

John Frederick Behnken, Jr.
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Waldron, MI
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<<<< PLEASE CORRECT MY ZIP CODE IN YOUR RECORDS!!!

ModivCare Inc. Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

United States Courts
Southern District of Texas
FILED

SEP 23 2025
Nathan Ochsner, Clerk of Court

2025-09-19

Re: Case No. 25-90309 (ARP), specifically: Modivcare Solutions, LLC (25-90359)

To Whom It May Concern,

My name is John Frederick Behnken, Jr.; I am a permanently disabled man living in Michigan, whose only income is the federal minimum payment from Social Security.

For providing my transportation to and from healthcare from June 2024 through May 2025 at my personal expense, Modivcare Solutions, LLC issued me a check for mileage reimbursement for \$435.72, dated June 27, 2025. Relying upon this payment being "in the normal course of business" for my relationship with Modivcare Solutions, LLC, I cashed said check on September 12, 2025.

I have since received your decidedly **UNTIMELY**, and **UNDATED** notices, informing me Modivcare Solutions, LLC filed for bankruptcy **NEARLY A MONTH AGO**; But, per your letter, bankruptcy does "not change anything about [my] relationship with Modivcare." Thus, I believe this debt has been paid, but, since I cannot know if these funds will be "clawed back," presenting both a burden and a hardship upon someone so poor as myself, I am submitting this claim and all documentary evidence of the debt, with this letter of explanation, in order to preserve my claim to these same funds.

It is important to note these funds originate from Medicaid via the Michigan Department of Health and Human Services, through my health insurance provider, Blue Cross Complete of Michigan, LLC, to Modivcare Solutions, LLC; So, Modivcare Solutions, LLC's retention of any portion of these funds would not only be improper, but also very likely constitutes a federal crime.

This entire situation has left me racked with stress, and presently unable to eat more than 3 ounces per day, as I am now nauseated by the smell of food, and am experiencing significant sleep disruptions, owing solely to your untimely notices; In this day and age, you have the capability to have informed me and other claimants immediately upon filing in an attempt to prevent this specific situation from arising, but failed to do so, and in that negligence you have caused me, and I'm sure others, both personal harm and expense.

I am anxious to resolve this matter promptly, so please have someone, in a position to settle this claim immediately, call me; They may have to attempt to reach me multiple times on multiple days, if I do not answer, as I often do not have a cellular signal or the ability to answer during the course of my frequent medical treatments, and because of my religious beliefs, I **CANNOT** retrieve voicemails, so you are advised **NOT** to leave one.



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John Frederick Behnken, Jr.