

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC.  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. Case No. 24-42473-659  
(Joint Administration Requested)

Hearing Date: July 17, 2024  
Hearing Time: 2:00 p.m. (CT)  
Hearing Location: Courtroom 7 North

**MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS AUTHORIZING DEBTORS TO: (1) CONTINUE USING EXISTING CASH MANAGEMENT SYSTEM, BANK ACCOUNTS AND BUSINESS FORMS; (2) IMPLEMENT CHANGES TO THE CASH MANAGEMENT SYSTEM IN THE ORDINARY COURSE OF BUSINESS; (3) CONTINUE INTERCOMPANY TRANSACTIONS; (4) PROVIDE ADMINISTRATIVE EXPENSE PRIORITY FOR POSTPETITION INTERCOMPANY CLAIMS; AND (5) OBTAIN RELATED RELIEF**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) file this motion (this “**Bank Account Motion**”) for entry of interim and final orders, authorizing the Debtors, subject to the terms of any debtor-in-possession financing (“**DIP**”) and/or cash collateral agreement or order (each, a “**DIP Document**”), to: (1) continue to use their cash management system, including the continued maintenance of their existing bank accounts and business forms;

<sup>1</sup> 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] and (xxi) Shawnee Christian Nursing Center, LLC [0068].



(2) implement changes to their cash management system in the ordinary course of business, including opening new or closing existing bank accounts; (3) continue to perform under and honor intercompany transactions in the ordinary course of business, in their business judgment and in their sole discretion; (4) provide administrative expense priority for postpetition intercompany claims, (5) authorize the financial institutions at which the Debtors maintain various bank accounts to (a) continue to maintain, service and administer the Debtors' bank accounts, and (b) debit the bank accounts in the ordinary course of business on account of (i) wire transfers or checks drawn on the bank accounts, or (ii) undisputed service charges owed to the banks for maintenance of the Debtors' cash management system, if any, and (6) provide such other and further relief that may be just and proper.

### **Background**

1. On July 16, 2024 (the "**Petition Date**"), the Debtors filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code.
2. The Debtors continue in the operation and management of their business as debtors-in-possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.
3. No trustee, examiner or official committee has been appointed in these chapter 11 cases.
4. Simultaneously with the filing of this Motion, the Debtors filed the *Declaration of Kate Bertram in Support of the Debtors' Chapter 11 Petition and First Day Motions* (the "**First Day Declaration**"). As described in more detail in the First Day Declaration, the Debtors operate a mix of independent, assisted, and supportive living skilled nursing campuses in 10 locations across the Midwest, serving over 1,000 residents.

5. The Debtors filed Chapter 11 cases to pursue one or more going concern sales and/or going concern affiliates for each of their facilities.

### **Jurisdiction**

6. The United States Bankruptcy Court for the Eastern District of Missouri, Eastern Division (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

7. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

8. The statutory bases for the relief requested herein are §§ 105, 345, 363, 364, 503, 553, 1107, and 1108 of title 11 of the United States Code (the “**Bankruptcy Code**”)<sup>2</sup> Bankruptcy Rule 6003.

### **Relief Requested**

9. As described in the First Day Declaration, in the ordinary course of business, the Debtors utilize an integrated cash management system to collect, concentrate and disburse funds generated by their operations (the “**Cash Management System**”). In broad terms, the Debtors’ Cash Management System is similar to the cash management systems used by other large groups or systems of businesses. The Cash Management System is tailored to meet the Debtors’ operating needs as an operator of a large health system of senior care health facilities and related business entities. The Cash Management System enables the Debtors to efficiently collect and disburse cash generated by their business, pay their financial obligations, control and monitor funds and available cash at each entity, comply with the requirements of their financing agreements, reduce administrative expenses, and obtain accurate account balances and other financial data. It is critical

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<sup>2</sup> All references to § herein are to sections of the Bankruptcy Code. All references to “**Bankruptcy Rules**” are to provisions of the Federal Rules of Bankruptcy Procedure. All references to “**LBR**” are to provisions of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Missouri.

that the Cash Management System remain intact during these Chapter 11 cases to ensure seamless continuation of transactions and uninterrupted collection of revenues and disbursement of internal, intercompany and third-party obligations, and avoid irreparable harm to the Debtors' business and their patients.

10. The Cash Management System currently comprises approximately eighty-nine (89) accounts (the "Accounts"), listed on Exhibit A hereto, with fourteen (14) commercial banks, one (1) title company, one (1) senior care investment and asset management firm, and one (1) retirement financial advisory firm (collectively the "Banks").<sup>3</sup>

11. The Debtors request authority to continue utilizing the Accounts, subject to the terms of the DIP Documents. Requiring the Debtors to close certain of the Accounts and open new ones will disrupt the Debtors' cash flow – and, ultimately, impact resident/patient care – because (i) the depositors (some of which are governmental agencies) will not respond quickly to the change and will likely continue to send deposits to the original deposit account, and (ii) the Debtors have certain obligations including for payroll, payroll taxes, utilities property insurance premiums that they pay exclusively by electronic funds transfer and changes to the payment accounts have the potential of slowing down these crucial payments. Moreover, they maintain other accounts for specified purposes, including debt and defined contribution, sinking fund obligations, amounts held in trust for residents, state regulatory required escrow accounts, and vending machine funds, the disruption of which would cause comingling of the various Debtors'

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<sup>3</sup> 39 of the accounts are held at Old National Bank, 18 accounts are held at UMB, each of which are restricted cash accounts related to the reserves required under the Debtors' existing bond debt (save and except one reserve account holding the PACE sale proceeds), 4 accounts at Centier Bank, 6 accounts at First Mid Bank, 4 accounts at Heartland Bank, 1 account at PNC Bank, 1 account at Mid-Missouri Bank, 1 account at Jackson County Bank, 4 accounts at Peoples National Bank, 1 account at Hickory Point Bank, 1 account at Marine Bank, 1 account at Southwest Missouri Bank, 1 account at American National bank, 2 accounts at Old National Bank, 2 accounts at Lument Capital, 2 accounts at Kotner Title Company, and 1 account with Corebridge Financial.

affiliates and undue confusion amongst the Debtors' operational personnel. Closing the Accounts will also increase the work of the Debtors' accounting personnel, who are already busy addressing the many and varied issues related to these Chapter 11 cases. Closing the Accounts and opening new ones under the circumstances described herein would needlessly cost the Debtors time and money at a time when they are trying to conserve both, and would result in no discernible benefit to the Debtors' bankruptcy estates, while potentially causing irreparable harm thereto.

12. The Debtors also request authority to continue using their business forms without the designation "Debtors in Possession" on them. The Debtors' forms are preprinted or are electronically printed and, with some work, can be electronically altered. The Debtors seek the authority of this Court to utilize their electronically generated forms without the "Debtors in Possession" designation until the adjustments to the software can be initiated and existing stock is exhausted.

13. Subject to the DIP Documents, the Debtors request that the Court authorize them to continue using their Cash Management System in connection with the continued use of Accounts and continued use of the Debtors' business forms; in furtherance thereof, the Debtors further request that the Court authorize and direct the Banks to continue honoring the Debtors' transactions.

#### **Relevant Background to the Motion**

14. As set forth above, as well as in the concurrently filed First Day Declaration, the Debtors maintain approximately eighty-nine (89) accounts (the "**Accounts**"), with fourteen (14) commercial banks, one (1) title company, one (1) senior care investment and asset management firm, and one (1) retirement financial advisory firm.

15. From a broad perspective, under the cash management system each resident community has their own deposit account. Those deposit accounts are zero balance accounts and sweep each night either into the Christian Homes Inc. Concentration Account or the Midwest Christian Village Account.

16. If a location is part of the “**Obligated Group**” (i.e. subject to the Bondholder’s claims), it sweeps into the Christian Homes Inc. Concentration account. If that community is not in the Obligated Group then it sweeps into the Midwest Christian Village Concentration Account. A separate account is maintained for payroll and payroll tax payments.

17. The entities that have a HUD mortgage are required to maintain their own deposit accounts and operating accounts. Mortgage payments for the two facilities financed by HUD are made out of each of those respective facilities’ accounts.

18. The Debtors maintain the centralized payable system so almost all payments go out of the Concentration Accounts. Most vendor disbursements are done via checks runs of paper checks.

19. Wire/ACH payments are go out of the Midwest Christian Concentration Account - but that activity is very limited.

20. The Accounts are listed by Debtor entity in Exhibit A. The Unrestricted Cash Accounts and Investments totaled approximately \$8,500,000 on May 31, 2024.

21. The Debtors held approximately \$13,000,000 in restricted funds on May 31, 2024, but the vast majority of that was offset by the Indenture Trustee for the Bondholders on or about June 10, 2024. As of the filing date, the Debtors maintain approximately \$1MM in restricted funds after that offset in accounts that are not related to or pledged as security for the Bondholder’s debt.

22. A chart showing the flow of funds through the depository accounts for each facility and into each of the Concentration Accounts is attached hereto as **Exhibit B**.

**Basis for Relief**

**A. The Debtors' Continued Use of the Cash Management System Is Essential to the Debtors' Operations and Restructuring Efforts.**

23. The U.S. Trustee Guidelines require, absent court order(s) to the contrary, debtors-in-possession to, among other things: (a) establish one debtor-in-possession bank account for all estate monies required for the payment of taxes, including payroll taxes; (b) close all existing bank accounts and open new debtor-in-possession accounts; (c) maintain a separate debtor in possession account for cash collateral; and (d) obtain checks that bear the designation “debtor-in-possession” and reference the bankruptcy case number and type of account on such checks. These requirements are designed to provide a clear line of demarcation between prepetition and postpetition claims and payments and help protect against the inadvertent payment of prepetition claims by preventing banks from honoring checks drawn before the Petition Date.

24. The continuation of the Cash Management System is nevertheless permitted pursuant to §§ 363(b)(1) and (c)(1). Section 363(c)(1) authorizes a debtor in possession to enter into transactions in the ordinary course of business without notice and a hearing; whereas § 363(b)(1) authorizes a debtor in possession to use property of the estate other than in the ordinary course of business after notice and a hearing. The Debtors request to continue using their Cash Management System in the ordinary course of business; but even if any of the relief requested herein could be considered outside the ordinary course, the Court may approve it.

25. Courts in this district have regularly waived the U.S. Trustee Guidelines on requests for relief similar to what is being asked for here on the grounds that the guidelines are impractical and potentially detrimental to a debtor’s postpetition business operations and restructuring efforts in similar large Chapter 11 cases. *See, e.g., In re Briggs & Stratton Corporation*, No. 20-435797-399 (ABG) [Dkt. No. 17, 118, 170 and 528] (Bankr. ED Missouri, 2020); *In re Allied Healthcare*



*Products*, No. 23-41607 [Dkt. No. 5, 59 and 101] (Bankr. ED Missouri, 2023).

26. Bankruptcy courts routinely treat requests for authority to continue utilizing existing cash management systems as a relatively “simple matter.” *In re Baldwin-United Corp.*, 79 B.R. 321, 327 (Bankr. S.D. Ohio 1987). In addition, in granting such relief, courts recognize that an integrated cash management system “allows efficient utilization of cash resources and recognizes the impracticalities of maintaining separate cash accounts for the many different purposes that require cash.” *In re Columbia Gas Sys., Inc.*, 136 B.R. 930, 934 (Bankr. D. Del. 1992), *aff’d* in relevant part, 997 F.2d 1039, 1061 (3d Cir. 1993). The requirement to maintain all accounts separately “would be a huge administrative burden and economically inefficient.” *Columbia Gas*, 997 F.2d at 1061; *see also In re Southmark Corp.*, 49 F.3d 1111, 1114 (5th Cir. 1995) (stating that cash management system allows debtor “to administer more efficiently and effectively its financial operations and assets”).

27. Here, the Cash Management System constitutes an ordinary course and essential business practice of the Debtors. The Cash Management System provides significant benefits to the Debtors including, among other things, the ability to (a) control corporate and Debtors’ funds, (b) segregate resident deposits and deposits, (c) ensure the maximum availability of funds when and where necessary, and (d) reduce costs and administrative expenses by facilitating the movement of funds and the development of more timely and accurate account information.

28. The operation of the Debtors businesses requires that the Cash Management System continue during the pendency of these Chapter 11 cases. As a practical matter, because of the Debtors’ history and structure, it would be extremely difficult and expensive to establish and maintain a new cash management system; and it would be extraordinarily disruptive and harmful to their operations at this early and critical stage of their cases. Reestablishing and reconnecting

deposits and billings to new accounts would be impractical, costly, and an inefficient use of the Debtors' resources. Any such disruption would have a severe, adverse, and potentially irreparable impact upon the estates. Consequently, maintaining the Cash Management System is in the best interest of all parties in interest, including patients.

29. Accordingly, the Debtors request the Court authorize the continued use of the existing Cash Management System to facilitate the Debtors' transition into Chapter 11. Specifically, the Debtors request that the Court authorize the Banks to continue to maintain, service, and administer the Accounts as accounts of the Debtors as debtors in possession, without interruption and in the ordinary course of business. Requiring the Debtors to close the Accounts and to open new ones will disrupt the Debtors' business and cash flow, which could affect patient care. Further, closing the Accounts and opening new ones will also increase the work required of the Debtors' accounting personnel who already are busy addressing the many and varied issues related to the commencement of this Case, and would needlessly cost the Debtors time and money with no discernible benefit to the estate at a time when they are trying to conserve both.

30. Even though the Debtors have multiple accounts, the Debtors only utilizes one account for the vast majority of its daily disbursements. As such, there will be no confusion of postpetition transactions with prepetition ones. Requiring the Debtors to close the Accounts would serve no purpose but would delay the Debtors' ability to utilize their funds, put further burdens on accounting personnel dealing with the Debtors' many financial issues and cost the Debtors time and money better used in their efforts to maximize value of the estate for their creditors.

**B. Authorizing the Debtors to Continue Conducting Intercompany Transactions in the Ordinary Course and Granting Administrative Expense Priority to Postpetition Intercompany Claims Is Necessary and Appropriate**

31. The Debtors' funds are aggregated in the Cash Management System. The Debtors track all fund transfers in their accounting system and have the ability to account for all

intercompany transfers related to cash receipts and disbursements. The Debtors, moreover, will continue to maintain records of such intercompany transfers.

32. Since these transactions represent extensions of intercompany credit made in the ordinary course of business that are an essential component of the Cash Management System, the Debtors request the authority to continue conducting the intercompany transactions in the ordinary course of business without need for further Court order. If the intercompany transactions were to be discontinued, the Cash Management System and related administrative controls would be disrupted to the Debtors' and their estates' detriment. Accordingly, the Debtors submit that the continued performance of the intercompany transactions is in the best interest of the Debtors' estate and their creditors and, therefore, the Debtors should be permitted to continue such performance.

33. Also, to ensure each individual Debtor will not fund, at the expense of its creditors, the operations of another entity, the Debtors request that, pursuant to §§ 364(b), 503(b)(1) and 507(a)(2), all intercompany claims arising after the Petition Date be accorded administrative expense priority. This relief will ensure that each entity receiving payments from a Debtor will continue to bear ultimate repayment responsibility for such ordinary course transactions, thereby reducing the risk that these transactions would jeopardize the recoveries available to each Debtor's respective creditors.

34. Moreover, similar relief has been regularly granted by courts in other complex multi-debtor Chapter 11 cases. *See, e.g., In re Caesars Entertainment Operating Company, Inc.*, No. 15-01145 (ABG) [Dkt. No. 989]; *In re ITR Concession Co.*, No. 14-34284 (PSH) [Dkt. No. 185] (Bankr. N.D. Ill. Oct. 28, 2014); *In re Edison Mission Energy*, No. 12-49219 (JPC) [Dkt. No. 768] (Bankr. N.D. Ill. May 15, 2013); *In re Kimball Hill, Inc.*, No. 08-10095 (SPS) [Dkt. No. 175]

(Bankr. N.D. Ill. May 13, 2008); *In re UAL Corp.*, No. 02-48191 (ERW) (Bankr. N.D. Ill. Dec. 9, 2002); *In re Dade Behring Holdings, Inc.*, No. 02-29020 (BWB) [Dkt. No. 86] (Bankr. N.D. Ill. Aug. 1, 2002).

**C. Honoring Certain Prepetition Obligations Related to the Cash Management System Should Be Approved**

35. The Debtors incur periodic service charges and other fees from the Banks in connection with the maintenance of the Cash Management System (collectively, the “Bank Fees”), which average approximately \$13,400 per month most of which are automatically deducted from each account as it comes due and little to no prepetition fees are due and owing. Payment of any prepetition Bank Fees that are due and owing is in the best interests of the Debtors and all parties in interest in these Chapter 11 cases, as it will prevent unnecessary disruptions to the Cash Management System and ensure that the Debtors’ receipt of funds are not delayed. Further, because the Banks likely have setoff rights for the Bank Fees, payment of prepetition Bank Fees should not alter the rights of unsecured creditors in these Chapter 11 cases.

**D. Authorizing and Directing the Banks to Honor Postpetition Checks and Granting Banks Limited Relief from the Automatic Stay**

36. In relation to the above requested relief, the Debtors also request that the Court: (i) authorize and direct the Banks to honor postpetition checks drawn on and transfers made from the Accounts; (ii) require that in the event the Banks refuse to honor checks drawn on their Accounts or transfer instructions made on their Accounts (provided there are sufficient good funds in the account to honor the checks or transfer instructions and the checks are otherwise properly payable), the Banks immediately turn over the deposits held in the applicable Accounts upon the Debtors’ request, and (iii) grant the Banks limited relief from the automatic stay to continue to offset standard monthly or periodic bank fees against the Accounts in the same manner as such fees were offset prepetition.

**E. Maintenance of the Debtors' Existing Business Forms Is in the Best Interests of the Estates**

37. The Debtors are also requesting authority to continue using their business forms without the designation “Debtors-in-Possession” on them for a limited time. Parties doing business with the Debtors undoubtedly will be aware of their status as debtors-in-possession and, thus, changing business forms at this time is unnecessary and would be unduly burdensome. Many of the Debtors’ business forms are electronically generated or, if printed, can be electronically altered but only after the adjustments are made to the appropriate software systems. The Debtors seek the authority of this Court to utilize their forms without the “Debtors-in-Possession” designation until existing stock is exhausted, and until the Debtors can make the necessary adjustments to their software so that these forms will contain the phrase “Debtors-in-Possession.”

38. Indeed, courts in this district have allowed debtors to use their prepetition business forms without the “debtor-in-possession” label. *See, e.g., See, e.g., In re Briggs & Stratton Corporation*, No. 20-435797-399 (ABG) [Dkt. No. 17, 118, 170 and 528] (Bankr. ED Missouri, 2020).

39. Accordingly, the Debtors respectfully request continued use of their existing business forms as set forth above, until existing stock is exhausted and software adjustments can be made.

**F. The Court Should Authorize the Banks to Immediately Release Any and All Administrative Holds and/or Freezes That They May Have on the Accounts**

40. The United States Supreme Court has discussed whether the placement of an administrative “freeze” or hold on a debtor’s bank account violates the automatic stay and its holding depends on several factors including under which Chapter of the Bankruptcy Code the case is proceeding and what, if any, setoff rights the bank holds. *See Citizens Bank of Md. v. Strumpf*, 516 U.S. 16 (1995).

41. The Debtors are not seeking any determination from the Court at this time with respect to the validity or the permissibility of the policy described above. Nonetheless, as the Debtors are seeking to keep the Cash Management System in place, and concurrently requesting

authority to immediately pay prepetition payroll, in an abundance of caution, the Debtors respectfully request that the Court exercise its authority pursuant to § 105 and authorize the immediate release on all holds or freezes on the Accounts.

**The Requirements of Bankruptcy Rule 6003 Are Satisfied**

42. Bankruptcy Rule 6003 empowers a court to grant relief within the first 21 days after the Petition Date “to the extent that relief is necessary to avoid immediate and irreparable harm.” For reasons discussed above, authorizing the Debtors to (1) continue to operate the Cash Management System, (2) honor certain prepetition obligations related thereto, (3) maintain existing business forms, and (4) continue to perform intercompany transactions consistent with historical practice as well as granting the other relief requested herein is integral to the Debtors’ ability to transition their operations into these Chapter 11 cases. Failure to receive such authorization and other relief during the first 21 days of these Chapter 11 cases would severely disrupt the Debtors’ operations at this critical juncture. For the reasons discussed herein, the relief requested is necessary in order for the Debtors to operate their business in the ordinary course and continue to provide adequate patient care and preserve the ongoing value of the Debtors’ operations and maximize the value of their estates for the benefit of all stakeholders. Accordingly, the Debtors submit that they have satisfied the “immediate and irreparable harm” standard of Bankruptcy Rule 6003 to support granting the relief requested herein.

**Waiver of Bankruptcy Rule 6004(a) and 6004(h)**

43. To implement the foregoing successfully, the Debtors request that the Court enter an order providing that notice of the relief requested herein satisfies Bankruptcy Rule 6004(a) and that the Debtors have established cause to exclude such relief from the 14-day stay period under Bankruptcy Rule 6004(h).

**No Prior Request**

44. No prior request for the relief sought in this Motion has been made to this or any

other court.

**Notice**

45. The Motion will be provided Master Service List No. 1 (dated July 16, 2024) and the Notice of Hearing on the Motion will be served on the Master Notice List No. 1 (dated July 16, 2024). Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-3(A)(1). The Debtors submit that, under the circumstances, no other or further notice is required.

The Debtors request entry of interim and final orders, allowing on an interim basis and then a final basis, waiving the delay of the effectiveness of the order, making the same effective upon entry and allowing the Debtors to: (1) continue to use their cash management system, including the continued maintenance of their existing bank accounts and business forms; (2) implement changes to their cash management system in the ordinary course of business, including opening new or closing existing bank accounts; (3) continue to perform under and honor intercompany transactions in the ordinary course of business, in their business judgment and in their sole discretion; (4) provide administrative expense priority for postpetition intercompany claims; authorize the financial institutions at which the Debtors maintain various bank accounts to (5) (a) continue to maintain, service and administer the Debtors' bank accounts, and (b) debit the bank accounts in the ordinary course of business on account of (i) wire transfers or checks drawn on the bank accounts, or (ii) undisputed service charges owed to the banks for maintenance of the Debtors' cash management system, if any and (6) such other and further relief that may be just and proper.

Dated: July 16, 2024  
St. Louis, Missouri

Respectfully submitted,

**DENTONS US LLP**

/s/ Stephen O'Brien

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*Proposed Co-Counsel to the Debtors  
and Debtors-in-Possession*



**Exhibit A**  
**Accounts**

**Exhibit A – Accounts**

<b>Bank</b>	<b>Location</b>	<b>Account Name</b>
<b>Cash Unrestricted Accounts</b>		
Centier Bank	CPCV	Chicagoland Christian Village Auxiliary
Centier Bank	CPCV	Chicagoland Christian Village Activity
First Mid	WCALP	Wabash Christian Apartments Limited Partnership
First Mid	WBCV	Wabash Christian Retirement Center Auxiliary
Old National Bank	BHC	Barber Christian Home Care
Old National Bank	CLI	Carelink
Old National Bank	THCV	Christian Homes DBA The Christian Village
Old National Bank	WSCV	Christian Homes DBA Washington Christian Village
Old National Bank	CHI	Christian Homes Inc.
Old National Bank	CHI	Christian Homes Inc. Payroll Account
Old National Bank	CO	Corporate Office
Old National Bank	CPCV	Crown Point Christian Village Inc.
Old National Bank	FHCV	Fair Havens Christian Home Inc.
Old National Bank	HPCV	Fair Havens Christian Homes DBA Hickory Point Christian Village
Old National Bank	HLCV	Heartland Christian Village LLC AP Account
Old National Bank	HLCV	Heartland Christian Village - Non Government
Old National Bank	HLCV	Heartland Christian Village LLC Deposit Account
Old National Bank	HOCV	Hoosier Christian Village Inc.
Old National Bank	JOCV	Johnson Christian Village
Old National Bank	LMCV	Lewis Memorial Christian Village
Old National Bank	MCV	Midwest Christian Villages
Old National Bank	SCP	Midwest Senior Ministries Inc. Senior Care Pharmacy
Old National Bank	RSCV	Risen Son Christian Village
Old National Bank	SHCV	Shawnee Christian Nursing Center
Old National Bank	SRCV	Spring River Christian Village
Old National Bank	WBCV	Wabash Christian Retirement Center
Old National Bank	WCT	Wabash Christian Therapy and Medical Clinic
Old National Bank	WELP	Wabash Estates - Non Government
Old National Bank	WELP	Wabash Estates LP AP Account
Old National Bank	WELP	Wabash Estates LP Deposit Account
Old National Bank	WVELP	Washington Village Estates - Non Government
Old National Bank	WVELP	Washington Village Estates LP AP Account
Old National Bank	WVELP	Washington Village Estates LP Deposit Account
Old National Bank	RBCV	River Birch Christian Village LLC
Old National Bank	PEO	Christian Horizons Living LLC
Old National Bank	PACE	Prime Acquisitions LLC
Old National Bank	PACE	Prime Acquisitions LLC TPA

Old National Bank	SCP	Senior Care Pharmacy Services
Heartland Bank	THCV	The Christian Village Auxiliary
Heartland Bank	THCV	The Christian Village Vending
PNC Bank	LMCV	LMCV Auxiliary Fund
Mid-Missouri Bank	SRCV	Spring River Christian Village Auxiliary
Jackson County Bank	HOCV	Hoosier Christian Village Auxiliary
Peoples National Bank	RSCV	Risen Son Christian Village Activity Fund
Peoples National Bank	RSCV	Risen Son Christian Village Vending Machine Fund

**Investments**

Old National Bank	Christian Homes Inc.
Old National Bank	Christian Homes Inc.
Old National Bank	Christian Homes Inc.
Old National Bank	Christian Homes Inc.

**Cash Restricted**

Centier Bank	CPCV	Chicagoland Christian Village Resident Trust
Hickory Point Bank	HPCV	Hickory Point Christian Village Resident Trust
First Mid	WBCV	Wabash Christian Retirement Center Resident Trust
Heartland Bank	THCV	The Christian Village Resident Funds in Trust
Marine Bank	LMCV	LMCV - Resident Trust
Southwest Missouri Bank	SRCV	Spring River Christian Village Resident Trust
The Peoples Bank	HOCV	Hoosier Christian Village Resident Trust
American National Bank	RSCV	Risen Son Christian Village Resident Trust
First Mid	WCALP	Wabash Christian Apts Operating Reserve
First Mid	WCALP	Wabash Christian Apartments Security Deposit Account
First Mid	WCALP	Wabash Christian Apts Replacement Reserve
First Mid	WELP	Wabash Estates DBA Supportive Living Security Deposit
Old National Bank	WELP	Wabash Estates LP Reserve
Old National Bank	WVELP	Washington Village Estates LP Reserve
The Peoples Bank	HOCV	Hoosier Christian Village Entrance Fee Escrow
Centier Bank	CPCV	Chicagoland Christian Village Inc ES
Heartland Bank	SRCV	Spring River Duplex Escrow

UMB	CHI	Christian Homes Inc IFA Series 2016 Bond Sinking
UMB	CHI	Christian Homes IFA 2016 Interest
UMB	CHI	Christian Homes IFA 2016 Reserve
UMB	CHI	Christian Homes IFA 2016 Revenue
UMB	CHI	Christian Homes IFA 2016 Wabash Remedial
UMB	CHI	Christian Homes MOHEFA 18 Debt Svc
UMB	CHI	Christian Homes Master Debt Svc Res
UMB	CHI	Christian Homes MOHEFA 18 Wabash Rem
UMB	CHI	Christian Homes IFA 21A Bond Sinking
UMB	CHI	Christian Homes IFA 21A Interest
UMB	CHI	Christian Homes IFA 21A Project

UMB	CHI	Christian Homes IFA 21A Revenue
UMB	CHI	Christian Homes IFA 21A Wabash Remedial
UMB	CHI	Christian Homes IFA 21B Bond Sinking
UMB	CHI	Christian Homes IFA 21B Expense
UMB	CHI	Christian Homes IFA 21B Interest
UMB	CHI	Christian Homes IFA 21B Revenue
UMB	CHI	NEW Horizons Master PACE Sale Proceeds
	Wabash Estates, LLC	
Lument Capital	Washington Village Estates, LLC	Tax/Insurance/MIP/Replacement Reserve Escrow Account
Lument Capital	LLC	Tax/Insurance/MIP/Replacement Reserve Escrow Account
Kotner Title Company	CHI	WBCV Escrow Holdback Account
Kotner Title Company	MCV	PACE Escrow Holdback Account
<b>Other</b>		
Corebridge Financial	CHI	Christian Homes, Inc

**Exhibit B**  
**ONB Bank Account Flow Chart**

Christian Horizons Old National Bank Accounts Flow Chart

