

June 17, 2024

VIA EMAIL: (JONATHAN.PFINGSTEN@NRC.GOV)

Jonathan Pfingsten
Sr. Health Physicist
U.S. NRC Region I
475 Allendale Rd., Suite 102
King of Prussia, PA 19406-1415

**Re: Notice of Transaction
Delaware Cardiovascular Associates, P.A. – License No. 07-30420-01**

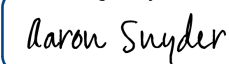
Dear Mr. Pfingsten:

We wish to inform you of our awareness of, and intent to consummate, the transaction described in a previously issued letter and attachments, dated June 14, 2024 (the “June 14 Letter”), notifying the U.S. Nuclear Regulatory Commission (“NRC”) of a proposed transaction implicating the Materials License, License No. 07-30420-01, (the “License”); the June 14 Letter and its enclosures are included here as Attachment 1.

As described in the June 14 Letter, eight physician owners each hold 12.5% of the ownership interests in DCA (the “Current Physician Owners”). Pursuant to the terms of an asset transaction, DCA will sell its non-clinical assets to U.S. Health Delaware, LLC, owned by ultimate parent company U.S. Health Partners (the “Buyer”), an entity in which the Current Physician Owners will hold equity interests. The clinical assets will be purchased by Cardiology Physicians, LLC (“Clinical Buyer”), which is owned by Dr. Aaron Snyder, M.D. (the “Proposed Transaction”). We refer you to the June 14 Letter for more details regarding the Proposed Transaction. The Clinical Buyer is aware of the Proposed Transaction and anticipates that it will close on or before July 20, 2024. As requested by DCA, we similarly **request an expedited review of this filing in order that the License be placed into the name of the Clinical Buyer.**

If you have any questions regarding this submission, please contact me at the contact information below.

Sincerely,

DocuSigned by:

EB4E7350DA29411...
Aaron Snyder, MD FACEP
Chief Executive Officer
Cardiology Physicians, LLC

Cc: Gaetano Pastore, Radiation Safety Officer

Enclosure: Attachment 1

June 14, 2024

Via Email: (jonathan.pfingsten@nrc.gov)

Jonathan Pfingsten
Sr. Health Physicist
U.S. NRC Region I
475 Allendale Rd., Suite 102
King of Prussia, PA 19406-1415

**Re: Notice of Transaction Impacting Delaware Radioactive Material License
Held by Delaware Cardiovascular Associates, P.A. - License No. 07-30420-01**

Dear Mr. Pfingsten:

Delaware Cardiovascular Associates, P.A. (“DCA”), hereby notifies the U.S. Nuclear Regulatory Commission (the “USNRC”) of a proposed transaction implicating the Materials License, License No. 07-30420-01, (the “License”), issued by USNRC to DCA. The License is active for the following six (6) locations (the “Facilities”):

1. Suite 100, 1113 S. State St., Dover, Delaware 19901
2. 34453 King St. Row, Lewes, Delaware 19958
3. 415 S. DuPont Highway, Milford, Delaware 19963
4. Suite 105, 537 Stanton-Christiana Rd. Newark, Delaware 19713
5. 92A Atlantic Ave., Ocean View, Delaware 19970
6. Suite 200, 121 Beckswoods Dr., Bear, Delaware 19701

Currently, eight physician owners each hold 12.5% of the ownership interests in DCA (the “Current Physician Owners”). Pursuant to the terms of an asset transaction, DCA will sell its non-clinical assets to US Health Delaware, LLC, owned by ultimate parent company US Health Partners, LLC (the “Buyer”), an entity in which the Current Physician Owners will hold equity interests. The clinical assets will be purchased by Cardiology Physicians, LLC (“Clinical Buyer”), which is owned by Dr. Aaron Snyder, M.D. (the “Transaction”). Dr. Snyder is a known entity to the USNRC and has completed the requisite background screening. The Clinical Buyer engages the Buyer to provide certain non-clinical management services to the Clinical Buyer; however, the parties expressly agree that such management does not and will not interfere with the ultimate authority of the Clinical Buyer in connection with the License. The Transaction is anticipated to close on or before July 20, 2024.

The Transaction will have no impact on the Facilities’ physicians or other personnel, locations, provision of medical and professional services, or any other licensed activities. Post-Transaction, the Facilities’ day-to-day clinical operations and professional and licensed activities will remain

Jonathan Pfindgen
Sr. Health Physicist
U.S. Nuclear Regulatory Commission
June 14, 2024
Page 2

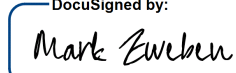
unchanged. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction, including but not limited to the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D.

We refer you to the two (2) attachments included with this notice, which contain the information required by the USNRC to evaluate the Transaction. Specifically, Attachment A provides the following information: (a) a description of the transaction; (b) a description of any changes of personnel, location, equipment, and procedures; (c) DCA's surveillance records; (d) decommissioning and related record transfers; and (e) the transferee's commitment to abide by the transferor's commitments. Attachment B presents pre- and post-transaction organizational charts.

The parties to the Transaction recognize that the consummation of the Transaction will effectuate a change of ownership and authority over the License. **As such, we respectfully request an expedited review of this filing in order that the License be placed into the name of the Clinical Buyer.**

DCA is committed to working with the USNRC to effectuate this transfer as expeditiously as possible as part of the proposed Transaction. The parties desire the Transaction to close on or before July 20, 2024. If you have any questions or comments pertaining to this submission, please contact Elizabeth Sullivan at McDonald Hopkins LLC (216-348-5401 or esullivan@mcdonaldhopkins.com), or Patrick Campbell at McDonald Hopkins LLC (216-348-5405 or pcampbell@mcdonaldhopkins.com).

Sincerely,

DocuSigned by:

3A34145F59874C2...

Mark Zweben
President
Delaware Cardiovascular Associates, P.A.

Enclosures:

Attachment A, Information Needed for Change of Control Notice
Attachment B, Pre- and Post-Transaction Organizational Charts

ATTACHMENT A

Below is a list of the information required by USNRC to review a change of control application related to a Materials License. Information is being provided in response to these requests to assist USNRC in its review of the request made by Delaware Cardiovascular Associates, P.A., in the foregoing letter.

INFORMATION NEEDED FOR CHANGE OF CONTROL NOTICE

1. Description of Transaction

Currently, eight physician owners each hold 12.5% of the ownership interests in DCA (the “Current Physician Owners”). Pursuant to the terms of an asset transaction, DCA will sell its non-clinical assets to US Health Delaware, LLC, an entity wholly-owned by ultimate parent company, US Health Partners, LLC (the “Buyer”). The Current Physician Owners will have equity interests in Buyer. The clinical assets will be purchased by Cardiology Physicians, LLC (the “Clinical Buyer”) which will be owned by Dr. Aaron Snyder, M.D. (the “Transaction”). Both Cardiology Physicians, LLC and Dr. Snyder are known entities to the USNRC as they hold existing radioactive materials in the state of Delaware. The Clinical Buyer engages the Buyer to provide certain non-clinical management services; however, the parties expressly agree that such management does not and will not interfere with the ultimate authority of the Clinical Buyer in connection with the License. The Transaction is anticipated to close on or before July 20, 2024.

The Transaction will have no impact on the Facilities’ physicians or other personnel, locations, provision of medical and professional services, or any other licensed activities. Post-Transaction, the Facilities’ day-to-day clinical operations and professional and licensed activities will remain unchanged. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction, including but not limited to the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D.

2. Changes of Personnel

The Transaction will not result in any change to personnel listed on and associated with the License, including, but not limited to, the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction. Dr. Aaron Snyder, M.D. (“Dr. Snyder”) will own the Clinical Buyer which will hold the License after the Transaction. Of note, Dr. Snyder is the owner of Materials License 07-30713-01.

3. Changes of Location, Equipment & Procedures

The Transaction will not change the locations, equipment, or procedures under the License. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction.

4. Surveillance Records

All surveillance has been performed, documented, and reviewed on a timely basis. Surveillance activities will not change as a result of the Transaction.

5. Decommissioning and Related Records Transfers

As stated above, the Transaction will not result in any changes to the Facilities' operations, services, locations, equipment, procedures, or personnel. Therefore, no decommissioning will be required as a result of the Transaction. However, all records relating to activities under this License transferred to the Clinical Buyer.

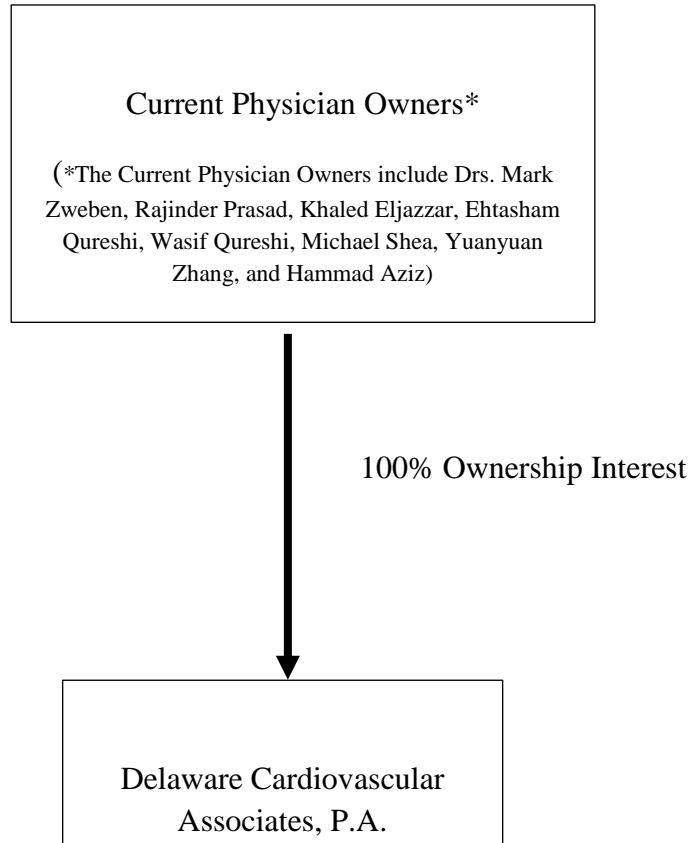
6. Transferee's Commitment to Abide by the Transferor's Commitments

The Clinical Buyer agrees to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the License.

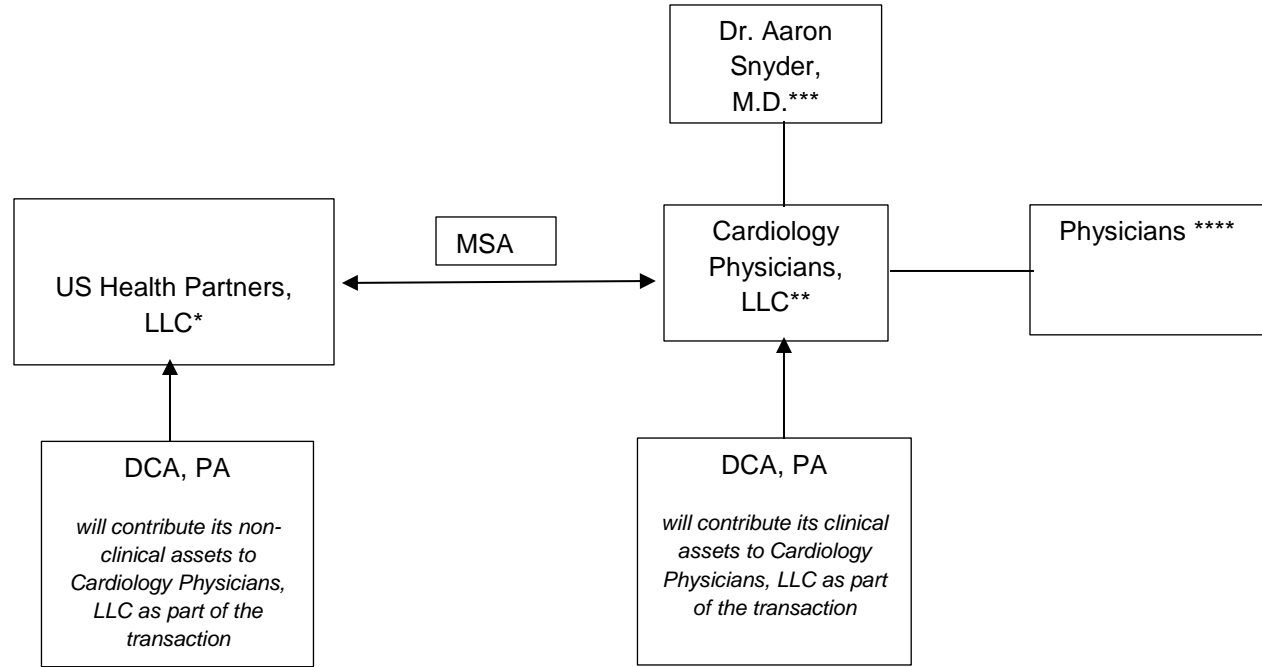
ATTACHMENT B

PRE- AND POST-TRANSACTION ORGANIZATIONAL CHARTS

PRE-TRANSACTION ORGANIZATIONAL CHART



POST-TRANSACTION ORGANIZATIONAL CHART



* US Health Partners, LLC, a USNRC known entity, will be engaged to perform non-clinical management services for Cardiology Physicians, LLC, pursuant to a Management Services Agreement.

** Cardiology Physicians, LLC, a known USNRC entity, will hold the Materials License and other clinical assets.

*** Dr. Aaron Snyder, M.D., a known USNRC entity, is the owner of Cardiology Physicians, LLC.

****The Physicians will be engaged by Cardiology Physicians, LLC via employment agreements to perform medical services, including the same activities licensed under the Materials License currently held by Delaware Cardiovascular Associates, P.A.

Certificate Of Completion

Envelope Id: D8EC50750ACA41A5B4C3916532CB4391	Status: Completed
Subject: Complete with DocuSign: NRC Notice 6.17.24(1610817488.1).docx, Notice of Transaction Impacting ...	
Client Matter Number: 0000000000	
Source Envelope:	
Document Pages: 9	Signatures: 1
Certificate Pages: 4	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelopeld Stamping: Enabled	Lizzie Abramson
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	Harbor East 650 S. Exeter Street
	Suite 1100
	Baltimore, MD 21202-4576
	Lizzie.Abramson@us.dlapiper.com
	[REDACTED]


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Status: Original	Holder: Lizzie Abramson	Location: DocuSign
6/18/2024 2:01:04 PM	Lizzie.Abramson@us.dlapiper.com	

Signer Events

Aaron Snyder
aaron@ushphealth.com
CEO
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:

EB4E7350DA29411...
Signature Adoption: Pre-selected Style
[REDACTED]
Signed using mobile

Timestamp

Sent: 6/18/2024 2:02:15 PM
Viewed: 6/18/2024 2:26:18 PM
Signed: 6/18/2024 2:27:44 PM

Electronic Record and Signature Disclosure:
Accepted: 12/26/2022 9:34:59 PM
[REDACTED]

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	6/18/2024 2:02:15 PM
Certified Delivered	Security Checked	6/18/2024 2:26:18 PM
Signing Complete	Security Checked	6/18/2024 2:27:44 PM
Completed	Security Checked	6/18/2024 2:27:44 PM

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Electronic Record and Signature Disclosure		

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If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

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If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

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Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

How to contact DLA piper:

You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

To contact us by email send messages to: docusigncoordinators@us.dlapiper.com

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To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at docusigncoordinators@us.dlapiper.com and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

If you created a DocuSign account, you may update it with your new email address through your account preferences.

To request paper copies from DLA piper

To request delivery from us of paper copies of the notices and disclosures previously provided by us to you electronically, you must send us an email to docusigncoordinators@us.dlapiper.com and in the body of such request you must state your email address, full name, mailing address, and telephone number. We will bill you for any fees at that time, if any.

To withdraw your consent with DLA piper

To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:

- i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;
- ii. send us an email to docusigncoordinators@us.dlapiper.com and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

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To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

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- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify DLA piper as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by DLA piper during the course of your relationship with DLA piper.