see attached the following:

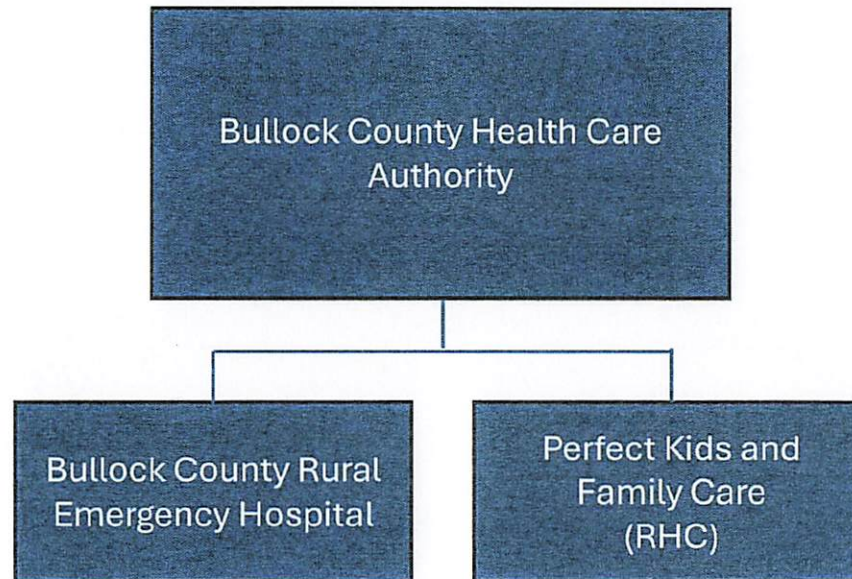
1. Current Organizational Chart
2. Proposed Organizational Chart

# Current Organizational Structure



- R&R Partners, LLC is the sole shareholder of Professional Resource Management, Inc. (PRM)
- Bullock County Health Care Authority (f/k/a Bullock County Hospital Board) (BCHCA) owns the real estate and certificate of need and leases the same to PRM.

# Proposed Organizational Structure



- As a result of the proposed transaction:
  - The lease between BCHCA and PRM will be terminated.
  - BCHCA will purchase certain tangible and intangible assets used in the operation of Bullock County Rural Emergency Hospital (BCREH) and will own the real estate and operations of BCREH.

Part IV Attachment: Terms of Purchase

1. Services offered by Bullock County Rural Emergency Hospital (“BCREH” or the “REH”) will include emergency and other outpatient services eligible to be provided as an REH under Ala. Admin. Code Ch. 420-5-23. No inpatient services will be provided. All services to be provided at the REH are continuations of existing services. No new services will be added at this time.
2. There will be no new beds added.
3. There will be no conversion of beds.
4. The proposed transaction will entail cancellation of the existing lease between Bullock County Health Care Authority f//k/a Bullock County Hospital Board as lessor (“BCHCA”) and Professional Resource Management, Inc. as lessee (“PRM”) and the sale of certain assets of PRM and its sole shareholder, R&R Partners, LLC (“R&R”),<sup>1</sup> used in the operation of the REH (personal property, equipment, intangible assets, operational control, and certain ancillary real property) to BCHCA. No stock is involved in this transaction.

Note on Financial Scope:

There are no new operating costs associated with this project as BCHCA is only assuming existing operations and service lines.

---

<sup>1</sup> BCHCA has grandfathered certificate of need (“CON”) authorization due to operation of Bullock County Hospital since prior to the establishment of the Alabama CON program. PRM acquired the rights to the CON for Bullock County Hospital by virtue of the lease from BCHCA in 1994. In 2020, PRM filed a Notice of Change of Ownership with SHPDA related to the acquisition of all of the outstanding capital stock in PRM by R&R. While we do not believe that this transaction resulted in a transition of the ownership of the CON from PRM to R&R, both parties are listed here for reference and hereby transfer any and all interests that may have in the CON to BCHCA.