

**O.C.G.A. § 31-7-22(b)(2)(E) Response Regarding Joint Ventures,  
Partnerships, Subsidiary Holding Companies, and Captive Insurance  
Companies**

Please note that O.C.G.A. § 31-7-22(b)(2)(E) requires nonprofit hospitals in Georgia to post a “[l]isting of any ownership or interest the nonprofit hospital has in any joint venture, partnership, subsidiary holding company, or captive insurance company, where such entity is domiciled; and the value of any such ownership or interest.”

Based on a reasonable interpretation, there are nine relevant hospitals<sup>1</sup> within the Emory Healthcare system for purposes of disclosures under O.C.G.A. § 31-7-22: Emory University Hospital,<sup>2</sup> Emory University Hospital Midtown, Emory University Orthopaedics & Spine Hospital, Emory University Hospital Smyrna, Emory Saint Joseph’s Hospital, Emory Johns Creek Hospital, Emory Decatur Hospital, Emory Hillandale Hospital, and Emory Long Term Acute Care.

At this time, the following are joint ventures, partnerships, subsidiary holding companies, or captive insurance companies in which one or more of the aforementioned hospitals has an ownership or interest.

1. Emory University Hospital Midtown has a 50% ownership interest in Crawford Long – CPI, LLC, a Georgia limited liability company joint venture with respect to the medical office tower on Emory University Hospital Midtown’s primary campus.

Although the following do not constitute a joint venture, partnership, subsidiary holding company, or captive insurance company in which an Emory Healthcare hospital has an ownership or interest, in the interest of transparency, please also note the following:

- A. EHC/JOC Holdings, LLC is a subsidiary of Emory Healthcare, Inc. EHC/JOC Holdings, LLC has a 51% ownership interest in Emory/Saint Joseph’s, Inc., which is the parent entity for Saint Joseph’s Hospital of

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<sup>1</sup> Based on a reasonable interpretation, this excludes Emory Rehabilitation Hospital as not being subject to O.C.G.A. § 31-7-22.

<sup>2</sup> Emory University Hospital includes, without limitation, Emory University Hospital at Wesley Woods.

Atlanta, Inc. (d/b/a Emory Saint Joseph's Hospital) and is the grandparent entity for EHCA Johns Creek, LLC (d/b/a Emory Johns Creek Hospital).

B. Emory Healthcare, Inc. has a 35% ownership interest in Emory-Adventist, Inc., the entity which formerly owned and operated the former Emory-Adventist Hospital in Cobb County.

C. The Clifton Casualty Insurance Company, Ltd. is a subsidiary of Emory Healthcare, Inc. The Clifton Casualty Insurance Company, Ltd. is a captive insurance company. The Clifton Casualty Insurance Company, Ltd. provides certain liability coverages for the Emory Healthcare hospitals in addition to certain liability coverages for other entities, units, divisions, and aspects of the Emory Healthcare and Emory University enterprise.

Please note that joint ventures, partnerships, and subsidiary holding companies which do not relate to the operation of a nonprofit hospital or former hospital, or which do not relate to a hospital in which there is a majority or controlling interest, are not listed here.

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