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November 2, 2026

Kristi Onstot
Executive Secretary
Executive Council
State Capitol
LOCAL

Re: Retention of Special Counsel - NuDak Ventures, LLC d/b/a NuCara Bankruptcy Proceedings

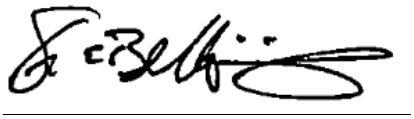
Dear Ms. Onstot:

The Attorney General has reviewed the request from the Iowa Department of Health and Human Services (HHS) to retain special counsel, Ciardi Ciardi & Astin, to represent the State in Bankruptcy Court in Delaware involving NuDak Ventures, LLC d/b/a NuCara.

Albert A. Ciardi III, Managing Partner of Ciardi Ciardi & Astin will be lead attorney representing the State in this matter. Mr. Ciardi charges a rate of $500/hour and Sonali Doshi, Associate, charges a rate of $350/hour. These are discounted rates compared to the regular rates the firm charges ($700 for Managing Partner and $400 for Associates). Our office has previously retained Mr. Ciardi to assist in other bankruptcy matters and has been pleased with the work he has done on behalf of the State.

Our office supports HHS's proposal and believes it would advance the office's ability to handle this litigation and continue providing services to its other clients. The attorney and vendor rates proposed are commercially reasonable and appropriate for litigation of this scope, and this office has previous experience with the firm.

Yours truly,



Steve Blankinship
Chief Deputy Attorney General

IOWA | Health and Human Services

September 25, 2026

Kristi Onstot, Executive Secretary
Executive Council
State Capitol
Des Moines, Iowa 50319

Re: Request for Special Counsel – NuDak Ventures, LLC d/b/a NuCara Bankruptcy Proceedings

Dear Ms. Onstot:

The Iowa Department of Health and Human Services (HHS) respectfully requests that the Executive Council authorize the appointment of special counsel to represent the State's interests in the ongoing bankruptcy proceedings involving NuDak Ventures, LLC d/b/a NuCara. The State filed suit against NuDak Ventures, LLC in Polk County on March 6, 2026, for claims including breach of contract and improper expenditure of HIV and STI program income, arising from funds owed to the Department. NuDak Ventures, LLC has subsequently filed for bankruptcy in Delaware, where the Attorney General's Office has advised that there appear to be assets available for distribution to creditors. The Attorney General's Office recommended that HHS pursue a proof of claim to preserve the State's ability to potentially recover funds and advised that specialized outside bankruptcy counsel licensed to practice law in Delaware is necessary to appropriately evaluate and pursue the State's claim. The Attorney General's Office identified outside bankruptcy counsel it has relied upon previously and who has experience handling bankruptcy matters in Delaware. The Attorney General's Office recommends that this counsel preliminarily reviews the bankruptcy court record and the circumstances surrounding HHS's potential claim. The initial scope of work would include assessing the State's likelihood of recovering funds, evaluating the assets that may be available for distribution to creditors, advising HHS and the Attorney General's Office regarding the State's position in the bankruptcy proceedings, and providing an estimate of the legal fees that would be required to pursue the matter, including preparation and filing of a proof of claim as appropriate. This initial assessment will allow HHS and the Attorney General's Office to make an informed decision regarding the appropriate level of continued legal action based on potential recovery and anticipated cost of representation.
For these reasons, HHS respectfully requests that the Executive Council authorize the Attorney General's Office to retain special counsel with the necessary bankruptcy expertise to represent the State's interests in connection with the NuDak Ventures, LLC d/b/a NuCara bankruptcy proceedings. HHS has funds available to pay the costs associated with special counsel and proposes that those costs be paid from state general funds that support the HIV and STI program.

HHS appreciates the Executive Council's consideration of this request. Please contact me if additional information will be helpful.

Sincerely,

Larry Johnson
Principal Deputy Director
Iowa Department of Health and Human Services