

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

United States Courts
Southern District of Texas
FILED
SEP 16 2024
Nathan Ochsner, Clerk of Court

**PLAINTIFF CREDITOR MEMORANDUM TO THE COURT OF HUMAN
ELEMENT IN THIS CASE**

COMES NOW, Plaintiff Creditor Donald Rolle pro se in forma pauperis this creditor wishes to remind the court ounce again there have been many delays in my case starting in 2018 amended in 2020 and these same ¹debtors have taken advantage of these delays to accumulate debt by backing civil cases filed that include delays caused by covid-19 that all but locked down many prison systems for (2) years. The debtors were actually getting paid their normal billing cycles but provided no or extremely limited medical services while not paying their bills as if the debtors were coached on how to do this.

Now the delays have been multiplied by this bankruptcy case that by **all definitions is a fraud** actually admitted to by Lefkowitz under oath and just an obvious attempt at even more delays. These debtors have defrauded patients, states and the federal government leaving a wake of death, pain and suffering across the country! I personally suffer every single day currently as I have since October 2018 with the results of these debtors lack of constitutional adequate medical care!

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027



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Like Purdue Pharma and Johnson & Johnson these debtors have caused death and serious bodily injury to thousands the **exception here is that these are throw away incarcerated humans** and their medical treatment doesn't matter. These debtors **intentionally targeted this population** for the soul purpose of profiting billions of dollars knowing that this population goes unrepresented 99% of the time and there would be little or no reprisal for their actions if their actions where to ever get to any criminal court the 404- b evidence would crush them all and because of the severity of their crimes would warrant the death penalty in the very state they attempt to apply the Texas two-step in.

The court needs to remember that not only is this population unrepresented but it needs to consider that realistic numbers show that **for every legitimate civil case filed by the incarcerated** due to the difficulty and cost of filing a civil case **there are (3) other incarcerated that can't or don't file a legitimate civil case** for their deaths or medical injuries caused by these same debtors over and over again! That means the court has seen **less than 25% of the actual damage** done by years of poor to no constitutional adequate medical care by these debtors all in the name of nothing more than billions in profits! There are third world countries that this type of corruption is abhorred by political leaders in this country where they are sanctioned for targeting a certain population group!

As in the audio 1688 of status conference hearing and nearly all other hearings all the conversation has been about money while financial compensation is critical it is not the only recovery necessary to ~~consider in this case as it was in both~~ Purdue Pharma and Johnson & Johnson. These debtors by all accounts should be bankrupt and prosecuted for their involvement in the deaths and injuries across the country. The only reason that they are not is because of the **population they have intentionally targeted killed and damaged are incarcerated humans!** There has been decades of suffering going unchecked because of this population.

Like me the court needs to ask what happens when the money is paid and I still have these serious medical conditions to deal with! Remember I am still incarcerated and WDOC has as I stated in Doc. 1337 did exactly as was predicted WDOC contracted a scumbag medical contractor based on its liability

insurance not its medical history. WDOC Director Dan Shannon (ex-case worker) actually paid this scumbag contractor 7.6 million dollars to acquire its 2.27 million dollars in liability insurance over its nearest competitor. And only a fool can believe 2.27 million dollars of liability insurance actually costs 2.27 million dollars! That is how important not supplying constitutional adequate medical care to inmates is to the new prison model! If that does not smell of a kickback scheme I don't know what does. This guy Dan Shannon has no experience that would make him qualified to make any decision of this level that affects the health care of the incarcerated at WDOC!

Multiple human rights organizations and a law college agreed with me in Doc. 1398 on this prediction and when is this court going to hold these prisons and debtors accountable for their intentional actions that cause so much death and suffering across the country; the question needs to be asked "why hasn't the prison system and the court system evolved as society has on medical rights' issues?" The only way these debtors and others of the same ilk will stop using this vulnerable population as a means to profit in the billions is for this court to take that option away from them at this time!

These individuals have their hedge funds, million dollar mansions, expensive boats, expensive cars and full bank accounts, while the incarcerated humans have continued loss and suffering! This suffering is often handed down to family members who if and when the incarcerated are released have to foot the bills caused by these debtors. Everything said at the hearing audio 1688 **still is leaving the incarcerated at limbo**.because-you-would-have to spend months as an attorney to understand your options with little or no understanding of what you may be signing away and for sure no mention of a rainy day fund to cover **future medical care** caused by these debtors intentional acts! This leaves the incarcerated in the position where we will have to battle with the future prison medical contractors for a problem created by these debtors. The big corporations who can afford multiple attorney firms to represent them are the only ones who have a chance at a reasonable decision in this matter!

WHEREFORE Plaintiff-Creditor Donald Rolle asks of this Court to take the action appropriate to hold these individuals and corporations responsible for their intentional actions that have occurred and have been left unchecked for years across the country that have caused harm even death (mostly undisputed) to one of the most vulnerable populations in this country that cannot receive representation based on their circumstances. These repeated actions leaving a wake of death, pain and suffering across the country by the same parties for years cannot be considered coincident or mistake any longer. If we the incarcerated don't fight this now we can expect to fight medical care the rest of our lives. This document filed on this Time 13:00 and Date: September, 9th 2024.

Signed: 

Donald Rolle #25795
Wyoming Medium Correctional Institute
7076 Rd 55 F
Torrington, Wyoming 82240

CERTIFICATE OF SERVICE

I hereby certify that this filing was placed into a U.S. postal box at WMCI or handed to a WDOC prison official to place into a U.S. postal box at WMCI on this Time 13:00 and Date: 13:00 September, 9th 2024.

Signed: 

Donald Rolle #25795
Wyoming Medium Correctional Institute
7076 Rd 55 F
Torrington, Wyoming 82240