

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, 572, and 614

**NOTICE OF FILING OF EIGHTH AND FINAL 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].



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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 *Eighth Affidavit of Shawn O’Conner in Lieu of Appointment of a Patient Care Ombudsman*, attached hereto as **Exhibit A**. This is the Debtors’ final Self Report.

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: March 28, 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

**Eighth 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

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Related Docket Nos. 8, 101, 229,
372, 413, 499, 542, 572, and 614

NOTICE OF EIGHTH AND FINAL 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 February 1, 2025 through February 28, 2025 and is the Debtors' final Self Report. 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: March 28, 2025
St. Louis, Missouri

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

Exhibit 1

**DEBTORS' EIGHTH AND FINAL 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 February 1 through and including February 28, 2025: **Please note that as of 2/28/2025 all care staff members have transitioned to new organizations and all communities have been divested or under new management. With that, this will be the final PCO Self-Report.**

a. Staff Numbers:

<u>Position</u>	<u>Count</u>
Accountant	5
Administrator	8
Admission	0
Assistant Director of Nursing	1
Chaplain	2
CNA	327
Culinary	65
Culinary Manager	3
Director	15
Director of Nursing	4
Driver	2
Executive	3
Executive Assistant	2
Facility Support	45
Human Resources	14
Laundry	7
LPN	206
LPN Manager	10
Medication Aide	46
Manager	10
Office Support	29
Pharmacist	3
Pharmacy Tech	12
RN	63
RN Manager	6
Scheduler	3
Supportive Aide	9
Supervisor	6
Social Worker	1
Transportation Aide	5
Wellness	13
SLP	9
COTA	13
OT	15
PT	15
PTA	17
Therapy Wellness	2

- With respect to “Staff Members” and the status or standing of any licenses held by staff members, I report, for the period of February 1 through and including February 28, 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 February 1 through and including February 28, 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 February 1 through and including February 28, 2025:
 - a. No material changes for the reporting period. Please note that the Debtor has transferred substantially all employees to new organizations.
- 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 February 1 through and including February 28, 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 February 1 through and including February 28, 2025:
 - a. Survey Activity:
 - i. Crown Point Christian Village:
 - 1. An unannounced recertification and complaint survey occurred from 2/17/25 through 2/24/25. The final plan of correction was submitted by new ownership after the community transacted on 2/28/2025.
 - ii. Lewis Memorial Christian Village:
 - 1. An unannounced complaint survey was conducted by the regulatory agency on February 2, 2025 related to improper care and staffing. The complaint was invalid and no findings. The community is in substantial compliance.
 - b. Grievances:
 - i. Crown Point Christian Village:

1. Resident voiced concern with their roommate and possible abuse on 2/17/2025. This was fully investigated and reported to the state agencies. The allegation was unfounded, and the resident was provided another room.
 2. Family member of a resident expressed concern with the care and requested a copy of the medical records from the state agency on 2/24/2025. This family member was found to not have legal authority to obtain medical records and no further concerns noted.
- 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 February 1 through and including February 28, 2025:
 - a. No updates to report during this period
 - 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 and Washington Estates, and Wabash Apartments are currently under interim management agreements with Chapters Senior Living pending the HUD assumption. Wabash Apartments has been transitioned and the IHDA debt has been paid off as of March 6, 2025. In addition, the Crown Point Christian Village closed 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 and transaction closed on 3/6/2025.
 - x. Hoosier Christian Village was divested and transitioned on 2/20/25.
 - xi. Crown Point Christian Village was 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 February 1 through and including February 28, 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.
 - 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.
 - d. 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 February 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 February 1 through and including February 28, 2025:
 - a. No concerns to report during this period.