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*Proposed Attorneys for the
Debtors and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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In re:	§ Case No. 22-80000-sgj11
	§ (Jointly Administered)
CHRISTIAN CARE CENTERS, INC. and	§
CHRISTIAN CARE CENTERS FOUNDATION,	§ Chapter 11
INC. ¹	§
Debtors.	§
-----X	

**DECLARATION OF MARK SHAPIRO, DEBTORS' CHIEF RESTRUCTURING
OFFICER, IN SUPPORT OF MOTION FOR DETERMINATION THAT
APPOINTMENT OF A PATIENT CARE OMBUDSMAN IS NOT NECESSARY**

I, Mark Shapiro, make the following declaration under penalty of perjury:

1. My name is Mark Shapiro; I am over 21 years of age, and I am competent to testify to the matters herein.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Christian Care Centers, Inc. (9664) and Christian Care Centers Foundation (3572). The Debtors' mailing address is 900 Wiggins Parkway, Mesquite TX 75150.

2. I am the Chief Restructuring Officer (“CRO”) of Christian Care Centers, Inc. (“CCCI”) and Christian Care Centers Foundation, Inc. (the “Foundation”) (collectively the “Debtors”) and have served in this capacity since February 2021.

3. I am a Senior Managing Director at GlassRatner Advisory & Capital Group LLC dba B. Riley Advisory Services which does business under the name B. Riley Advisory Services (“B. Riley”). I have over twenty-five years of professional experience in guiding restructuring alternatives, executing turnarounds, and otherwise providing financial guidance to companies in distress or need. My experience crosses various industries, including elder healthcare, healthcare, financial services, business services, energy, and automotive. As a turnaround consultant, I have experience in a number of disciplines needed to help improve a company’s performance including assessing a company’s financial performance, comparing operating results to industry norms, providing financial forecasts, providing cash management assistance, developing and executing business strategy and plans, analyzing markets, recreating a company’s prior year financial statements, assessing business valuations, determining cost-reduction opportunities, among others. I was introduced to the Board of the Debtors by Husch Blackwell LLP in January 2021 to assist with negotiating a forbearance agreement with the bondholders.

4. A representative list of my prior clients in the healthcare industry include the Buckingham Senior Living Community, Inc., Pine Creek Medical Center and Alliance Health/Uplift Rx. Prior appearances in the Northern District of Texas include those as Chief Restructuring Officer to Pine Creek Medical Center LLC (19-33079), Financial Advisor to the Debtors in GGI Holdings LLC *et al* (Gold’s Gym) (20-31318), and Chief Restructuring Officer in Fresh Acquisitions LLC *et al* (21-30721).

5. Contemporaneously herewith, the Debtors are filing a Motion for Determination that Appointment of a Patient Care Ombudsman is Not Necessary. This declaration supplements, in part, my May 23, 2022, declaration filed in support of the Debtors' first day motions.

6. In my capacity as the Debtors' CRO, I am familiar with the Debtors' day-to-day operations, business and financial affairs, and books and records.

7. Except as otherwise indicated herein, all facts set forth in this declaration are based upon my personal knowledge, my discussions with the Debtors' management team and Boards of Trustees, my review of relevant documents, or my opinion based upon experience, knowledge, and information concerning the Debtors' operations and financial affairs. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I am authorized to submit this Declaration on behalf of the Debtors.

8. CCCI has no intention to reduce the level of patient care it is providing as a result of the Debtors' bankruptcy filing. It also has no plans to reduce its staff.

9. After the Debtors filed for bankruptcy, CCCI has worked with staffing agencies to ensure they have agreed to provide the same services as they did pre-bankruptcy. CCCI also intends to file a motion to assume certain staffing agency contracts.

10. The Centers of Medicare and Medicaid Services issued a Five-Star Ratings of Nursing Homes Provider Rating Report for May 2022. In that report, CMS gave CCCI an overall five-star rating for its skilled nursing facility. CCCI is not subject to any current complaints to state or regulatory agencies regarding patient care issues and is not a party to any current or threatened lawsuits regarding patient case issues.

11. CCCI has a number of procedures and policies in place to allow patients to protect their rights and has several internal safeguards in place to ensure the appropriate level of care is

provided. CCCI has resident council meetings for skilled nursing, assisted living, and independent living and maintains a volunteer ombudsman, an on-site chaplain, and a hotline.

12. The resident council meetings occur monthly. These meetings are a town-hall format and provide residents with an opportunity to raise any issues they may have.

13. The volunteer ombudsman visits CCCI's skilled nursing and assisted living residents on an as needed basis. CCCI's residents are given the name and contact information for the patient ombudsman in their admission paperwork and information on how to contact the ombudsman is provided at the front lobby of each facility. The ombudsman is an independent third-party who acts to protect and help residents.

14. CCCI also has chaplains that are onsite at its Mesquite and Fort Worth campus and on call chaplains available at its Allen campus. The chaplains serve as another internal safeguard for patients and provide a mechanism for patients to raise concerns they may have. CCCI provides residents with information on how to contact the chaplains, and they have a frequent presence at CCCI's campuses.

15. The services addressed in paragraphs 11-14, above, act as an internal safeguard to ensure CCCI is providing an appropriate level of care and provide mechanisms for patients to protect their rights and raise any concerns they may have.

16. CCCI maintains a resident rights policy that is provided to all residents orally and in writing. CCCI's policies also require that an individualized comprehensive care plan be created for each resident where care is provided within seven days of completion of a resident assessment. This plan is developed with consultation of ten different categories of individuals, depending on the applicability of such person to the resident's care.

17. CCCI is not aware of any potential tension between patients and CCCI as a result of the bankruptcy filing. CCCI has internally hosted townhall meetings with residents to keep them apprised of the bankruptcy and status thereof.

18. In my opinion and given the status of the sale of substantially all of the Debtors' assets, I believe the appointment of a patient care ombudsman would prove to be an unnecessary and burdensome requirement for CCCI and the Debtors' Estates. I do not believe that the appointment of a patient care ombudsman would provide an additional benefit over and above the pre-existing safeguards that are in place within the facilities where CCCI's healthcare professionals perform services.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated this 13th day of June 2022.

/s/ Mark Shapiro
MARK SHAPIRO
CHIEF RESTRUCTURING OFFICER