



4. This action is brought pursuant to the Arkansas Survival of Actions Statute, Ark. Code Ann. § 1662-101 and the Arkansas Wrongful Death Act, Ark. Code Ann. § 1662-102.

5. Defendant The Brookfield at Fianna Oaks, LLC is an Arkansas domestic Limited Liability Company with its principal place of business at 2300 Fianna Oaks, Fort Smith, Arkansas, 72715. Its agent for service of process is the Corporation Service Company, 300 Spring Building, Suite 900, 300 S. Spring Street, Little Rock, Arkansas, 72201. The Brookfield at Fianna Oaks, LLC, owned and operated an assisted living facility wherein Maurice Brigance, Jr. and his spouse, Dorothy Brigance, resided.

6. Upon information and belief, Wilson, Darnell and Mann, PA (hereinafter referred to as WDM), a professional association located at 105 North Washington, Wichita, Kansas. WDM, is the architectural firm who designed The Brookfield at Fianna Oaks, LLC facility.

7. Defendant Crawford Construction Company is an Arkansas domestic corporation. It may be served through its agent, Gary Crawford, 1103 South 28th Street, Van Buren, Arkansas, 72956. Defendant Crawford Construction Company designed, built, and inspected The Brookfield at Fianna Oaks.

8. Defendant Crawford Construction Company, Inc. is an Arkansas domestic corporation. It may be served through its agent, Gary Crawford, 1103 South 28th Street, Van Buren, Arkansas, 72956. Defendant Crawford Construction Company, Inc., designed, built, and inspected The Brookfield at Fianna Oaks.

9. Defendant, Robert "Bob" Brooks ("B. Brooks") an individual, was at all times relevant hereto the owner and operator of Defendant The Brookfield at Fianna Oaks, LLC. He exerted personal control over such business by personally supervising, inspecting, and overseeing the operations of Defendant The Brookfield at Fianna Oaks, LLC on or about the



dates of the occurrences which made the basis of this lawsuit. Defendant, B. Brooks, for all times material to this lawsuit conducted business in Arkansas and continues to do business in Arkansas.

10. Defendant, Mitzi Bailey (“M. Bailey”), was at all times material hereto the administrator for The Brookfield at Fianna Oaks, LLC, on or about the dates of the occurrences, and is a resident of the State of Oklahoma. Defendant, M. Bailey, for all times material to this lawsuit conducted business in Arkansas and continues to do business in Arkansas. Defendant M. Bailey’s contacts with Arkansas are systematic and ongoing such that Defendant M. Bailey could reasonably expect to be haled into an Arkansas court.

11. This Court has jurisdiction over the parties hereto, the subject matter hereof, and venue is proper.

#### FACTUAL ALLEGATIONS

12. Maurice Brigance, Jr. was a resident of The Brookfield at Fianna Oaks, located at 2300 Fianna Oaks, Fort Smith, Arkansas, 72715, from on or about May 27, 2008, until January 7, 2009.

13. Prior to January 7, 2009, Maurice Brigance, Jr. was relatively healthy by any standard for a man 20 years his junior and independently ambulatory.

14. On or about January 7, 2009, as Maurice Brigance, Jr. was attempting to open the door to the closet in his room at The Brookfield at Fianna Oaks, the door came loose from its mounting and fell onto him causing him to sustain numerous injuries, including, but not limited to, a fractured pelvis, seriously injured knee, abdominal rupture, with possible other internal injuries that were revealed prior to death through substantial bleeding, and numerous contusions and abrasions. Maurice Brigance, Jr. was fully conscious, alert, and cognitive 22 of the 24 days

he lived following this event. His condition declined with incontinence, inability to move voluntarily, and the inability to swallow or eat for the last seven days of his life. Maurice Brigance, Jr. was fully aware of his impending death, along with his inability to eat or drink. Maurice Brigance, Jr. was caused to suffer extreme and unnecessary pain, anguish, and emotional trauma as a result of his injuries.

15. After suffering these injuries, Maurice Brigance, Jr. was hospitalized for 24 days. He remained in the hospital until he died on January 31, 2009 as a result of his injuries which were reflected in his death certificate attached as "Exhibit B".

#### NEGLIGENCE

16. The Plaintiff re-alleges and incorporates the allegations in paragraphs 1-15 as if fully set forth herein.

17. Defendants, Crawford Construction Company and/or Crawford Construction Company Inc., were negligent in the construction and supervision of construction of the facility in that they failed to follow design plans allowing an improper door tracking system to be installed in the Brigance's room

18. That Defendants, Crawford Construction Company and/or Crawford Construction Company Inc., failed to properly inspect the facility allowing improper door tracking systems to be installed in the Brigance's room.

19. The acts of negligence on the part of Crawford Construction Company and/or Crawford Construction Company Inc. were a proximate cause of the injuries and death of Maurice Brigance, Jr.

20. The Separate Defendant, The Brookfield at Fianna Oaks, LLC d/b/a The Brookfield at Fianna Oaks, was informed by Maurice Brigance, Jr. and Dorothy Brigance of



defects in the door on multiple occasions. They were further advised of defects in the door by Steven Brigance. After receiving notice of defective conditions in the door, this Separate Defendant made numerous unsuccessful attempts to correct the defect.

21. The Separate Defendant, The Brookfield at Fianna Oaks, LLC d/b/a The Brookfield at Fianna Oaks, knew or had reason to know of the dangerous or defective condition of the door and failed to take appropriate steps to protect the health and safety of Maurice Brigance, Jr.

22. The acts and omissions of the Separate Defendant, The Brookfield at Fianna Oaks, LLC d/b/a The Brookfield at Fianna Oaks, were a proximate cause of the of the injuries and death of Maurice Brigance, Jr.

23. The Separate Defendant, The Brookfield at Fianna Oaks, LLC d/b/a The Brookfield at Fianna Oaks, owed a non-delegable duty to residents of The Brookfield at Fianna Oaks, specifically including Maurice Brigance, Jr., to ensure that the premises were adequately safe and did not present an unreasonable risk of injury and death.

24. The Separate Defendant, WDM, knew or had reason to know at the time it designed the facility that such was intended as an assisted living facility; specifically, that the doors would be subject to use by elderly and infirm individuals. Notwithstanding this knowledge, the Defendant elected to use solid core doors, weighing approximately 80 pounds. This Defendant knew or should have known with due diligence that these doors would present an unreasonable risk of injury or death to residents of The Brookfield at Fianna Oaks facility in the event the door or doors broke or otherwise separated from their fittings or track system. The acts and omissions of the Separate Defendant, WDM, were a proximate cause of the injuries and death of Maurice Brigance, Jr.

25. The Separate Defendant, WDM, failed to properly inspect the facility to determine that the door tracking system was not installed as designed or intended.

26. The Separate Defendant, B. Brooks, failed to properly personally inspect, supervise, or maintain the facility in a safe, prudent manner. As such, the acts and omissions of the Separate Defendant, B. Brooks, were a proximate cause of the injuries and death of Maurice Brigance, Jr.

27. The Separate Defendant, M. Bailey, failed to properly personally inspect, supervise, or maintain the facility in a safe, prudent manner. As such, the acts and omissions of Separate Defendant, M. Bailey, were a proximate cause of the injuries and death of Maurice Brigance, Jr.

28. The acts or omissions set forth above are matters which were within each of the Defendants areas of responsibility. More specifically, the injuries, suffering, and death of Maurice Brigance, Jr. were directly and proximately caused by acts of negligence on the part of the defendants both jointly and severally, as follows:

- a. Defendants selected and installed improper doors and/or mountings;
- b. Defendants improperly installed the door and its mountings;
- c. Defendants failed to properly inspect the door and its mountings;
- d. Defendants were aware that the doors created a dangerous condition, and failed to repair it;
- e. Defendants were aware that the doors created a dangerous condition, and failed to warn Maurice Brigance, Jr., of the risk.

29. As a direct and proximate result of each of the Defendants' failure to perform the responsibilities as set forth above, Maurice Brigance, Jr. suffered physical injuries, including a



fractured hip, ruptured abdomen, seriously injured knee, possible other internal injuries, substantial bleeding, and numerous contusions and abrasions. Maurice Brigance, Jr. also suffered extreme pain, suffering, mental anguish, and knowledge of his impending demise and death. All of the above required Maurice Brigance, Jr., to incur significant hospital and medical expenses and resulted in his death.

GROSS NEGLIGENCE, WILLFUL, WANTON,  
RECKLESS, AND/OR INTENTIONAL CONDUCT

30. Plaintiff incorporates all of the allegations made in paragraphs 1-15 above.

31. As a result of prior problems with the doors in The Brookfield at Fianna Oaks facility, defendants knew that they were placing Maurice Brigance, Jr. at risk of the injuries described hereinabove, and, despite that knowledge, took no action to make the premises safe, and recklessly, wantonly, or intentionally exposed Maurice Brigance, Jr. to the risk of the injuries he suffered.

32. The manner, scope, and severity of Defendants' failures and actions as heretofore described constitute malice and gross negligence which evidences a willful, wanton, or reckless disregard for the safety of others, including Maurice Brigance, Jr. as well as other residents of the facility. Specifically, such conduct was undertaken by Defendants without regard to the health and safety consequences to those residents, including Maurice Brigance, Jr., entrusted to their care. Further, such conduct demonstrates the Defendants' utter disrespect for their duties of care, good faith, and fidelity owed to Maurice Brigance, Jr.

33. The malice and gross negligence which evidences a willful, wanton or reckless disregard for the safety of others, including Maurice Brigance, Jr. and includes, but is not limited to, one or more of the following acts and omissions:

- a. The failure to take proper care of the upkeep of the facility;

- b. The failure to adequately inspect the facility;
- c. The failure to adequately supervise the facility;
- d. The failure to provide proper maintenance of the facility including following up on any maintenance and repairs done;
- e. The failure to preserve evidence including but not limited to removal of the fallen door from the facility;
- f. The failure to use proper hardware in installing the doors;
- g. The failure to replace faulty hardware with the correct hardware;
- h. The failure to specify the correct doors to be used in the facility;
- i. The failure of Defendants to communicate with each other regarding failure of door hardware and all problems related to the doors installed Maurice Brigance, Jr.'s room as well as doors installed in other rooms;
- j. The failure to provide adequate repairs and maintenance of the facility;
- k. The failure to maintain appropriate maintenance reports, records, and notes of repairs made;
- l. The failure to provide a safe living environment for Maurice Brigance, Jr. and other residents;
- m. The failure to adopt adequate guidelines, policies, and procedures for documenting, maintaining files, investigating, and following up to any Complaints regarding the safety of the residents' living spaces and the rest of the facility;
- n. The failure to take reasonable steps to prevent, eliminate, and correct deficiencies in the facility's safety; and



- o. The failure to protect Maurice Brigance, Jr., from harm within the facility.

BREACH OF FIDUCIARY DUTY AGAINST SEPARATE DEFENDANTS THE  
BROOKFIELD AT FIANNA OAKS, LLC, B. BROOKS, and M. BAILEY

34. The Plaintiff re-alleges and incorporates the allegations in Paragraphs 1-15 as if fully set forth herein.

35. As a resident of the separate Defendant The Brookfield at Fianna Oaks which was owned, operated by, and inspected by separate Defendant B. Brooks and run by separate Defendant M. Bailey, Maurice Brigance, Jr. was particularly dependent for his daily care and well-being upon the Defendants, their employees, and agents. Because of the nature of this dependence and the representations of the Defendants that they could and would provide necessary care, Maurice Brigance, Jr., and his family held in the Defendants a special confidence and trust which the Defendants accepted by allowing Maurice Brigance, Jr., to be a resident of their facility.

36. Maurice Brigance, Jr. and his family relied upon the supposed superior knowledge, skill, and abilities of the Defendants that the Defendants held themselves out to have.

37. By virtue of the nature of the services rendered to Maurice Brigance, Jr. by Defendants, and the special relationship which developed between the Defendants and Maurice Brigance, Jr., as well as the huge disparity of power and unequal bargaining position existing between the Defendants and Maurice Brigance, Jr., the Defendants occupied a position of confidence toward Maurice Brigance, Jr. which required fidelity, loyalty, good faith, and fair dealing by the Defendants.

38. The Defendants breached their fiduciary duty and duty of good faith and fair dealing to Maurice Brigance, Jr. by failing to provide a safe, well-maintained facility to which Maurice Brigance could have lived in.

### RESERVATION OF ADDITIONAL CLAIMS

39. Plaintiff reserves the right to plead further upon additional discovery, to state additional claims and to name additional parties to this action.

### DAMAGES

40. As a direct and proximate result of the acts of negligence on the part of the defendants, Maurice Brigance, Jr. suffered a serious personal injury including, but not limited to, medical expenses, conscious pain, suffering and loss of life. Dorothy Brigance suffered emotional anguish as a direct result of the death of Maurice Brigance, Jr., as well as loss of income, loss of consortium and companionship with her husband of over 68 years. The Statutory Wrongful Death Beneficiaries each suffered damages as allowed by law for loss of companionship and association with Maurice Brigance, Jr. The Estate of Maurice Brigance, Jr. and the Statutory Wrongful Death Beneficiaries are entitled to such damages as a jury may award at the trial of this cause.

41. The actions of the Defendants were in conscious disregard to the safety and welfare of Maurice Brigance, Jr. from which malice may be inferred entitling the Plaintiff to punitive damages.

### DEMAND FOR JURY TRIAL

The Plaintiff demands a jury trial for all issues of fact presented by this action.

WHEREFORE, PREMISES CONSIDERED, plaintiff prays that summons be issued for the defendants, and that following a jury trial of this action the plaintiff be awarded a judgment against the defendants in an amount to which the plaintiff may be entitled to fully and fairly compensate plaintiff for all damages that have been suffered, for punitive damages as are



appropriate under the circumstances, and for any and other damages, costs, fees, and all other proper relief to which plaintiff may be entitled in the premises.

RESPECTFULLY SUBMITTED.

By: 

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REX W. CHRONISTER  
Attorney at Law  
Ark Bar No. 79032  
Chronister, Fields & Flake, PLLC  
P.O. Box 66  
Fort Smith, AR 72902  
(479) 783-4060

**CERTIFICATE OF SERVICE**

I, Rex W. Chronister, do hereby certify that I have mailed a true and correct copy of the above and foregoing Amended Complaint, on this 21 day May, 2010, to the following:

Mr. Mark W. Dossett  
DAVIS, WRIGHT, CLARK, BUTT,  
& CARITHERS  
P.O. Box 1688  
Fayetteville, AR 72702-1688

Mr. Jim Tilley  
WATTS, DONOVAN, & TILLEY  
P.A.  
200 South Commerce St., Ste. 200  
Little Rock, AR 72201-1769

Mr. Paul D. Morris  
WRIGHT, LINDSEY,  
& JENNINGS LLP  
903 N. 47<sup>th</sup> Street, Ste. 101  
Rogers, AR 72756

Mr. Andrew Clausen  
Attorney at Law  
One St. Louis Centre, Suite 5000  
Mobile, AL 36602

  
\_\_\_\_\_  
REX W. CHRONISTER

IN THE CIRCUIT COURT OF SEBASTIAN COUNTY, ARKANSAS  
FORT SMITH DISTRICT  
PROBATE DIVISION *II*

IN THE MATTER OF THE  
MAURICE BRIGANCE, Jr., deceased

PR-2009- 81

STEVEN A. BRIGANCE

PETITIONER

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LETTER OF  
SPECIAL PERSONAL REPRESENTATION

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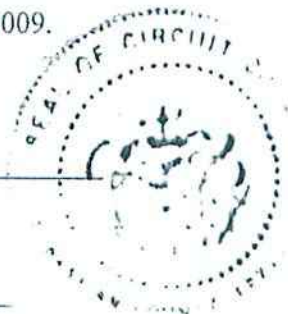
BE IT KNOWN:

That Steven A. Brigance whose address is 10101 Stephens Court, Fort Smith, AR 72908, haven been duly appointed Special Personal Representative of the Estate of Maurice Brigance, Jr., deceased, who died on our about January 31, 2009 and having qualified as such Special Personal Representative, is hereby authorized to act as, for and on behalf of the Estate and wrongful death beneficiaries and to take position of the property thereof as authorized by law and further, to conduct investigation and such legal actions as may be necessary to pursue a wrongful death cause of action on behalf of the Estate:

ISSUED this 26 day of February, 2009.

CINDY GILMER

CLERK



I, CINDY GILMER, Circuit and Probate Clerk in and for Sebastian County, Arkansas, hereby certify that the above and foregoing is a true and complete copy of the LETTERS THAT ARE NOW IN FULL FORCE AND EFFECT as the same appears of record in this office.  
Witness my hand and seal this

26 day of February 2009  
CINDY GILMER, CIRCUIT AND PROBATE CLERK

By: [Signature]  
Deputy Clerk

BY: [Signature]  
DEPUTY CLERK





# STATE OF ARKANSAS

## ARKANSAS DEPARTMENT OF HEALTH Vital Records CERTIFICATE OF DEATH

TYPE / PRINT IN  
PERMANENT  
BLACK INK  
SEE  
INSTRUCTIONS

355

1 DECEASED'S LEGAL NAME (include middle initial if known)				2 SEX	3 DATE OF DEATH (month/day/year)	4 TIME OF DEATH
Maurice "Jack" Brigrance, Jr.				Male	Jan. 31, 2009	4:47 <input type="checkbox"/> AM <input type="checkbox"/> PM
5 SOCIAL SECURITY #	6a AGE - last birthday (years)	6b UNDER 1 YEAR (Months/Days)	6c UNDER 1 DAY (Hours/Minutes)	7 DATE OF BIRTH (month/day/year)	8 BIRTHPLACE (city and state or foreign country)	
419-03-6604	93			Sept. 24, 1915	Mobile, Alabama	
9a RESIDENCE STATE OF FOREIGN COUNTRY		9b COUNTY		9c CITY OR TOWN		
Arkansas		Sebastian		Fort Smith		
10 NUMBER AND STREET			10a APT. NO.	10b ZIP CODE	10c INSIDE CITY LIMITS?	
2300 Fianna Oaks				72908	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9 EVER IN US ARMED FORCES?		10 MARITAL STATUS AT TIME OF DEATH		11 SURVIVING SPOUSE'S NAME (if wife, give name prior to her marriage)		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Married <input type="checkbox"/> Widowed <input type="checkbox"/> Never Married <input type="checkbox"/> Married but Separated <input type="checkbox"/> Divorced <input type="checkbox"/> Unknown		Dorothy Bell		
12a IF DEATH OCCURRED IN A HOSPITAL		12b IF DEATH OCCURRED SOMEWHERE OTHER THAN A HOSPITAL			12c COUNTY OF DEATH	
<input type="checkbox"/> Inpatient <input type="checkbox"/> Emergency Room <input type="checkbox"/> Outpatient <input type="checkbox"/> Deceased at Home		<input type="checkbox"/> Home <input type="checkbox"/> Hospice <input type="checkbox"/> Facility <input type="checkbox"/> Nursing Home <input type="checkbox"/> Long Term Care Facility <input type="checkbox"/> Other (Specify)			Sebastian	
12d FACILITY NAME (if inpatient only include # ward)			12e CITY OR TOWN		12f ZIP CODE	
Peachtree Palliative Care Unit			Fort Smith		72917	
13 FATHER'S NAME (if known last)			14 MOTHER'S NAME PRIOR TO FIRST MARRIAGE (if known last)			
Maurice Brigrance, Sr.			Jimmy Fitzgerald			
15a INFORMANT'S NAME		15b RELATIONSHIP TO DECEASED		15c MAILING ADDRESS (Home and/or a P.O. Box City, State, Zip Code)		
Steve Brigrance		Son		10101 Stephens Court, Ft. Smith, AR 72908		
16a METHOD OF DISPOSITION <input checked="" type="checkbox"/> Burial <input type="checkbox"/> Cremation <input type="checkbox"/> Donation <input type="checkbox"/> Entombment <input type="checkbox"/> Removal to State <input type="checkbox"/> Other (Specify)						
16b PLACE OF DISPOSITION (Name of cemetery, crematory, other place)			16c LOCATION - CITY, TOWN, AND STATE			
Pine Crest Cemetery			Mobile, Alabama			
17a EMBALMER'S NAME <input type="checkbox"/> Not Embalmed		17b EMBALMER'S LICENSE #	17c SIGNATURE (Professional Embalmers Only - Print Name)			
Sean Rollans		1885	<i>James H. Adams</i>			
17d NAME AND COMPLETE ADDRESS OF FUNERAL FACILITY						17e LICENSE #
Edwards Funeral Home, 201 N. 12th, Fort Smith, Arkansas 72901						9
18a DATE PRONOUNCED DEAD (month/day/year)		18b TIME PRONOUNCED DEAD		18c NAME AND TITLE OF PERSON PRONOUNCING DEATH (Print/Type)		18d WAS MEDICAL EXAMINER OR CORONER CONTACTED?
Jan. 31, 2009		4:47 <input type="checkbox"/> AM <input type="checkbox"/> PM		Phyllis Lacquement, RN		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
20 PART I - Enter the (check of events)—diseases, injuries, or complications—that directly caused the death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the process. DO NOT ABBREVIATE. Enter only one cause on a line.						
IMMEDIATE CAUSE (if and when in condition existing at death)		Pneumonia with Aspiration				APPROXIMATE INTERVAL (Days to Death)
Secondary to conditions, if any, leading to the cause		immobility				10-14 days
UNDERLYING CAUSE (list all the causes leading to death LAST)		pelvic fracture				2 of days
		Trauma (due to fall on patient)				2 of days
PART II - Enter other significant conditions that existed but not resulting in the underlying cause given in PART I						21a WAS AN AUTOPSY PERFORMED?
						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
21b WERE AUTOPSY FINDINGS AVAILABLE TO COMPLETE THE CAUSE OF DEATH?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22 MANNER OF DEATH <input type="checkbox"/> Natural <input checked="" type="checkbox"/> Accidents <input type="checkbox"/> Suicide <input type="checkbox"/> Homicide <input type="checkbox"/> Pending investigation <input type="checkbox"/> Could not be determined						
23 DID TOBACCO USE CONTRIBUTE TO DEATH?		24 IF FEMALE				
<input type="checkbox"/> Yes <input type="checkbox"/> Probably <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown		<input type="checkbox"/> Not pregnant within past year <input type="checkbox"/> Not pregnant, but pregnant within 42 days of death <input type="checkbox"/> Unknown if pregnant within last year <input type="checkbox"/> Pregnant at time of death <input type="checkbox"/> Not pregnant, but pregnant 43 days to 1 year before death				
25a DATE OF INJURY (month/day/year)	25b TIME OF INJURY (AM/PM)	25c PLACE OF INJURY (if a Dweller's home, specify city, railroad, wooded, and street field)			25d INJURY AT WORK?	
1/31/09	6:15	Street field Assisted Living			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
25e LOCATION OF INJURY (Home, Street Apartment, City, State, Zip Code)						
2500 Fianna Oaks Drive Ft Smith, AR 72908						
25f DESCRIBE HOW INJURY OCCURRED						25g IF TRANSPORTATION INJURY, SPECIFY
Dad fell on patient, causing his pelvic fracture						<input type="checkbox"/> Driver/Operator <input type="checkbox"/> Passenger <input type="checkbox"/> Pedestrian <input type="checkbox"/> Other (Specify)
26a CERTIFIER (check only one)						
<input checked="" type="checkbox"/> Certifying Physician - To the best of my knowledge, death occurred due to the cause(s) and manner stated						
<input type="checkbox"/> Pronouncing & Certifying Physician - To the best of my knowledge, death occurred at the time, date, and place, and due to the cause(s) and manner stated						
<input type="checkbox"/> Medical Examiner - On the basis of examination, and/or investigation, in my opinion, death occurred at the time, date, and place, and due to the cause(s) and manner stated						
<input type="checkbox"/> Coroner - On the basis of examination, and/or investigation, in my opinion, death occurred at the time, date, and place, and due to the cause(s) and manner stated						
<input type="checkbox"/> Hospital Registered Nurse - To the best of my knowledge, death occurred due to the cause(s) and manner stated						
SIGNATURE <i>James H. Adams</i> TITLE <i>MD</i> DATE <i>2/1/09</i> (DATE)						
26b NAME AND COMPLETE MAILING ADDRESS OF PERSON SIGNING ITEM 26a (if different)						26c LICENSE #
James H. Adams, MD 1500 Robson Ft Smith, AR 72908						C6617
27a TYPE OF REGISTRATION						27b FOR REGISTRATION DATE (month/day/year)
Christina Howell DR						Feb 13, 2009

THIS IS TO CERTIFY THAT THE ABOVE IS A TRUE AND CORRECT COPY OF THE CERTIFICATE ON FILE IN THE ARKANSAS DEPARTMENT OF HEALTH.



FEB 13 2009

*Michael A. Adams*  
Michael A. Adams  
State Registrar

WARNING: A REPRODUCTION OF THE EMBOSSED SEAL OF THE STATE OF ARKANSAS IS ILLEGAL TO ALTER OR COUNTERFEIT



DO NOT ACCEPT UNLESS THIS IS PRESENT IT IS ILLEGAL TO

1869325

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