

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:

**MIDWEST CHRISTIAN VILLAGES, INC.
et al.,¹**

Debtors.

Chapter 11

Case No. 24-42473-659

Jointly Administered

Related Docket Nos. 8, 101, 229,
372, 413, 499, 542 and 572

**NOTICE OF FILING SEVENTH SELF-REPORTING AFFIDAVIT IN LIEU OF
APPOINTMENT OF PATIENT CARE OMBUDSMAN**

PLEASE TAKE NOTICE THAT on July 16, 2024, the Debtors filed the *Motion for Entry of an Order, Pursuant to § 333(A) of the Bankruptcy Code and Bankruptcy Rule 2007.2, (I) Waiving the Appointment of a Patient Care Ombudsman and (II) Allowing the Debtors to Self Report* (the "Motion") [Docket No. 8].

PLEASE TAKE FURTHER NOTICE that on July 29, 2024, the Court entered the *Order Pursuant to Section 333(a) of the Bankruptcy Code and Bankruptcy Rule 2007.2 (I) Waiving Without Prejudice the Appointment of a Patient Care Ombudsman and (II) Allowing the Debtors*

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141-7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice, LLC [6886], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].



to *Self Report* (“Order”)² [Docket No. 101], which excused the appointment of a patient care ombudsman and required the Debtors to self-report.

PLEASE TAKE FURTHER NOTICE, that pursuant to the terms set forth in the Order, the Debtors hereby file the *Seventh Affidavit of Shawn O’Conner in Lieu of Appointment of a Patient Care Ombudsman*, attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE, that Debtors will provide a copy of this notice to: (a) the U.S. Trustee, (b) the Unsecured Creditors Committee, (c) any Residents or family members thereof who specifically request a copy of such affidavit or report, and (d) any state supervising authorities. Moreover, the Self-Reports will also be available on the website of Debtors’ noticing and claims agent, Verita Global, at <http://www.veritaglobal.net/MCV>, or by accessing the Court’s website at www.moeb.uscourts.gov. A PACER password is needed to access documents on the Court’s website.

Dated: February 27, 2025
St. Louis, Missouri

Respectfully submitted,

DENTONS US LLP

/s/ Stephen O’Brien

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² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion or the Order, as applicable.

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EXHIBIT A

**Seventh Affidavit of Shawn O'Conner in Lieu of Appointment of a
Patient Care Ombudsman**

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC.
et al.,¹

Debtors.

Chapter 11

Case No. 24-42473-659

Jointly Administered

Related Docket Nos. 8, 101, 229,
372, 413, 499, 542 and 572

NOTICE OF SEVENTH SELF-REPORT

I, Shawn O’Conner, hereby state and declare as follows:

1. I am over the age of twenty-one years old, have personal knowledge of the facts hereinafter set forth, and am fully competent to testify.

2. I am a Managing Director with Healthcare Management Partners, LLC and serve as the CRO to the Debtors in these chapter 11 cases.

3. The information included as **Exhibit 1**, attached and incorporated to this Affidavit, is responsive to the *Order Pursuant to Section 333(a) of the Bankruptcy Code and Bankruptcy Rule 2007.2 (I) Waiving Without Prejudice the Appointment of a Patient Care Ombudsman and (II) Allowing the Debtors to Self Report (“Order”)* [Docket No. 101], entered on July 29, 2024,

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141-7390. The last four digits of the Debtors’ federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice, LLC [6886], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886] [filed on August 21, 2024].

which excused the appointment of a patient care ombudsman and required the Debtors to self-report. The information presented in **Exhibit 1** covers the period from January 1, 2025 through January 31, 2025. I have examined the information and affirm that the information is true and correct to the best of my personal knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: February 27, 2025
St. Louis, Missouri

/s/ Shawn O'Conner
Shawn O'Conner
Healthcare Management Partners, LLC

Exhibit 1

**DEBTORS' SEVENTH SELF REPORT IN LIEU OF APPOINTMENT OF A PATIENT
CARE OMBUDSMAN FOR THE REPORTING PERIOD**

Exhibit 1

- With respect to “Staff Members” (including W-2 employees or independent contractors, who are directly contracted with or by the Debtors, and individuals who, at the request of the Debtors, whether or not directly contracted with, provide any form of care to the Residents.), I report, for the period of January 1 through and including January 31, 2025:

a. Staff Numbers:

| <u>Position</u> | <u>Count</u> |
|-------------------------------|--------------|
| Accountant | 5 |
| Administrator | 12 |
| Admission | 1 |
| Assistant Director of Nursing | 2 |
| Chaplain | 7 |
| CNA | 481 |
| Culinary | 110 |
| Culinary Manager | 6 |
| Director | 25 |
| Director of Nursing | 7 |
| Driver | 7 |
| Executive | 5 |
| Executive Assistant | 3 |
| Facility Support | 73 |
| Human Resources | 13 |
| Laundry | 12 |
| LPN | 256 |
| LPN Manager | 12 |
| Medication Aide | 46 |
| Manager | 18 |
| Office Support | 52 |
| Pharmacist | 4 |
| Pharmacy Tech | 10 |
| RN | 86 |
| RN Manager | 12 |
| Scheduler | 5 |
| Supportive Aide | 41 |
| Supervisor | 12 |
| Social Worker | 3 |
| Transportation Aide | 10 |
| Wellness | 25 |
| SLP | 12 |
| COTA | 10 |
| OT | 15 |
| PT | 10 |
| PTA | 15 |
| Therapy Wellness | 5 |

- With respect to “Staff Members” and the status or standing of any licenses held by staff members, I report, for the period of January 1 through and including January 31, 2025:
 - a. Debtors, to the best of their knowledge, believe that all “Staff Members” licenses are active with no disciplinary actions pending.
- With respect to “Staff Members” and any formal complaints made by Residents or families of Residents concerning the type and level of care provided (“Care”) by the Staff Members at the Debtors’ facilities, I report, for the period of January 1 through and including January 31, 2025:
 - a. This question is answered in the section below with respect to any formal complaints made by Residents or families of Residents concerning the type and level of care provided (“Care”) by the Staff Members at the Debtors’ facilities.
- With respect to staffing changes and any material increase or decrease in the number of staff members, I report, for the period of January 1 through and including January 31, 2025:
 - a. No material changes for the reporting period.
- With respect to Patient/Resident Records: Report on the measures taken by the Debtors to continue securing Resident records at the facilities.
 - a. Electronic records are password protected with access restricted to those authorized. Paper records are kept locked in files in the medical records office with access limited to authorized personnel.
- With respect to any formal complaints made by vendors raised by the Debtors’ vendors regarding payment or ordering issues, I report for the period of January 1 through and including January 31, 2025:
 - a. No formal vendor complaints during the period.
- With respect to any formal complaints made by Residents or families of Residents concerning the type and level of care provided (Care) by the Staff Members at the Debtors’ facilities, I report, for the period of January 1 through and including January 31, 2025:
 - a. Survey Activity:
 - i. Crown Point Christian Village:
 - 1. The community received approval of their plan of correction on 1/21/2025 and the community is in substantial compliance.
 - ii. Lewis Memorial Christian Village:
 - 1. An unannounced complaint survey was conducted by the regulatory agency on January 2, 2025 related to improper care and staffing. The complaint was invalid and no findings. The community is in substantial compliance.
 - iii. Risen Son Christian Village:
 - 1. An annual recertification survey occurred from January 6, 2025, through January 9, 2025. Community submitted all appropriate documents and plan of correction with a date certain of January 31, 2025.
 - iv. Wabash Cristian Village:

1. Annual elevator inspection occurred on January 22, 2025. No concerns identified.

b. Grievances:

i. Crown Point Christian Village:

1. Resident expressed a concern with an odor in the shower room on January 7, 2025. The room was deep cleaned and new strips placed on the floor. Resident was satisfied with the resolution.
2. Family member expressed a concern that their mother didn't have a good experience over the weekend on January 6, 2025. Licensed Nursing Home Administrator met with the resident and family member to address any concern. No further concerns noted.
3. Resident expressed a concern with clothing missing on January 8, 2025. The clothing was located and returned to the resident with no further concerns.
4. Family member of a resident expressed a concern with the resident's wound not healing on January 10, 2025. The wound physician contacted the daughter and educated them on the treatment process and no further concerns.
5. Family member expressed a concern with her mother not getting a shower and her foley catheter not being emptied on January 12, 2025. Resident's shower was given and foley catheter emptied. Resident and daughter satisfied with the resolution.
6. Resident expressed a concern with care on January 11, 2025. The Licensed Nursing Home Administrator met with the resident and addressed the resident's care concerns and preferences.
7. Resident expressed a worry that they may get sick by sharing a bathroom with a COVID positive resident on January 11, 2025. Nurse manager followed up with resident. Staff were educated on cross contamination prevention, donning and doffing of PPE, and resident was satisfied with resolution.
8. Resident reported their comforter and sheet was missing on January 17, 2025. These items were located in the laundry and no further concerns.
9. Resident expressed a desire to update their food preferences due to Chrons Disease on January 20, 2025. Dietary staff met with the resident and updated their food preferences.
10. Resident expressed a concern with their room cleanliness on January 20, 2025. The room was cleaned that day and no further concerns.
11. Resident reported a blanket was missing on January 20, 2025. The blanket as located, labeled for the resident, and concern was addressed.

12. Resident's family member expressed a concern that males are allowed on the same unit as their mother, a concern with cleanliness, and requested a sign be placed on her mother's door on January 21, 2025. The daughter was educated that we care for all sexes. The unit was cleaned by housekeeping staff and a sign was placed on the resident's door.
 13. Resident reported a bag of candy missing on January 21, 2025. The candy was located in the resident's room.
 14. Resident expressed a concern with her meal ticket and delivery on January 23, 2025. This was addressed and no further concerns.
- ii. Hoosier Christian Village
1. Resident medications were left at bedside on January 7, 2025. The attending nurse was educated and concern resolved.
 2. Resident's family member expressed a concern with timely notification upon a hospital transfer on January 15, 2025. Licensed Nursing Home Administrator educated all associates on providing timely notification and no further concerns.
 3. Resident expressed a concern that an associate completed a transfer without a gait belt on January 15, 2025. The associate was educated and no further concerns.
 4. Resident expressed a concern with their shower not given on January 17, 2025. Shower was given and no further concerns.
- iii. Hickory Point Christian Village:
1. Resident expressed a concern with wanting more therapy on January 10, 2025. Therapy manager met with the resident and no further concerns.
 2. Family member expressed concerns that resident had a fall on January 20, 2025. Director of Nursing met with the family and no further concerns.
 3. Resident expressed a concern with not being repositioned as often as they wish. Staff educated on resident care preferences and care plan updated.
 4. Resident expressed a concern with their shower days on January 24, 2025. The Director of Nursing met with the resident and no further concerns.
- iv. Lewis Memorial Christian Village:
1. Resident's POA expressed a concern regarding laundry and newly purchased cardigans were not put away properly on January 16, 2025. Housekeeping Supervisor worked with the family to create more storage space and no further concerns.
- v. Risen Son Christian Village:

1. Resident expressed a concern with the shower schedule on January 6, 2025. Community worked with the resident, family, and Hospice to coordinate a new schedule. No further concerns.
 2. Resident was unhappy with associates encouraging her to eat her meal in the dining room on January 14, 2025. Resident was advised she can eat alone in her room and staff would just provide daily check-ins.
 3. Resident requested to leave against medical advice on January 24, 2025 due to being on isolation precautions. Education was provided to the resident so they understood the need of precautions and a discharge plan was initiated.
- Litigation: Report any post-petition litigation or administrative actions initiated post-petition against the Debtors, and the status of any pending administrative actions against the Debtors. I report for the period of January 1 through and including January 31, 2025:
 - a. Lewis Memorial Christian Village:
 - i. Marshall IDHR/EEOC Claim: Provided a supplemental statement
 - b. River Birch Christian Living:
 - i. Lovelace IDHR Claim: Provided a supplemental statement
 - Expansion/Closures: Report any plans to open or close any part of the Debtors' facilities.
 - a. There are no plans to open or close any part of the Debtors' communities; however, we want to acknowledge that significant changes have taken place in our network of communities. As of now, several of our communities have been divested and transitioned to new owners or management teams. Specifically, Lewis Memorial Christian Village, River Birch Christian Living, Hickory Point Christian Village, The Christian Village, and Hoosier Christian Village have all undergone this process. Additionally, Wabash Estates, Washington Estates, and Wabash Apartments are currently under interim management agreements with Chapters Senior Living pending the HUD assumption and IHDA closing. In addition, the Crown Point Christian Village is expected to close on 2/28/25 with operations transferring on 3/1/25. Please note the following dates and developments regarding our communities:
 - i. Lewis Memorial Christian Village was divested and transitioned on 2/1/25.
 - ii. River Birch Christian Living was divested and transitioned on 2/1/25.
 - iii. Hickory Point Christian Village was divested and transitioned on 2/1/25.
 - iv. The Christian Village was divested and transitioned on 2/1/25.
 - v. Risen Son Christian Village was divested and transitioned on 2/6/25.
 - vi. Spring River Christian Village was divested and transitioned on 2/6/25.
 - vii. Wabash Estates was placed under an Interim Management Agreement with Chapters Senior Living on 2/6/25.
 - viii. Washington Estates was placed under an Interim Management Agreement with Chapters Senior Living on 2/6/25.

- ix. Wabash Apartments was placed under an Interim Management Agreement with Chapters Senior Living on 2/6/25.
 - x. Hoosier Christian Village was divested and transitioned on 2/20/25.
 - xi. Crown Point Christian Village is scheduled to be divested on 2/28/2025, with change of control occurring on 3/1/2025.
- With respect to the Condition of Facilities noted herein, are each being addressed on a go-forward basis. I report for the period of January 1 through and including January 31, 2025:
 - a. Risen Son Christian Village:
 - i. Existed as of the time of filing. They are being noted in this report because the issues have not been fully resolved yet and in the interest of full disclosure. Wastewater Treatment Plant is treated by an onsite wastewater treatment plant. The wastewater treatment plant is currently not in compliance with Iowa Department of Natural Resources (IDNR) regulations. Immediate repairs are needed to make this plant operate within regulations and the civil engineer has estimated the cost of these repairs to be \$60,000.00. The civil engineer has prepared plans for a lift station and force main that would connect the community to the Council Bluffs municipal sewer system. These plans have been submitted to both IDNR and to Council Bluffs, with approvals to proceed received. The engineer has estimated the cost of this work at \$1,500,000.00. The engineer has also estimated the cost to replace the existing wastewater treatment plant with a package system at \$3,000,000.00.
 - b. Crown Point Christian Village:
 - i. Existed as of the time of filing. They are being noted in this report because the issues have not been fully resolved yet and in the interest of full disclosure. HVAC Repairs is needed in the main building which is a loop system and fin-tube radiators in each room. Air handling units are installed in the larger areas (dining, corridors, nursing stations, etc.). These air handlers are also connected to the loop system. The Debtor is leasing a temporary chiller each month to ensure the HVAC operates appropriately.
 - ii. Existed as of the time of filing. They are being noted in this report because the issues have not been fully resolved yet and in the interest of full disclosure. Wastewater Treatment plant is currently treated by an on-site wastewater treatment plant, which is currently in compliance with the Indiana Department of Environmental Management. The Town of Winfield and Indiana Department of Environmental Management have requested the plant be connected to the Winfield Municipal Sewer System. Civil Engineers' estimated cost is \$500,000.00.
 - iii. On January 30, 2025 the community replaced a 120V 20Amp circuit for the air handler. Repair was \$3989.
 - c. Lewis Memorial Christian Village:

- i. Existed as of the time of filing. They are being noted in this report because the issues have not been fully resolved yet and in the interest of full disclosure. The roof of the skilled nursing building is a membrane roof that was not installed correctly and never adhered to the roof deck. Temporary steps have been implemented to prevent or minimize leaking during heavy storms.
 - ii. Roofing concerns were identified and corrected on January 21, 2025. Universal Roofing removed TPO roof around 10 drains, installed 10 - 4" drain flashings, install new TPO roof around drains, seal and weld new materials to old. Project cost was \$6,576.
 - d. The Christian Village (Lincoln, IL):
 - i. The main heating element needed replacement in January 2025. Total cost for the repair was \$7,800.00.
 - e. River Birch Christian Village:
 - i. Existed as of the time of filing. They are being noted in this report because the issues have not been fully resolved yet and in the interest of full disclosure. The unoccupied northern building (4008 Cockrell Lane) suffered severe internal water damage from a sprinkler pipe break in January 2022. Much of the interior has been gutted but reconstruction has never begun.
- With respect to Life-Safety Issues, I report, for the period of January 1 through and including January 31, 2025:
 - a. River Birch Christian Village:
 - i. Fire Marshall visit on January 21, 2025. The visit resulted in a recommendation to prevent outside gates from latching. The gates were adjusted and no longer latch.