

NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed: COMPLAINT
October 30, 2026 13:41

By: MATTHEW A. MOONEY 0093332

Confirmation Nbr. 4027758

RENATA SARANILLO

CV 26 149664

vs.

Judge: BRENDAN J. SHEEHAN

PLEASANT LAKE VILLA SKILLED NURSING & REHAB, ET AL

Pages Filed: 46

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

RENATA SARANILLO, ADMINISTRATOR OF THE ESTATE OF DONATA JEAN RAHNE, DECEASED c/o Michael Hill Trial Law 815 Superior Avenue, Suite 623 Cleveland, Ohio 44114 Plaintiff, vs. PLEASANT LAKE VILLA SKILLED NURSING & REHABILITATION AKA PLEASANT LAKE NURSING HOME, INC. 7260 Ridge Road Parma, Ohio 44129 Also Serve c/o Registered Agent: GH&R Business Services, Inc. 312 Walnut Street, Suite 1800 Cincinnati, Ohio 45202 and LEGACY HEALTH SERVICES AKA DMD MANAGEMENT, INC. c/o Registered Agent: GH&R Business Services, Inc. 312 Walnut Street, Suite 1800 Cincinnati, Ohio 45202 and OH 10 HOLDCO, LLC c/o Registered Agent: Incorp Services, Inc. 9435 Waterstone Boulevard, Suite 140 Cincinnati, Ohio 45249 and	CASE NO. JUDGE **COMPLAINT** **WITH JURY DEMAND AND AFFIDAVIT OF MERIT ATTACHED**

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CC OH10 OPCO, LLC
c/o Registered Agent:
Platinum Filings, LLC
555 E. Loockerman Street, Suite 320
Dover, Delaware 19901

and

CHAVOS221 HOLDINGS, LLC
c/o Registered Agent:
Harvard Business Services, Inc.
16192 Coastal Highway
Lewes, Delaware 19958

and

LIONSVIEW OPCO NR, LLC
c/o Registered Agent:
Platinum Filings, LLC
555 E. Loockerman Street, Suite 320
Dover, Delaware 19901

and

LIONSVIEW SC, LLC
c/o Registered Agent:
Platinum Filings, LLC
555 E. Loockerman Street, Suite 320
Dover, Delaware 19901

and

LIVING26 HOLDINGS, LLC
c/o Registered Agent:
Harvard Business Services, Inc.
16192 Coastal Highway
Lewes, Delaware 19958

and

SAPPHIRE143 HOLDINGS, LLC
c/o Registered Agent:
Harvard Business Services, Inc.
16192 Coastal Highway
Lewes, Delaware 19958

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and)
)
PLEASANT LAKE ASSOCIATES, LLC)
c/o Registered Agent:)
Eliav Sharvit)
12380 Plaza Drive)
Parma, Ohio 45202)
)
and)
)
RED FLAG REPORTING AKA RFR)
RESOURCES, LLC)
P.O. Box 4230)
Akron, Ohio 44321)
)
Also Serve c/o Registered Agent:)
)
Raymond Dunkle)
4081 Kingsbury Boulevard)
Copley, Ohio 44321)

Plaintiff, Renata Saranillo, Administrator of the Estate of Donata Jean Rahne, Deceased, for this Complaint against the above-named Defendants, states and avers upon information and belief:

INTRODUCTION

1. This action involves multiple claims (medical negligence, recklessness, negligence, wrongful death, Resident's Rights Law violations, civil conspiracy, and fraud) involving Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.'s ("Facility's") inadequate care of Donata Rahne and the corporate control of the facility leading to such inadequate care that it caused Donata to develop pressure injuries that became infected and led to sepsis, causing her untimely and wrongful death on November 26, 2025.

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2. On March 26, 2025, 77-year-old Donata Rahne was admitted to the Facility for rehabilitation and skilled nursing care. She had just been hospitalized for surgery to repair a broken femur, the large bone in her left thigh.

3. When Donata was admitted, the Facility documented that she was at moderate risk for skin breakdown, was incontinent of bowel, had a Foley catheter, and needed staff assistance to move in bed and transfer.

4. On March 27, 2025, the Facility's wound nurse documented deep tissue injuries on Donata's left heel, coccyx, and right buttock. The nurse noted that an air mattress and heel suspension boots were in place.

Note Text: Admission skin check completed by floor nurse on arrival to facility and wound nurse this date. Resident noted with surgical incision with intact staples to left lateral thigh, Left heel DTI, Coccyx and Right buttock noted with DTI, scattered bruising around incision to Lt lateral thigh. BUE scattered bruising. Foley in place. Treatment/ Monitor orders in place. Air mattress and Heel suspension boots to BLE in place. Prophy orders in place per facility policy.

Author: Mihaela Pascu - RN, WCN [e-SIGNED]

Effective Date: 3/27/2025 14:35
Type: Weekly wound note

Pleasant Lake's wound nurse documented deep tissue injuries on Donata's left heel, coccyx, and right buttock on March 27, 2025.

5. Regular turning and repositioning of a resident, keeping pressure off the heels, and getting the resident out of bed are some of the simplest and most effective ways to prevent pressure injuries and help them heal.

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Wound #2 current as of 03/27/2025. Wound type - pressure ulcer/injury Unstageable left heel . Measurement in centimeters: 5.2 x 6.0 x UTD cm All of wound base is visible with 100 % eschar present, with no drainage. Autolytic debridement done Mechanical debridement done. Wound #2 has deteriorated. Dr/NP notified. Family/responsible party notified. Orders changed.

Wound #3 resolved on 04/10/2025, coccyx . Wound #3 has improved. Dr/NP notified. Family/responsible party notified. Orders changed.

Wound #4 resolved on04/10/2025, buttocks . Wound #4 has improved Dr/NP notified Family/responsible party notified. Orders changed.

Author: Mihaela Pascu - RN, WCN [e-SIGNED]

Pleasant Lake's weekly wound note on May 8, 2025, documented that Donata's left heel had deteriorated into an unstageable pressure injury.

6. By April 10, 2025, the Facility documented that the injuries on Donata's coccyx and right buttock healed, but her left heel got worse. By May 8, 2025, the pressure injury on Donata's left heel grew from 3.0 cm by 4.5 cm to 5.2 cm by 6.0 cm and deteriorated into an unstageable pressure injury, meaning it was so covered in dead tissue that its depth could not be measured.

7. Donata Rahne's left heel remained an unstageable pressure injury for the rest of her time at the Facility.

8. On June 10, 2025, the Facility documented a new Stage 2 pressure injury on Donata's left buttock. A Stage 2 pressure injury is an open wound where the top layers of skin have broken down.

Wound #5 new as of 06/10/2025. Wound type - pressure ulcer/injury Stage 2 left buttocks . Measurement in centimeters. 4.0 x 2.0x 0.1 cm and scant amount of thin, straw colored drainage Autolytic debridement done. Mechanical debridement done. Wound #5 has had no change. Orders changed.

Author: Mihaela Pascu - RN, WCN [e-SIGNED]

Pleasant Lake's June 11, 2025 wound note documented a new Stage 2 pressure injury on Donata's left buttock, first found on June 10, 2025.

9. On June 11, 2025, the Facility's nurse practitioner ordered side-to-side repositioning and directed staff to "Encourage OOB [out of bed] daily."

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Continue dressing to left lateral thigh - surgical incision
Cleanse left buttock wound as ordered
Scattered open areas to buttocks-triad paste q shift
Side to side repositioning as ordered
Cleanse left heel -3xweek as ordered
Encourage OOB daily

UTI - r/o
Change foley catheter and send urine ua c/s
Continue to monitor vs ad temp
WB - may progress to for standing purpose pivoting and transferring on the LLE

Pleasant Lake's nurse practitioner's plan of care on June 11, 2025, including side-to-side repositioning and getting Donata out of bed daily.

10. The Facility's staff did not get Donata out of bed as directed because doing so required a lift. For two weeks, Donata reportedly asked staff to get up every day and was told it would happen "tomorrow," but she was put in her chair only twice.

11. By June 18, 2025, the left buttock wound had worsened to a Stage 3 pressure injury, meaning it had gone through the full thickness of the skin into the fat underneath.

Wound #5 current as of 06/10/2025. Wound type - pressure ulcer/injury Stage 3 left buttocks . Measurement in centimeters: 2.0 x 1.6 x UTD cm Wound base partially visible with 50 % granulation tissue present, 50 % slough/necrosis present, and minimal amount of thin, straw colored drainage. Autolytic debridement done Mechanical debridement done. Wound #5 has deteriorated. Dr/NP notified. Family/responsible party notified. No change in orders, continue current treatment

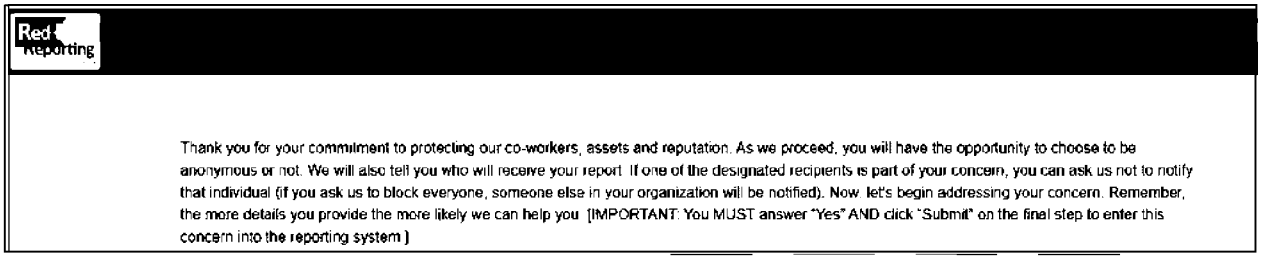
Author: Mihaela Pascu - RN, WCN [e-SIGNED]

Pleasant Lake's June 18, 2025, wound note documented that the left buttock wound had worsened to a Stage 3 pressure injury.

12. On June 26, 2025, Donata's daughter, Renata Saranillo, reported these concerns through Red Flag Reporting, the complaint reporting service Defendants used to receive concerns about resident care at the Facility. Ms. Saranillo provided her name, phone number, and email address, authorized Red Flag Reporting to share her identity with the Facility, and created an account so she could receive updates on her report.

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13. The Red Flag Reporting submission form stated, "the more details you provide the more likely we can help you." The same submission form starts by thanking the user for their "commitment to protecting our co-workers, assets, and reputation," not protecting residents like Donata Rahne.



Red Flag Reporting's Grievance Submission Form thanks the user for their commitment to protecting Red Flag Reporting's co-workers, assets, and reputation. The form also encourages the user to include as much detail as they can so the service can help them.

14. Ms. Saranillo's report regarding her mother's care was never entered into the Facility's grievance process, never investigated, and never answered.

15. Upon information and belief, Defendants and Red Flag Reporting entered into an agreement on a date prior to Donata Rahne's admission to direct complaints from family and residents to Red Flag Reporting instead of the Ohio Department of Health .

16. At the time Defendants and Red Flag Reporting entered into this agreement, knew Defendants and Red Flag Reporting, and in fact intended, that funneling complaints to Red Flag Reporting would keep complaints about resident care out of the Facility's grievance records and away from the Ohio Department of Health, so that the complaints are not investigated and do not result in citations or lower ratings on the Medicare.gov Nursing Home Compare website.

17. This agreement between Defendants and Red Flag Reporting functioned as a "catch and kill" scheme specifically designed to prevent government scrutiny and

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resulting downgrading of the Facility's star ratings – the publicly available quality measures tracked by the Centers for Medicare and Medicaid Services.

18. As a result of this agreement between Defendants and Red Flag Reporting, Renata's complaint about Donata Rahne's care on June 26, 2025, was funneled to Red Flag Reporting when Renata believed she had submitted the complaint to an official channel for addressing nursing home complaints. This diverted Renata's complaint away from the Ohio Department of Health, preventing investigation of Donata Rahne's care by the Department of Health and timely intervention to correct the negligent wound care she was receiving.

19. On July 22, 2025, the Facility documented a new pressure injury on Donata Rahne's right heel. Donata now had pressure injuries on both of her heels.

Wound #1 new as of 07/22/2025. Wound type - Pressure ulcer/injury Stage 2 right heel . Measurement in centimeters: 0.5 x 0.5 x 0.1cm All of the wound base is visible with with minimal amount of thin, straw colored drainage. Autolytic debridement done. Mechanical debridement done. No change in wound #1 status. Orders changed. Treatment/monitor orders in place.
Resident her own RP and aware.
CNP notified.

Pleasant Lake's wound nurse documented a new pressure injury on Donata's right heel on July 22, 2025.

20. By August 5, 2025, the right heel had also deteriorated into an unstageable pressure injury.

Wound #1 current as of 07/22/2025. Wound type - Pressure ulcer/injury Unstagable right heel . Measurement in centimeters: 1.0 x 1.3 x UTD cm Wound base is not visible with 100 % eschar present, with no drainage. Autolytic debridement done. Mechanical debridement done. Wound #1 has deteriorated. Dr/NP notified. Family/responsible party notified. Orders changed. wound is now unstageable pressure ulcer.
continue current treatment/monitor orders in place.
Resident her own RP and aware.
CNP notified.

Pleasant Lake's weekly wound note on August 5, 2025, documented that Donata's right heel had deteriorated into an unstageable pressure injury.

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21. On September 2, 2025, the Facility documented a new unstageable pressure injury on Donata's sacrum measuring 3.0 cm by 11.0 cm. One week later, on September 9, 2025, it measured 8.0 cm by 10.5 cm.

22. Pressure injuries do not reach an unstageable state without warning. The unstageable pressure injury first documented on Donata's sacrum on September 2, 2025 was, or should have been, apparent to the Facility's staff through reasonable skin assessments well before it reached that stage. Nevertheless, one week earlier, on August 25, 2025, a Pleasant Lake nurse documented "No new skin issues identified," and the August 26, 2025 wound notes documented only the pressure injuries on Donata's heels.

Wound #2 new as of 09/02/2025. Wound type - pressure ulcer/injury Unstageable Sacrum. Measurement in centimeters: 3.0 x 11.0 x 0.2cm Wound base is partially visible with 30 % granulation tissue present, 70 % slough/necrosis present, with moderate amount of thin, straw colored drainage. Autolytic debridement done Mechanical debridement done. No change in wound #2 status. Orders changed.

Pleasant Lake's wound nurse documented a new unstageable pressure injury on Donata's sacrum on September 2, 2025. Pleasant Lake had documented the injury on her coccyx, just below the sacrum, as resolved on April 10, 2025.

23. By October 2025, Donata's wound providers were cutting dead tissue from both of her heels and her sacrum.

Effective Date: 8/25/2025 22:18
Type: Health status

Note Text: No new skin issues identified. . .
Oxygen in use: 2 L VIA NC Lung sounds clear. No cough noted.
Foley catheter present.
Pain per WONG-BAKER pain scale 0, no hurt.
No signs/symptoms of infection present. . ,

Pleasant Lake's nurse's note on August 25, 2025, documented "No new skin issues identified," one week before the unstageable sacral pressure injury was first documented.

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24. On November 10, 2025, a Pleasant Lake nurse found green, pus-like drainage on Donata's wound dressing, and Donata complained of discomfort at her sacral dressing site.

Note Text: Dressing change completed and green pussy drainage noted on dressing. Wound nurse and NP notified and order given to start doxycycline 100mg BID x 10 days and obtain vitals. VS 107/69 61 98 1 99-90% on RA, PRN O2 administer at 2L VIA NC and PO2 holding at 95%.Resident denies SOB but c/o of slight discomfort at sacral dressing site and refused PRN pain medication.
Author: Chanae Foster - LPN [e-SIGNED]

Pleasant Lake's nurse documented green, pus-like drainage on Donata's wound dressing on November 10, 2025.

25. That same day, Facility staff documented that Donata was lethargic, difficult to arouse, and not eating or drinking. At her family's request, she was sent to the University Hospitals Parma Medical Center emergency department.

Effective Date: 11/10/2025 17:58
Type: eINTERACT SBAR Summary for Providers

Situation: The Change In Condition/s reported on this CIC Evaluation are/were: Altered mental status, .

Code Status: ADVANCED DIRECTIVE: CPR-Full Code

Outcomes of Physical Assessment: Positive findings reported on the resident/patient evaluation for this change in condition were: Altered level of consciousness (hyperalert, drowsy but easily aroused, difficult to arouse), General weakness, Not eating or drinking at all, Low O2 Stat Wound, Altered level of consciousness (hyperalert, drowsy but easily aroused, difficult to arouse,

Nursing observations, evaluation, and recommendations are: Resident lethargic and difficult to arouse, not eating.

Pleasant Lake's change in condition report on November 10, 2025, documented that Donata was lethargic, difficult to arouse, and not eating.

26. At the hospital, Donata was lethargic and disoriented, and her blood pressure dropped as low as 88/53. She was given IV fluids and antibiotics and admitted.

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27. On November 11, 2025, the hospital physician documented that Donata had "a stage IV pressure sore over the sacrum," the most severe stage of pressure injury.



Photograph of Donata's sacral pressure injury taken at UH Parma Medical Center on November 11, 2025.

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Photograph of Donata's sacral pressure injury taken at UH Parma Medical Center on November 11, 2025.

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Photograph of Donata's left heel taken at UH Parma Medical Center on November 11, 2025.

28. That same day, a CT scan showed a tract running from the skin of Donata's sacral wound to her coccyx.

Left pleural effusion appears larger and a small right pleural effusion has developed Filling defect at the left ventricular apex is unchanged Pericardial effusion is unchanged. Left iliac adenopathy is slightly smaller but retroperitoneal adenopathy is slightly larger. Also there are new mass is noted in the pancreas which are consistent with the additional metastatic disease. A tract extends from the skin to the right of the proximal to mid coccyx and the inflammation is contiguous with presacral fluid. Inflammation is present presacral fat and diffusely around the rectum. No change in L1 compression MACRO: None. Signed by: Diane Pretorius 11/11/2025 4:35 PM Dictation workstation: POMN01KARD05

November 11, 2025 CT Abdomen/Pelvis Results show a tract running from the skin of Donata's sacral wound to her coccyx.

29. On November 12, 2025, a surgeon debrided Donata's sacral wound. The surgeon documented that the wound was "very malodorous and large" with "a significant

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amount of wet gangrene," and cut away dead tissue "all the way down to bone." The sacral wound measured 10 cm by 10 cm.

The patient was seen on consult for sacral decubitus ulcer. The ulcer is very malodorous and large. There is a significant amount of wet gangrene identified. Visional debridement was performed including skin subcutaneous tissue and fascia all the way down to bone but not including bone. This was done using hemostats and a scalpel. Minimal bleeding was noted. The wound was irrigated with Vashe. The wound was then packed with the Vashe soaked gauze. The sacral decubitus ulcer measured 10 cm x 10 cm. The patient tolerated the procedure well. No complications noted. Continue with wet-to-dry dressings using Vashe.

Jeffrey M Boyko, DO

UH Parma Medical Center surgeon's note describing the debridement of Donata's sacral pressure injury on November 12, 2025.

30. Donata's blood cultures grew Staphylococcus aureus bacteria, and her urine grew Enterococcus faecalis bacteria.

31. Late on November 13, 2025, Donata was transferred to University Hospitals Cleveland Medical Center, where she was treated for sepsis, a life-threatening response to infection. Her physicians identified her heel wounds and her necrotic sacral ulcer as possible sources of the infection and documented possible infection of the bone underneath the sacral ulcer.

32. When asked to clarify the cause of Donata's sepsis, her physician wrote: "Sepsis is from bacteremia and wounds."

PROVIDER RESPONSE TEXT:

Sepsis is from bacteremia and wounds

CDI QUERY TEXT:

Clarification

UH Cleveland Medical Center physician's response documenting that Donata's sepsis was "from bacteremia and wounds."

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33. No further surgery was offered because of concern for poor wound healing and lack of benefit. On November 20, 2025, Donata was discharged to Holy Family Hospice. Holy Family Hospice listed Donata's diagnoses as including sepsis and a Stage 4 pressure ulcer of the sacral region.

34. On November 26, 2025, Donata Rahne died.

35. Plaintiff requests a trial by jury.

36. An Affidavit of Merit is attached.

37. Plaintiff brings this action for compensation for the harms and losses sustained as the result of the negligence, recklessness, conscious disregard, reckless disregard, conduct by which—through heedless indifference to the consequences—the Defendants or their staff disregarded a substantial and unjustifiable risk that the health care provider's conduct is likely to cause, at the time those services or that treatment or care were rendered, an unreasonable risk of injury, death, or loss to person or property, or intentional misconduct or willful or wanton misconduct, and other wrongful conduct described herein or discovered during litigation.

DEFENDANTS

38. Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. is an Ohio corporation that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

39. Legacy Health Services aka DMD Management, Inc. an Ohio corporation that holds itself out to the public as a provider of medical and nursing care, including but

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not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

40. OH 10 HOLDCO, LLC is an Ohio limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

41. CC OH10 OPCO, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

42. CHAVOS221 HOLDINGS, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

43. LIONSVIEW OPCO NR, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

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44. LIONSVIEW SC, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

45. LIVING26 HOLDINGS, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

46. SAPPHIRE143 HOLDINGS, LLC is a Delaware limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

47. Pleasant Lake Associates, LLC is an Ohio limited liability company that holds itself out to the public as a provider of medical and nursing care, including but not limited to, rehabilitation and skilled nursing care, through its agents, operatives and / or employees and does business as Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

48. Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc., Legacy Health Services aka DMD Management, Inc., OH 10 HOLDCO, LLC, CC OH10 OPCO, LLC, CHAVOS221 HOLDINGS, LLC, LIONSVIEW OPCO NR, LLC, LIONSVIEW SC, LLC, LIVING26 HOLDINGS, LLC, SAPPHIRE143

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HOLDINGS, LLC, and Pleasant Lake Associates, LLC, will be referred to throughout as "Pleasant Lake Defendants."

49. Red Flag Reporting aka RFR Resources, LLC is an Ohio limited liability company that holds itself out to the public as a provider of complaint reporting, compliance hotline, and case management services, including the receipt, documentation, and communication of complaints and concerns on behalf of healthcare facilities and other organizations, including Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. Upon information and belief, Red Flag Reporting aka RFR Resources, LLC ("Red Flag Reporting") acted as the agent of the Facility and the other Defendants in receiving, documenting, and communicating grievances and complaints from residents and their families regarding resident care at the Facility.

50. The Pleasant Lake Defendants employ, manage, and direct the care and service providers who were responsible for Donata Rahne's care, treatment, and safety at Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. while they were a resident there, and / or are responsible for creating unsafe conditions at the Facility through their control of the Facility management that directly led to Donata Rahne's injuries and untimely and wrongful death on November 26, 2025.

51. The Pleasant Lake Defendants direct and control operations at the Facility and are therefore directly liable for mismanagement of the Facility without regard to piercing the corporate veil.

52. The Legacy Health Services aka DMD Management, Inc., organization controls the other corporations in a way that is so complete that the corporations have no separate mind, will, or existence of their own, is exercised in such a manner as to commit

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fraud or an illegal act against the person seeking to disregard the corporate entity; and injury or unjust loss resulted to the plaintiff from such control and wrong, meaning the Defendants should be held directly liable for such harms and losses.

53. The Pleasant Lake Defendants collectively own, manage, control, and/or are responsible for the care delivered to residents of Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. directly or through their domination and control of any putative entity license holder.

VICARIOUS LIABILITY

54. The Pleasant Lake Defendants employ the care providers who were responsible for ensuring Donata Rahne's care and safety.

55. The Pleasant Lake Defendants manage, control, and/or employ the nursing staff at the Facility.

56. Donata Rahne and their family looked to the Pleasant Lake Defendants for care based upon their representations.

57. The Pleasant Lake Defendants are vicariously liable for the negligent actions of their employees and agents (respondeat superior and agency liability) and/or independent contractors (*Clark v. Southview Hosp. & Family Health Ctr.*, 68 Ohio St.3d 435, 628N.E.2d 46 (1994), agency by estoppel), including visiting physicians and nurse practitioners contracted with any of the Defendants and / or provided to residents as default or house care providers.

JURISDICTION AND VENUE

58. This Court has Jurisdiction over Defendants because, among other things, all Defendants do, and all times relevant did, purposefully avail themselves of the laws of the State of Ohio, and/or committed tortious acts within the State of Ohio.

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59. Venue is proper in Cuyahoga County, Ohio under Civil Rule 3(B) because, among other reasons: (a) one or more Defendants reside, domicile, or carry on their principal place of business in that county; and (b) part of the claim for relief arose in that county.

COMMON FACTS

60. Pleasant Lake Defendants hold themselves out to the public as providers of long-term nursing home, skilled nursing, and memory care services.

61. Pleasant Lake Defendants' for-profit model means their primary goal is to maximize profit, measured by revenues minus expenses.

62. For nursing homes generally, the largest individual revenue source is residents (filling beds), and the largest individual expense is the cost of employing nursing staff to provide care to those residents. This creates a financial incentive to take on more residents with greater care needs than the nursing staff can properly care for, a violation of federal nursing home regulations regarding staffing levels.

63. The Pleasant Lake Defendants manage, control, and / or employ the nursing staff at Facility.

64. The Pleasant Lake Defendants exercise actual control over the Facility's management and operations to maximize profits, including control over facility-level:

a. Policies and procedures, including regarding resident care;

b. Finances, including obtaining credit and loans, guaranteeing loans (both at the corporate and individual facility level), maintaining funds and banking, obtaining, owning, and leasing facility land and buildings, and capital expenditures.

c. Budgeting, including controlling the amount of funds available for staffing facilities;

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d. Personnel management, including hiring and firing, or having authority to hire and fire, the supervisory and management personnel in each facility;

e. Supervision of management, care providers, and staff in each facility, including compliance with federal and state regulations;

f. Employment, such as setting pay scales, shifts, and time and vacation policies;

g. Systems for training, monitoring, and supervising staff;

h. Medical record systems and management;

i. Financial control systems, including budgeting and payment processing;

j. Marketing, including setting the image and expectations residents and their family should expect at the facility, and even the name of the facility;

k. Reporting procedures, including reporting to Medicare as to individual resident care and facility-wide issues.

65. As the result of this control, the Pleasant Lake Defendants make decisions that affect the day-to-day care of residents of the Facility, such as the resources available for providing nursing staff and care to residents like Donata Rahne, meaning they are responsible for the foreseeable harm that results from careless decisions while voluntarily exercising that control.

66. Pleasant Lake Defendants failed to ensure, through their operational, budgetary, consultation and managerial decisions and actions, that the facilities were sufficiently staffed to meet the individual needs of its residents, including Donata Rahne.

67. Pleasant Lake Defendants engaged in a systemic practice to understaff the facilities to maximize profits at the expense of its residents' care.

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68. The Pleasant Lake Defendants systemic understaffing of the Facility resulted in a "2-star" ("below average") ranking for Staffing on the Medicare.gov Nursing Home Compare website and 2-star overall ranking.



According to the Centers for Medicare and Medicaid, Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. earned a 2-star, or "below average" rating for both Staffing and Health Inspections. This data was taken directly from medicare.gov on October 19, 2026.

69. This lack of sufficient staff directly resulted in Donata Rahne not receiving basic and necessary services to prevent, among other things, neglect leading to their injuries and death.

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70. The Pleasant Lake Defendants also exercise operational and managerial control, and apply this profits-over-safety model, at the following facilities in the State of Ohio:

a. Broadview Multi-Care Center
5520 Broadview Road
Parma, OH 44134

b. Cedarwood Plaza
12504 Cedar Road
Cleveland Heights, OH 44106

c. Franklin Plaza
3600 Franklin Boulevard
Cleveland, OH 44113

d. Hillside Plaza
18220 Euclid Avenue
Cleveland, OH 44112

e. Mapleview Country Villa
775 South Street
Chardon, OH 44024

f. Orchard Villa
2841 Munding Drive
Oregon, OH 43616

g. Parkside Villa
7040 Hepburn Road
Middleburg Heights, OH 44130

h. Pleasantview Care Center
7377 Ridge Road
Parma, OH 44129

i. Wickliffe Country Place
1919 Bishop Road
Wickliffe, OH 44092

71. The Pleasant Lake Defendants profits-over-safety model and systemic understaffing, applied across the entire chain of nursing homes owned and operated by the Pleasant Lake Defendants, has resulted in an average ranking of "2.2-star" ranking for

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Staffing across all the Defendants' nursing homes on Medicare.gov Nursing Home Compare website.



According to the Centers for Medicare and Medicaid, the Legacy Health Services chain of nursing homes average a "2.2-star" rating for Staffing – below the national average of 2.9 stars. This data was taken directly from medicare.gov on October 19, 2026.

Reporting Data – Nursing Home

72. The Pleasant Lake Defendants are required to report significant amounts of data to the federal agency that oversees operations of nursing homes receiving federal or state funding, the Centers for Medicare and Medicaid Services, or "Medicare."

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73. The data the Pleasant Lake Defendants submit to Medicare regarding its facility includes data on its residents (numbers, care needs, and bed days), its finances, and its nurse and nursing aide staffing levels as compared to resident care needs.

74. This data is certified correct by the Pleasant Lake Defendants and / or submitted under penalty of perjury and / or civil or criminal penalties.

75. Medicare uses some of this data submitted by Pleasant Lake Defendants to produce its nursing home 5-star rating system, also known as "Nursing Home Compare."

76. The Pleasant Lake Defendants and Red Flag Reporting entered into an agreement to increase the Quality Measures and Health Inspections scores of the Facility and the other facilities in the chain operated by Pleasant Lake Defendants. This agreement included a "catch and kill" scheme of funneling complaints of residents of the Pleasant Lake Defendants' facilities and their family to Red Flag Reporting instead of the Ohio Department of Health.

77. This scheme was in place at the Facility during Donata Rahne's admission from March 25, 2025, through November 10, 2025, and in fact led to the June 26, 2025, complaint of the family of Donata Rahne being funneled to Red Flag Reporting instead of the Ohio Department of Health.

78. This scheme was intended by Defendants to avoid inspections by the Ohio Department of Health and mandatory reporting by the facilities which would negatively impact the Medicare Compare star ratings of the facilities – including the Facility where Donata Rahne was admitted.

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Nursing Home Resident Care Needs and Staffing Levels (MDS and PDPM Scores)

79. Every nursing home receiving Medicare or Medicaid funding—the clear majority of nursing homes, including Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. and others operated and / or controlled by Defendants—is required to provide detailed information regarding the health status, care and treatment, and services provided to each resident in the facility using a questionnaire called the Minimum Data Set, or MDS. This evaluation is done for all nursing home residents regardless of whether their care is being paid for by Medicare.

80. Nursing homes like Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. are required to evaluate every resident using the Minimum Data Set questionnaire shortly after the time of admission, every 90 days thereafter, when a resident has a significant improvement or decline in health (physical, mental, or psychosocial), and upon discharge.

81. Based on this Minimum Data Set, each resident's individual care needs (called "acuity level") are assigned into a group signifying how much nursing or staff care the resident requires, called a Patient-Driven Payment Model score, or PDPM score. The PDPM score is calculated for physical therapy, occupational therapy, speech-language pathology, non-therapy ancillary services, and nursing services.

82. Each resident's PDPM score for nursing services is contained in the patient's Minimum Data Set evaluations, meaning the total nursing care needs of the residents in any facility at a specific time is available by totaling the residents' PDPM scores from various sections of the Minimum Data Set evaluations corresponding to increased needs for nursing care.

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83. When these PDPM scores are combined for all residents in a nursing home facility, the nursing home knows exactly how many minutes of nursing and nursing aide care should be provided, on average, to meet the expected care needs of their residents.

Misleading Advertising

84. In an effort to persuade the families of patients to become customers, Pleasant Lake Defendants make promises to the families of such potential residents that they will provide a level of care that they know they are incapable of providing.

85. The intent and outcome of this misleading practice is to cause residents, their families, and external care providers to believe the nursing facility is much better staffed to provide the promised care than what is actually the practice of the Pleasant Lake Defendants with regard to staffing the Facility.

86. The intent and outcome of this misleading practice is to drastically limit the budget and overhead needed to run a safe facility in order to maximize profits and siphon resources at the expense of patient safety.

Systemic Understaffing and Donata Rahne's Care

87. Pleasant Lake Defendants failed to ensure, through their operational, budgetary, consultation and managerial decisions and actions, that Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. was sufficiently staffed, and the staff appropriately trained and informed, to meet the individual needs of Donata Rahne during the period she was a resident at the facility.

88. Pleasant Lake Defendants engaged in a systemic practice to understaff Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. to maximize profits at the expense of its residents' care.

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89. This lack of sufficient staff directly resulted in Donata Rahne not receiving basic and necessary services, assessments, and interventions to prevent, among other things, neglect leading to her injuries at Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc. during the period she was a resident at the Facility.

Defendants' Negligence and Recklessness with Donata Rahne

90. Pleasant Lake Defendants accepted Donata Rahne as a nursing home resident for rehabilitation and skilled nursing care on March 26, 2025.

91. Pleasant Lake Defendants agreed to accept Donata Rahne into their facility and provide care to her in exchange for monetary payment.

92. The Pleasant Lake Defendants knew Donata Rahne was at risk for developing pressure injuries, was incontinent, and needed staff assistance to move in bed and transfer when it accepted her into its care upon admission.

93. Donata Rahne was admitted to the Facility on March 26, 2025, for rehabilitation and skilled nursing care following a hospitalization and surgery to repair a broken femur in her left leg.

94. Over the following seven and a half months, the Pleasant Lake Defendants allowed Donata Rahne to develop multiple pressure injuries, including unstageable pressure injuries on both of her heels and a Stage 4 pressure injury on her sacrum that became infected.

95. Donata Rahne's family reported concerns about her care to the Defendants through Red Flag Reporting, and the Defendants failed to address those concerns.

96. Donata Rahne suffered a continuous decline after developing the infected pressure injuries caused by the Pleasant Lake Defendants, and she developed sepsis.

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97. Donata Rahne endured mental and physical pain and suffering and death as a direct and proximate result of Pleasant Lake Defendants' failure to provide adequate care due to understaffing the facility.

FIRST CAUSE OF ACTION
(MEDICAL NEGLIGENCE / RECKLESSNESS)

98. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

99. Donata Rahne depended on the Pleasant Lake Defendants, and their respective nursing and medical staff, for medical and nursing care, treatment, evaluation, and assistance.

100. The Pleasant Lake Defendants had a duty to provide proper care and treatment to Donata Rahne and to avoid causing injury to Donata Rahne.

101. The Pleasant Lake Defendants, including their medical and nursing staff, failed to provide proper care and treatment to Donata Rahne, which they knew or should have known they required, and their negligence was the direct and proximate cause of the injuries that Donata Rahne suffered.

102. The Pleasant Lake Defendants' failure to provide proper care and treatment included, but is not limited to:

a. Choosing to put inadequate prevention and response interventions in place to prevent injuries;

b. Choosing to provide inadequate resident observation, supervision, and monitoring;

c. Choosing to provide improper training to staff members regarding resident monitoring, assessment, response, and treatment;

d. Choosing to provide too few and / or underqualified nursing staff members for resident needs at each facility to protect and provide adequate care to residents like Donata Rahne;

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e. Choosing not to provide accurate, adequate, or timely information to Donata Rahne's family;

f. Choosing to provide inadequate supervision to prevent accidents and falls;

g. Choosing to violate orders relating to the care of Donata Rahne;

h. Choosing to violate state and federal regulations governing care and staffing levels in nursing home facilities by which residents like Donata Rahne are a member of the class of persons intended to be protected from injuries like those she suffered;

i. Failing to ensure the rights and safety of its residents, including Donata Rahne, as required by Ohio and federal regulations;

j. Choosing not to provide appropriate care to Donata Rahne while she was a resident of the Facility; and

k. Such other acts or omissions described in this Complaint or discovered in litigation.

103. These actions constituted a conscious disregard for Donata Rahne's rights and safety with a great probability of causing substantial harm from this misconduct, by which—through heedless indifference to the consequences—the Pleasant Lake Defendants or their staff disregarded a substantial and unjustifiable risk that the health care provider's conduct was likely to cause, at the time those services or that treatment or care were rendered, constituting an unreasonable risk of injury, death, or loss to person or property, or intentional misconduct or willful or wanton misconduct. The Pleasant Lake Defendants were aware of the great probability of the harm that could result from their willful, wanton, and/or reckless misconduct.

104. The Pleasant Lake Defendants' disregard for the rights and safety of residents like Donata Rahne created circumstances under which it became substantially certain that serious injuries would result, entitling Plaintiff to awards for compensatory and punitive damages.

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105. The Pleasant Lake Defendants' are directly liable for their own willful, wanton, and/or reckless misconduct.

106. The Pleasant Lake Defendants are also vicariously liable for their employees' and agents' willful, wanton, and/or reckless misconduct.

107. The Pleasant Lake Defendants and their medical and nursing staff provided care to Donata Rahne that fell below the standard of care expected of medical care and nursing home organizations, under the same or similar circumstances.

108. The departures from the standard of care are evidenced by violations of sections of Federal Regulations, 42 C.F.R. § 483 et seq., and Ohio Administrative Code sections, OAC 3701-17 et seq., and the Ohio Resident's Rights Law, R.C. section 3721.13.

109. As a direct and proximate result of the negligent and/or willful, wanton and/or reckless actions of the Pleasant Lake Defendants described above, Donata Rahne sustained permanent injury and loss including, but not limited to, conscious pain and suffering, disability, and death.

110. WHEREFORE, Plaintiff demands judgment against the Pleasant Lake Defendants, jointly, in an amount more than Twenty-Five Thousand Dollars ($25,000.00), for conscious pain and suffering, loss of enjoyment, together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the Plaintiff may be entitled to and/or that the court finds is appropriate and/or equitable.

SECOND CAUSE OF ACTION
(NEGLIGENCE)

111. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

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112. Donata Rahne and her family depended on the Defendants, including Red Flag Reporting, to receive, investigate, and respond to complaints and grievances regarding her care.

113. The Defendants, including Red Flag Reporting, which undertook to receive and handle complaints regarding the care of residents at the Facility, had a duty to exercise reasonable care in receiving, documenting, investigating, responding to, and resolving complaints and grievances regarding Donata Rahne's care, and to avoid causing injury to Donata Rahne.

114. The Defendants, including Red Flag Reporting, failed to exercise reasonable care in handling complaints and grievances regarding Donata Rahne's care, which they knew or should have known was necessary for her protection, and their negligence was the direct and proximate cause of the injuries that Donata Rahne suffered.

115. The Defendants' failure to exercise reasonable care included, but is not limited to:

a. Choosing to route complaints about resident care through a reporting system designed to protect the Defendants' "assets and reputation" rather than residents;

b. Choosing not to deliver or escalate complaints regarding Donata Rahne's care to the Facility's Administrator, Director of Nursing, Grievance Official, or other persons with authority to act on them;

c. Choosing not to enter complaints regarding Donata Rahne's care into the Facility's grievance process, her medical record, or her care plan;

d. Choosing not to investigate complaints regarding Donata Rahne's care or take immediate action to prevent further harm;

e. Choosing not to provide a written grievance decision or any response to Donata Rahne or her family;

f. Choosing not to ensure Donata Rahne was gotten out of bed, repositioned, and offloaded as ordered after being notified that this care was not being provided;

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g. Choosing not to inform Donata Rahne's family of their right to file grievances with the Ohio Department of Health and the State Long-Term Care Ombudsman;

h. Choosing to provide inadequate staffing, training, and supervision for the handling of complaints and grievances;

i. Choosing to keep complaints about resident care from regulators to avoid investigation, citation, and lower ratings;

j. Choosing to interfere with Donata Rahne's right to voice grievances as required by Ohio and federal regulations; and

k. Such other acts or omissions described in this Complaint or discovered in litigation.

116. These actions constituted a conscious disregard for Donata Rahne's rights and safety with a great probability of causing substantial harm from this misconduct, by which—through heedless indifference to the consequences—the Defendants or their staff disregarded a substantial and unjustifiable risk that their conduct was likely to cause an unreasonable risk of injury, death, or loss to person or property, or intentional misconduct or willful or wanton misconduct. The Defendants were aware of the great probability of the harm that could result from their willful, wanton, and/or reckless misconduct.

117. The Defendants' disregard for the rights and safety of residents like Donata Rahne created circumstances under which it became substantially certain that serious injuries would result, entitling Plaintiff to awards for compensatory and punitive damages.

118. The Defendants are directly liable for their own willful, wanton, and/or reckless misconduct.

119. The Defendants are also vicariously liable for their employees' and agents' willful, wanton, and/or reckless misconduct.

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120. The Defendants provided services to Donata Rahne that fell below the duty of care expected under the same or similar circumstances.

121. As a direct and proximate result of the negligent and/or willful, wanton and/or reckless actions of the Defendants described above, Donata Rahne sustained permanent injury and loss including, but not limited to, conscious pain and suffering, disability, and death.

122. WHEREFORE, Plaintiff demands judgment against the Defendants, jointly, in an amount more than Twenty-Five Thousand Dollars ($25,000.00), for conscious pain and suffering, loss of enjoyment, together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the Plaintiff may be entitled to and/or that the court finds is appropriate and/or equitable.

THIRD CAUSE OF ACTION
(WRONGFUL DEATH)

123. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

124. Donata Rahne depended on the Pleasant Lake Defendants, and their respective nursing and medical staff, for medical and nursing care, treatment, evaluation, and assistance.

125. The Pleasant Lake Defendants had a duty to provide proper care and treatment to Donata Rahne and to avoid causing injury to Donata Rahne.

126. The Pleasant Lake Defendants, including their medical and nursing staff, failed to provide proper care and treatment to Donata Rahne, which they knew or should have known she required, and their negligence was the direct and proximate cause of the injuries that Donata Rahne suffered.

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127. The Pleasant Lake Defendants' failure to provide proper care and treatment included, but is not limited to:

a. Choosing to put inadequate prevention and response interventions in place to prevent injuries;

b. Choosing to provide inadequate resident observation, supervision, and monitoring;

c. Choosing to provide improper training to staff members regarding resident monitoring, assessment, response, and treatment;

d. Choosing to provide too few, and / or underqualified nursing staff members for resident needs at each facility to protect and provide adequate care to residents like Donata Rahne;

e. Choosing not to provide accurate, adequate, or timely information to Donata Rahne's family;

f. Choosing to provide inadequate supervision to prevent accidents and falls;

g. Choosing to violate orders relating to care of Donata Rahne;

h. Choosing to violate state and federal regulations governing care and staffing levels in nursing home facilities by which residents like Donata Rahne are a member of the class of persons intended to be protected from injuries like those she suffered;

i. Failing to ensure the rights and safety of its residents, including Donata Rahne, as required by Ohio and federal regulations;

j. Choosing not to provide appropriate care to Donata Rahne while she was a resident of the Facility; and

k. Such other acts or omissions described in this Complaint or discovered in litigation.

128. Defendants, directly or through their employees or agents, violated Donata Rahne's rights as a resident of the Pleasant Lake Defendants' facilities, as enumerated in Ohio Revised Code section 3721.13, including, but not limited to:

a. The right to a safe and clean living environment;

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b. The right to be free from physical, verbal, mental, and emotional abuse and to be treated at all times with courtesy, respect, and full recognition of dignity and individuality;

c. The right to adequate and appropriate medical treatment and nursing care and to other ancillary services that comprise necessary and appropriate care;

d. The right to have clothes and bed sheets changed as the need arises, to ensure the resident's comfort or sanitation;

e. The right to participate in decisions that affect the resident's life;

f. The right to have any significant change in the resident's health status reported to the resident's sponsor.

g. The right to voice grievances and recommend changes in policies and services to the home's staff, to employees of the department of health, or to other persons not associated with the operation of the home, of the resident's choice, free from restraint, interference, coercion, discrimination, or reprisal, including access to a residents' rights advocate.

129. The Defendants, including Red Flag Reporting, failed to exercise reasonable care in handling complaints and grievances regarding Donata Rahne's care, which they knew or should have known was necessary for her protection, and their negligence was the direct and proximate cause of the injuries that Donata Rahne suffered.

130. The Defendants' failure to exercise reasonable care included, but is not limited to:

a. Choosing to route complaints about resident care through a reporting system designed to protect the Defendants' "assets and reputation" rather than residents;

b. Choosing not to deliver or escalate complaints regarding Donata Rahne's care to the Facility's Administrator, Director of Nursing, Grievance Official, or other persons with authority to act on them;

c. Choosing not to enter complaints regarding Donata Rahne's care into the Facility's grievance process, her medical record, or her care plan;

d. Choosing not to investigate complaints regarding Donata Rahne's care or take immediate action to prevent further harm;

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e. Choosing not to provide a written grievance decision or any response to Donata Rahne or her family;

f. Choosing not to ensure Donata Rahne was gotten out of bed, repositioned, and offloaded as ordered after being notified that this care was not being provided;

g. Choosing not to inform Donata Rahne's family of their right to file grievances with the Ohio Department of Health and the State Long-Term Care Ombudsman;

h. Choosing to provide inadequate staffing, training, and supervision for the handling of complaints and grievances;

i. Choosing to keep complaints about resident care from regulators to avoid investigation, citation, and lower ratings;

j. Choosing to interfere with Donata Rahne's right to voice grievances as required by Ohio and federal regulations; and

k. Such other acts or omissions described in this Complaint or discovered in litigation.

131. These violations are evidence of negligence and conscious disregard of Donata Rahne's rights and safety, and give rise to a statutory cause of action.

132. Donata Rahne endured conscious pain, suffering, and disability, and other harms and losses as the direct and proximate result of Defendants' violations of R.C. 3721.13.

133. These actions constituted a conscious disregard for Donata Rahne's rights and safety with a great probability of causing substantial harm from this misconduct, by which—through heedless indifference to the consequences—the Defendants or their staff disregarded a substantial and unjustifiable risk that the health care provider's conduct was likely to cause, at the time those services or that treatment or care were rendered, constituting an unreasonable risk of injury, death, or loss to person or property, or intentional misconduct or willful or wanton misconduct.

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134. The Defendants were aware of the great probability of the harm that could result from their willful, wanton, and/or reckless misconduct.

135. The Defendants' disregard for the rights and safety of residents like Donata Rahne created circumstances under which it became substantially certain that serious injuries would result.

136. The Defendants are directly liable for their own willful, wanton, and/or reckless misconduct.

137. The Defendants are also vicariously liable for their employees' and agents' willful, wanton, and/or reckless misconduct.

138. The Pleasant Lake Defendants and their medical and nursing staff provided care to Donata Rahne that fell below the standard of care expected of medical care and nursing home organizations, under the same or similar circumstances.

139. The departures from the standard of care are evidenced by violations of sections of Federal Regulations, 42 C.F.R. § 483 et seq., and Ohio Administrative Code sections, OAC 3701-17 et seq., and the Ohio Resident's Rights Law, R.C. section 3721.13.

140. As a direct and proximate result of the negligence / recklessness described above, Donata Rahne sustained injuries that caused her untimely and wrongful death.

141. Donata Rahne's next-of-kin suffered damages as set forth in the Ohio Wrongful Death statute, R.C. 2125.01 et seq., including mental anguish and grief and loss of Decedent's society and companionship.

142. WHEREFORE, Plaintiff demands judgment against Defendants, in an amount more than $25,000.00 to compensate the decedent's next of kin and heirs at law, together with costs of suit, attorneys' fees and expenses, and any other relief the court finds is appropriate and / or equitable.

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FOURTH CAUSE OF ACTION
(NURSING HOME RESIDENT RIGHTS VIOLATION R.C. 3721.13)

143. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

144. Defendants, directly or through their employees or agents, violated Donata Rahne's rights as a resident of the Defendants' facilities, as enumerated in Ohio Revised Code section 3721.13, including, but not limited to:

a. The right to a safe and clean living environment;

b. The right to be free from physical, verbal, mental, and emotional abuse and to be treated at all times with courtesy, respect, and full recognition of dignity and individuality;

c. The right to adequate and appropriate medical treatment and nursing care and to other ancillary services that comprise necessary and appropriate care;

d. The right to have clothes and bed sheets changed as the need arises, to ensure the resident's comfort or sanitation;

e. The right to participate in decisions that affect the resident's life;

f. The right to have any significant change in the resident's health status reported to the resident's sponsor.

g. The right to voice grievances and recommend changes in policies and services to the home's staff, to employees of the department of health, or to other persons not associated with the operation of the home, of the resident's choice, free from restraint, interference, coercion, discrimination, or reprisal, including access to a residents' rights advocate.

145. These violations are evidence of negligence and conscious disregard of Donata Rahne's rights and safety and give rise to a statutory cause of action.

146. As a direct and proximate result of Defendants' violations of R.C. 3721.13, Donata Rahne suffered conscious pain, suffering, and disability, and other harms and losses, including death.

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147. WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly, in an amount in excess of $25,000.00, together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the court finds is appropriate and / or equitable.

FIFTH CAUSE OF ACTION
(CIVIL CONSPIRACY)

148. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

149. The Pleasant Lake Defendants had an express agreement, mutual understanding, or tacit agreement to, and/or their agents maliciously combined efforts to:

a. defraud residents and their families by delivering wholly inadequate care, contrary to their promises;

b. systemically understaff their facilities in violation of federal regulations, and for the purposes of their own profit, at the expense of resident health and safety;

c. under-capitalize the facilities and siphon money to themselves and related entities for the purposes of their own profit at the expense of resident health and safety;

d. inflate resident PDPM levels to obtain excessive and unjustified payments from Medicare and Medicaid while not providing the care paid for with these taxpayer dollars;

e. not provide the level of care, by understaffing the facility, paid for by taxpayer dollars;

f. misrepresenting to Medicare the staffing level of the facility to increase their rating; and

g. as otherwise may be described in the Complaint or learned through discovery.

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150. The Defendants created a "catch and kill" scheme to funnel complaints of the Facility's residents and their family, including Donata Rahne, away from the Ohio Department of Health and to Defendant Red Flag Reporting instead.

151. The Defendants intended the "catch and kill" scheme to avoid government inspections of the Facility and other facilities operated by the Pleasant Lakes Defendants, and prevent any negative impact on these facilities' Medicare Compare star ratings.

152. In enacting the "catch and kill" scheme, the Defendants had an express agreement, mutual understanding, or tacit agreement to, and/or their agents maliciously combined efforts to:

a. Route complaints about resident care through a reporting system designed to protect the Defendants' "assets and reputation" rather than residents;

b. Fail to deliver or escalate complaints regarding residents' care, including Donata Rahne's care, to the Facility's Administrator, Director of Nursing, Grievance Official, or other persons with authority to act on them;

c. Direct residents' complaints regarding care, including Donata Rahne's complaints about her care, away from the Facility's grievance process, the residents' medical records, or the residents' care plan;

d. Lead residents and their family, including Donata Rahne and her family, to believe Defendants would investigate complaints regarding resident care and/or take immediate action to prevent further harm, but in truth had no intention to ever investigate and/or take immediate action;

e. Never provide a written grievance decision or any response to residents' complaints, including the complaints of Donata Rahne and her family;

f. Mislead residents and their families, including Donata Rahne and her family, to believe they had exercised their right to file grievances with the Ohio Department of Health and the State Long-Term Care Ombudsman;

g. Keep complaints about resident care from regulators to avoid investigation, citation, and lower ratings;

h. Interfering with and frustrating completely residents' right to voice grievances as required by Ohio and federal regulations, including the right of Donata Rahne to do so; and

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i. Such other acts or omissions described in this Complaint or discovered in litigation.

153. This understanding constitutes a malicious combination to injure residents of the Facility, including Donata Rahne.

154. In pursuance of this common plan or design to commit tortious acts, the Defendants actively took part in it, or furthered it by cooperation or request, or lent aid or encouragement to the wrongdoers, or ratified and adopted the wrongdoers' acts done for their benefit.

155. The conspiracy caused injury to Donata Rahne.

156. WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly, in an amount in excess of $25,000.00, together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the court finds is appropriate and / or equitable.

SIXTH CAUSE OF ACTION
(FRAUD)

157. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

158. Pleasant Lakes Defendants concealed facts concerning their staffing levels, pay, and the amount of care they were actually capable of providing at Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc.

159. Not only did the Pleasant Lakes Defendants conceal this information, but they publicly and privately represented that they provide exceptional services in an effort to induce the family of Donata Rahne and other potential customers to place their loved ones in their care and custody.

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160. Defendants created a "catch and kill" scheme to induce residents of Pleasant Lake Villa Skilled Nursing & Rehabilitation aka Pleasant Lake Nursing Home, Inc., and their family into submitting complaints and/or grievances to Red Flag Reporting, while misleading residents and their family to believe they had submitted complaints and/or grievances to state authorities.

161. Defendants concealed that the complaints and/or grievances in fact had gone to a private for-profit organization – Red Flag Reporting – with no intention of taking any corrective action on the complaints and/or grievances.

162. Defendants' actions were intended to avoid – and in fact did avoid – government inspections of the Facility and other facilities operated by the Pleasant Lakes Defendants, and prevent any negative impact on these facilities' Medicare Compare star ratings.

163. In combination with the concealed facts concerning their staffing levels, pay, and the amount of care they were actually capable, the actions of the Defendants in adopting and furthering the "catch and kill" scheme allowed Defendants to induce potential residents and their families, including the family of Donata Rahne, to place their loved ones at the Facility for care premised on Defendants' representations about the safety of the facility which Defendants knew were false.

164. These inducements were made falsely, with knowledge of their falsity, or with such utter disregard and recklessness as to whether they were true or false that knowledge may be inferred with the intent of misleading Donata Rahne's family and other potential customers into placing their loved ones in the care and custody of Defendants.

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165. Donata Rahne's family and the family members of other potential customers reasonably relied on Defendants' representations and concealments regarding the degree of care they provide and the safety of the facility.

166. The result of these inducements and concealments was that Donata Rahne's family, and the family of numerous other residents, allowed their loved one to be placed in Defendants' facility.

167. As a direct and proximate result of Defendants' actions, representations, and concealments, Donata Rahne suffered conscious pain and suffering and death.

168. As a direct and proximate result of Defendants' action, representations, and concealments, Donata Rahne's next-of-kin have experienced harms and losses as a result of their death, including those damages set forth in Ohio's wrongful death statute, Ohio Revised Code section 2125.02 *et seq.*

169. WHEREFORE, Plaintiff demands judgment against the Defendants, jointly, in an amount in excess of Twenty-Five Thousand Dollars ($25,000.00), together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the court finds is appropriate and/or equitable.

A TRIAL BY JURY IS HEREBY DEMANDED

Respectfully Submitted,

/s/ Matthew A. Mooney

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Counsel for Plaintiff

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STATE OF OHIO)
) **AFFIDAVIT OF MERIT**
CUYAHOGA COUNTY)

Affiant KAPIL GULATI, MD, having been first duly sworn, states:

1. I am an adult, have no known disability preventing my truthful testimony, and have personal knowledge of the matters contained within this affidavit.

2. I am a full-time practicing physician in the field of Internal Medicine, licensed in the state of Ohio, board certified in Internal Medicine, spending more than 50% of my professional time providing direct patient care.

3. Through my specialized knowledge, skill, training, experience, and education, I am familiar with the standard of care applicable to the medical and nursing care and treatment that was provided to Donata Rahne while a resident of Pleasantview Care Center aka Pleasant Lake Nursing Home, Inc., Legacy Health Services aka DMD Management, Inc., OH 10 HOLDCO, LLC, CC OH10 OPCO, LLC, CHAVOS221 HOLDINGS, LLC, LIONSVIEW OPCO NR, LLC, LIONSVIEW SC, LLC, LIVING26 HOLDINGS, LLC, SAPPHIRE143 HOLDINGS, LLC, and Pleasant Lake Associates, LLC, and Red Flag Reporting aka RFR Resources, LLC.

4. I have reviewed all medical records reasonably available to the Estate of Donata Rahne, Deceased concerning the allegations contained in the complaint.

5. To a reasonable degree of medical probability, the Defendants Pleasantview Care Center aka Pleasant Lake Nursing Home, Inc., Legacy Health Services aka DMD Management, Inc., OH 10 HOLDCO, LLC, CC OH10 OPCO, LLC, CHAVOS221 HOLDINGS, LLC, LIONSVIEW OPCO NR, LLC, LIONSVIEW SC, LLC, LIVING26 HOLDINGS, LLC, SAPPHIRE143 HOLDINGS, LLC, and Pleasant Lake Associates, LLC, and Red Flag Reporting aka RFR Resources, LLC, breached the standard of care and the breach caused Donata Rahne's injuries and death.

FURTHER AFFIANT SAYETH NAUGHT.

Kapil Gulati
KAPIL GULATI, MD

SWORN TO BEFORE ME and subscribed in my presence this 29th day of September, 2026.

NOTARY PUBLIC
Beth Dvorak
My commission has expiration
pursuant to RC §147.03

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