

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § CASE NO. 24-34908
§
GLOBAL WOUND CARE MEDICAL § CHAPTER 11
GROUP, a Professional Corporation,1 §
§
DEBTOR §

NOTICE OF APPOINTMENT OF
PATIENT CARE OMBUDSMAN UNDER 11 U.S.C. § 333

TO: TO THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE:

Kevin M. Epstein, the United States Trustee for the Southern District of Texas, by and through his undersigned counsel, hereby appoints Suzanne Richards, whose contact information is SMR Healthcare Management, Inc., 4525 Dean Martin Drive, Unit 2308, Las Vegas, Nevada 89103, (714) 290-6226, suzanne@smrhealth.com as the Patient Care Ombudsman (“PCO”) pursuant to Fed. R. Bankr. P. 2007.2(c) and the Order requiring the appointment at ECF No. 1. The appointee’s verified statement pursuant to Fed. R. Bankr. P. 2007.2(c) is attached as **Exhibit**

1.

Section 333(b) of the Bankruptcy Code provides that the PCO shall:

- (1) monitor the quality of patient care provided to patients of the debtor, to the extent necessary under the circumstances, including interviewing patients and physicians;
- (2) not later than 60 days after the date of this appointment, and not less frequently than at 60-day intervals thereafter, report to the court after notice to the parties in interest, at a hearing or in writing, regarding the quality of patient care provided to patients of the debtor; and
- (3) if such ombudsman determines that the quality of patient care provided to patients of the debtor is declining significantly or is otherwise being materially compromised, file with the court a motion or a written report,

1 The last four digits of the Debtor’s tax identification number is 3572.



with notice to the parties in interest immediately upon making such determination; and

Section 333(c) of the Bankruptcy Code provides further that:

(1) An ombudsman appointed under section 333(a) of the Bankruptcy Code shall maintain any information obtained by such ombudsman under section 333 of the Bankruptcy Code that relates to patients (including information relating to patient records) as confidential information. Such ombudsman may not review confidential patient records unless the court approves such review in advance and imposes restrictions on such ombudsman to protect the confidentiality of such records.

Pursuant to Fed. R. Bankr. P. 2015.1:

(a) Reports.

Unless the court orders otherwise, a patient care ombudsman, at least 14 days before making a report under § 333(b)(2) of the Code, shall give notice that the report will be made to the court, unless the court orders otherwise. The notice shall be transmitted to the United States Trustee, posted conspicuously at the health care facility that is the subject of the report, and served on the debtor, all patients, and any committee elected under § 705 or appointed under § 1102 of the Code or its authorized agent, or, if the case is chapter 11 reorganization case and no committee of unsecured creditors has been appointed under § 1102, on the creditors included on the list filed under Rule 1007(d), and such other entities as the court may direct. The notice shall state the date and time when the report will be made, the manner in which the report will be made, and, if the report is in writing, the name, address, telephone number, email address, and website, if any, of the person from whom a copy of the report may be obtained at the debtor's expense.

(b) Authorization to Review Confidential Patient Records.

A motion for the health care ombudsman under § 333(c) to review confidential patient records shall be governed by Rule 9014, served on the patient and any family member or other contact person whose name and address has been given to the debtor for the purpose of providing information regarding the patient's health care, and transmitted to the United States Trustee subject to applicable nonbankruptcy law relating to patient privacy. Unless the court orders otherwise, a hearing on the motion may be commenced no earlier than 14 days after service of the motion.

The PCO will keep contemporaneous records of time and expenses in tenths (.1) hour increments and bill the estate at no more than \$350 per hour for services rendered, \$175 per hour for travel time, and for reimbursement of actual and necessary expenses; and the PCO may, if

necessary and only upon application to the Court, hire legal counsel to represent her in this case.

Dated: November 4, 2024,

Respectfully submitted,

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
for the Southern and Western Districts of
Texas

/s/ Ha M. Nguyen
Ha Nguyen, Trial Attorney
CA Bar #305411
FED ID NO. 3623593
United States Department of Justice
Office of the United States Trustee
515 Rusk Street, Suite 3516
Houston, Texas 77002
E-mail: Ha.Nguyen@usdoj.gov
Cell: 202-590-7962

Certificate of Service

A copy of the foregoing was filed and served by electronic means to all parties requesting notice via ECF on or about the 4th of November 2024.

/s/ Ha M. Nguyen
Ha M. Nguyen

**VERIFIED STATEMENT AND AFFIDAVIT OF DISINTEREST
SUZANNE RICHARDS**

I hereby verify that I have no connections with the above-captioned debtors, creditors, other parties in interest, and their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee except as follows:

I have interacted with Mr. Samuel Maizel, Esq. in my professional career and as a panel member at the American Bankruptcy Institution conference in November 2022.

I am a duly licensed RN in the State of California. My office is located at SMR Healthcare Management, Inc., 4525 Dean Martin Drive, Unit 2308, Las Vegas, Nevada 89103. My message telephone number is (714) 290-6226.

I am a person eligible and competent to perform the duties as a PCO in the above-captioned case pursuant to 11 U.S.C. § 333. My qualifications to perform the required functions of a Patient Care Ombudsman in this case are evidenced by my Curriculum Vitae, attached hereto as Exhibit A.



Suzanne Richards

SUZANNE RICHARDS, MBA, FACHE
RN, BSN, MPH, CPHQ, CHP, CHQCM, FAIHQ, FABQAURP
714-290-6226
SuzanneRichards94@gmail.com

**System Healthcare CEO; Hospital CEO; Chief Clinical Officer;
Accreditation/Regulation/Turn-Around/Standardization Consultant providing leadership
in all areas of healthcare; Patient Care Ombudsman; Entrepreneur**

ENTREPRENEURSHIP

- West Coast Journey Investments, LLC 9-2024 to present
- Chief Executive Officer
 - Owner/Investor/Operator
 - Placentia Surgery Center
 - Center of Outpatient Surgery
- Eloquent Senior Care, Inc 3-2020 to present
- Chief Executive Officer
 - Owner/Operator
 - ACASA Senior Care (Home Care Agency) Orange County, California—License #304700307, expires 10/2026
 - ACASA Senior Care (Home Care Agency) Las Vegas, Nevada—License 11360-PCS-0, expires 1/2026
- SMR Healthcare Management, Las Vegas Nevada 10-2018 to present
- CEO
 - Owner/Consultant
 - Healthcare Consultant; Expert Witness; Interim CEO
 - Call Center for social determinants of health contracted with Partners in Care in California, GroundGame in all other 49 states.
 - Paladin Management Subcontractor for bankrupt or distressed healthcare entities
 - ProNexius Affiliate for consulting
 - Ambulatory Practice Leader

EXPERIENCE

- California State University, Long Beach, California 8-2020 to present
- Instructor Healthcare Administration Graduate Program
 - HCA 530: Strategy Planning and Digital Marketing for Healthcare (Fall Course)
 - HCA 528: Population Health Management (Spring Course)
 - Chapter Author Managing the Long Term Care Facility: Practical Approaches to Providing Quality Care, 2nd Edition. Chapter 17.

KPC Global Management, Hospital System, Santa Ana, CA <i>(time period employed in various roles)</i>	10-2015 to 12-2018
<ul style="list-style-type: none"> • Senior Advisor to Owner • System Chief Executive Officer (7 acute care facilities comprising 1,275-beds in three counties in Southern California) 	7-2018 to 12-2018 10-2015 to 12-2018
Orange County Global Medical Center	4-2014 to 7-2018
<ul style="list-style-type: none"> • Chief Executive Officer Level 2 Trauma Center Open Heart Program Comprehensive Stroke Receiving Center <i>(Formerly known as Western Medical Center Santa Ana)</i> 	
Victor Valley Global Medical Center, Victorville, CA	8-2017 to 7-2018
<ul style="list-style-type: none"> • Chief Executive Officer 	& 11- 2012 to 9-2016
Prime Healthcare, Ontario, California <i>(time period employed in various roles)</i>	2003 to 2012
<ul style="list-style-type: none"> • Corporate Chief Clinical Officer Active role in transition and clinical management of eighteen facilities throughout the United States (16 For Profit; 2 Not-For-Profit). Fourteen Acute Care facilities in California; one acute care facility in Texas; and one acute care facility in Pennsylvania. 	12-2005 to 8-2012
Chino Valley Medical Center Nursing Administration	2-2003 to 12-2005
The Joint Commission, Oakbrook, Illinois	2005 to 2007 & 2010 to 2012
<ul style="list-style-type: none"> • Acute Care Hospital Administrative and/or Nursing Surveyor. Functioned in Team Leader role for triennial surveys and Periodic Performance Reviews. Resigned in 2007 due to commitment to Prime Healthcare Management; reinstated October 2010 as Bench Surveyor 	
Warner Brothers’ Studios—Medcor	2004-2007
<ul style="list-style-type: none"> • contracted set medic, occupational health nurse and technical advisor for film and TV 	
EPIC Resources, Inc., Chino Hills, CA	2002 to 2005
<ul style="list-style-type: none"> • Principal; Consultant 	
Tustin Hospital and Medical Center, Tustin, CA	2001 to 2002
<ul style="list-style-type: none"> • Chief Executive Officer Responsible for the day-to-day operations of a 177-bed facility. • Chief Operating Officer/ Chief Nurse Officer (Bellflower MC—sister facility) Responsible for the day-to-day operations of a 144-bed facility. 	

- Pinnacle Health Resources, Irvine, CA 2000-2001
- Director IPA Operations
Responsible for the operations of a physician owned IPA to include negotiating health plan contracts, negotiating physician contracts, and working on relationships with hospitals, DME and home health providers.
- SCAN/SmartCare Health Plan 1996 - 1997
- Medical Services Specialist/ Medical Case Manager
- CalOPTIMA 1995 - 1996
- Medical Quality Management Coordinator
- ConCorde Career Institute 1995 -1996
- LVN Clinical Instructor
- Friendly Hills HealthCare Network 1993 -1995
- Biostatistician
- Martin Luther Hospital Anaheim 1990-1999
- Director of Case, Quality and Infection Control Management (8/97 to 11/99)—*facility closed after purchased from Memorial Health System*
 - Float Nurse—Casual Employee Status (5/96 to 8/97)—weekend work
 - Intensive Care Staff Nurse (7/91 to 5/96)—per diem and weekend work
 - Post Partum Night Charge Nurse (7/90 to 7/91)
- Fountain Valley Hospital 1989-1990
- Surgical Floor Staff Nurse

EDUCATION

Master Degree in Business Administration (MBA),
University of Irvine, Graduate School of Management, Healthcare Emphasis

Master of Public Health, Epidemiology and Biostatistics (MPH)
Loma Linda University, Loma Linda, California

Bachelor of Science, Nursing (BSN)
California State University, Fullerton, California

Associate Degree, Nursing (ADN)
Cypress College, Cypress, California

LICENSE AND CERTIFICATIONS

Registered Nurse License, California, Issued 1989 expires 9/2025
Continuing Education Provider License, California, Board of Registered Nurses exp 4/2025
Public Health Nurse License, California, Board of Registered Nurses, issue date 8/18/1992, expires 9/2025
Certified Professional in HealthCare Quality (CPHQ 1997- present) #7262
Board Certified Diplomat with the American Board of Quality Assurance and Utilization Review Physicians (CHCQM 2002- present) #70154
Diplomat with the American College of HealthCare Executives (CHE 2002- present)
Fellow with the American College of HealthCare Executives (FACHE 2009- present)
Fellow of the American Institute for Healthcare Quality (FAIHQ 2008- present)
Fellow of the American Board of Quality Assurance & Utilization Review Physicians (FABQAURP 2013- present)
Certified HIPAA Professional with the HIPAA Academy (CHP 2012- present) #HIO 201-001723

AWARDS AND HONORS

February 14, 2019, CalOPTIMA ROCK Appreciation Award, CalOPTIMA
May 2018, OC 500 Women in Business Honoree, Orange County Business Journal
August 2017, Health Innovator Award, American Career College and West Coast College
May 2017, Top 5 Women in Business, Orange County Business Journal, out of 201 nominees
May 2017, OC 500, Women in Business, Orange County Business Journal
May 2016, OC 500, Healthcare, Orange County Business Journal
June 2013, Approved for Membership in the CSUF Nursing Honor Society
June 2000, Best Team Player Classmate, UCI Healthcare MBA program, voted by entire class of 62

ADHOC COMMITTEE PARTICIPATION/NOTABLE CONSULTING

County of Orange, EMS (consulting)

- o Charged with writing the Alternative Care Site Plan for Orange County during COVID March 2020 to 2021

Quorum (consulting)

- o Interim CEO of Barstow during surge crisis during covid 2020 to 2021

County of Orange, Supervisors Bartlett and Do—Behavioral Health Crisis Ad Hoc, 2016

- o Committee comprised of two acute care hospital representatives, police, paramedic, juvenile court, physician and county to come up with solutions for the behavioral health crisis in OC
- o Hospital Association of California, MediCal Taskforce—Orange County Representative, 2016-2017
- o Committee comprised of hospital representatives from five counties, CEOs of MediCal Health Plans, HASC staff, physicians, community clinics and IPA constituents

CMC Committee for HASC 2014- 2017

CalOPTIMA Provider Advisory Committee

- o Hospital Representative, Board of Directors-Appointed, 10-2014 to 6-2018
Vice Chair 2016- 2018

California Hospital Association

- Healthcare Reform: Quality, Transparency and Value Work Group 2010- 2012
- Healthcare Reform: Accountable Care Organization (ACO) Work Group 2010-2012
- Healthcare Reform: Emergency/Trauma Work Group 2010- 2012

BOARD MEMBERSHIP

American University Health Services, Board of Trustee

Chair, 1-2018 - present

Member, 3/2017- present

Chair of Fundraising Committee

Vice Chair of Finance and Audit Committee

Cerenetex Advisory Board, Migraine Medical Device

Member, June 2018 – present

AKUA Behavioral Health, Board of Director

Member, January 2021- 2022

March of Dimes, LA Market

Member, February 2017- 2024

California Hospital Association

California System Integrated Council, Member, 2016- 2018

California Association of Hospitals and Health Systems, Member 2016- 2018

Hospital Quality Committee 2010- 2012

Joint Committee on Accreditation and Licensing 2010- 2012

Hospital Association of Southern California, Board of Directors

Executive Board Representative 12/2017-6/2018

Orange County Area Representative, 12/2014 to 12/2017

Area Chair, Orange County 2016

Private Essential Access Community Hospitals (PEACH)

Member, September 2016- 2018

March of Dimes Inland Empire, Board of Directors—consolidated into LA Market Board

Chair, 2014- 2017

March of Dimes Orange County, Board of Directors

Member 2015- 2016

American Heart Association Orange County, Board of Directors

Member, February 2017- 2018

Santa Ana Chamber, Board of Directors

Member, 2/2017- 2018

Anaheim Chamber, Board of Directors

Member, 2/2017- 2018

Victor Valley College Foundation

Fundraising and advocacy for the community college

Member, 7/2013- 2016

SPEAKING ENGAGEMENTS

Stanbridge University, Irvine, Panel—What Do Healthcare Leaders Look For While Hiring
American Bankruptcy Institute, Nashville, Panel Speaker--Hospitals: Medicare Reimbursement
Cuts, Rural Challenges and Beyond, November 2022
California State University, Long Beach, Upsilon Phi Delta Honor Society, Healthcare Career
Journey, February 4, 2020
California State University, Long Beach, Speaker for Healthcare Advisory Board, The Future of
Healthcare, December 6, 2019
George Mason University, Baltimore, Healthcare Trends, Healthcare CEO Panel, April 28, 2018
California State University, Fullerton, Healthcare Speaker to Future Healthcare Professionals,
April 27, 2018
American Career College, 4th Annual Summer Soiree, Key Note Speaker, August 11, 201
Santa Ana Community Leadership Forum, Healthcare Trends, June 16, 2017
AUHS Commencement Ceremony, Key Note Speaker, April, 2016
Orange County Christian Nurses Honor Society Induction Ceremony, December 12, 2015
Becker's Annual CEO Roundtable, November 19, 2015
Women in Leadership Forum, November 5, 2015
Connecting Women to Power, CA Board of Equalization, November 4, 2014
GOPAC National Legislative Conference, May 19, 2015
SeniorServ Hero Awards, Presenter, 2015
Becker's Annual CEO Roundtable, November 12, 2014
Victor Valley College Women's History Month Conference. Guest Speaker March, 2014
Military Officers Association of America. ObamaCare 101 Guest Speaker September 25, 2013
Healthcare Executive Association. Learning from Experience Hospital Turnaround. Speaker
December 12, 2013
Association for Healthcare Accreditation Professionals 6th Annual Conference, Speaker: General
Session: The drip factor: Turing data into actionable information. May 11, 2012

VOLUNTEER ACTIVITIES

American Heart Association OC Walk, Executive Committee Member, 2015, 2016, 2017
American Heart Association, Walk Chair, 2017—fundraising goal for 2017 is \$2.2M
Caterina's Club Advisory Board 2015, 2016, 2017—raising money to feed motel kids in Orange
County
Medical Explorer Posts, Advisor 2014- 2017
March of Dimes Walk for the High Desert, Chair, 2014 & 2015
 2014 Fundraising Chair Goal \$36K, raised \$119,000
 2015 Fundraising Chair Goal \$120,000, raised \$125,000
March of Dimes Inland Empire Signature Chef Chair, 2018, raised over \$750,000, highest funds
raised at this event. Raised enough money to make us for the shortfall of the LA and OC events.
March of Dimes LA Market Board +\$100,000 fundraiser 2018
President's Circle, Victor Valley College 2013 to 2016