October 20, 2020

BY PERSONAL DELIVERY
CEO David Dobozenski or Administrative Designate
St. Croix Regional Medical Center
235 State St.
St. Croix Falls, WI 54024

Re: Records of review and evaluation of Liegeois health care services

Dear Sir or Madam:

In late 2014, I was employed as a physician at St. Croix Regional Medical Center. My employment ended in part as a result of allegations concerning my patient care. In a signed notarized affidavit to the Wisconsin Medical Examining Board, Chief Medical Officer Dr. Jeffrey Hall states he did a "chart review," and "investigation." WIS. STAT. § 146.38(3)(a) requires that information acquired in connection with the review and evaluation of health care services shall be disclosed and records of such review and evaluation shall be released to the health care provider whose services are being reviewed or evaluated, upon the request of such provider, with the identity of any patient whose treatment is reviewed being withheld. This letter constitutes my request for those records.

I request delivery of the materials directly to me: 13260 322nd St Lindstrom MN 55045 by 2pm October 30, 2020.

Thank you for your attention to this matter.

Sincerely,

Nanette Liegeois M.D., Ph.D.

Margaret Charpentier
Margaret Charpentier
1. Hr: Para Legal
10-20-2020 2:37 pm

I, Jon Everson, being duly under oath, state as follows:

I delivered a copy of the attached letter to CEO David Dobosenski at Saint Croix Regional Medical Center located at 235 State Street in Saint Croix Falls Wisconsin on October 20, 2020. The hospital paralegal, Ms. Charpentier, received the letter.

Jon Everson
Everson Detective Agency
112 Cascade St. N.
P.O. Box 247
Osceola, WI 54020

Subscribed and sworn to before me
This 21 day of ~~December~~ October 2020

Notary Public
Polk County, Wisconsin
My Commission expires 7-22-2022

BRADY LANGER
NOTARY
PUBLIC
STATE OF WISCONSIN

FELHABER LARSON

ATTORNEYS AT LAW

Stephen E. Yoch
Direct: 612-373-8559
Email: syoch@felhaber.com

October 30, 2020

Dr. Nanette Liegeois
13260 322nd Street
Lindstrom, MN 55045

RE: Wis. Stat. § 146.38(3)(a) records request
Our File No. 003308.00050

Dear Dr. Liegeois,

This letter is in response to your letter dated October 20, 2020 requesting "records of review and evaluation of health care services" pursuant to Wisconsin Statutes Section 146.38(3)(a). St. Croix Regional Medical Center will not be providing the requested documents because you have requested documents that are not within the scope of what is required to be produced under section 146.38(3)(a).

The ability to receive documents related to a "review and evaluation of health care services" as contemplated by section 146.38 is limited to actions that are commissioned by a formal peer review process. A party asserting that a particular investigation is subject to the statute has the burden of establishing two conditions:

> First, the investigation must be part of a program organized and operated to improve the quality of health care at the hospital...Second, the person conducting the investigation must be acting on behalf of, or as part of a group with relatively consistent membership, officers, a purpose and a set of regulations.

Phelps v. Physicians Ins. Co. of Wisconsin, Inc., 698 N.W.2d 643, 658 (Wis. 2005) (citations omitted).

Dr. Hall's affidavit makes clear that his chart review was initiated in response to concerns from the nursing staff related to your behavior and the review was for the purposes of a report to the Wisconsin Medical Board not for peer review. His "investigation" was not part of a "program organized and operated to improve the quality of health care at the hospital," and Dr. Hall was not acting on behalf of a

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peer review committee or any analogous group when he prepared the Affidavit to the Wisconsin Medical Examining Board.

St. Croix Regional Medical Center respectfully declines to provide you with the documents you requested for the reasons outlined above.

Yours very truly,

/s/ Stephen E. Yoch

Stephen E. Yoch