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**COMMONWEALTH OF KENTUCKY
FLOYD CIRCUIT COURT
DIVISION NO. _____
CIVIL ACTION NO.: _____**

KRISTY STILTNER

PLAINTIFF

VS.

**MOUNTAIN COMPREHENSIVE CARE CENTER, INC, and
MOUNTAIN PLUS SERVICES, INC.**

DEFENDANTS

**Serve: Mountain Comprehensive Care Center, Inc.
Agent for Service of Process:
Mountain Comprehensive Care Center, Inc.
Registered Agent: Promod Bishnoi
104 South Front Street
Prestonsburg, KY 41653**

**Mountain Plus Services, Inc.
Agent for Service of Process:
Mountain Plus Services, Inc.
Registered Agent: Promod Bishnoi
104 South Front Street
Prestonsburg, KY 41653**

VERIFIED COMPLAINT

Comes now the Plaintiff, Kristy Stiltner, by and through counsel, and for her Verified Complaint, and causes of action against Mountain Comprehensive Care Center, Inc., hereinafter referred to as "MCCC" and Mountain Plus Services, Inc., hereinafter referred to as "MPS", stated as follows:

1. That the Plaintiff, Kristy Stiltner, is a resident of Van Lear, Johnson County, Kentucky, 41265.
2. That the Defendant, MCCC is a Kentucky Corporation providing health services and other services with its principal office located at 104 South Front Street, Prestonsburg, Kentucky, 41653, with its Agent for Service of Process being Mountain

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Comprehensive Care Center, Inc., Registered Agent: Promod Bishnoi, 104 South Front Street, Prestonsburg, Kentucky, 41653.

3. That the Defendant, MPS is a Kentucky Corporation providing health services and other services with its principal office located at 104 South Front Street, Prestonsburg, Kentucky 41653, with its Agent for Service of Process being Mountain Plus Services, Inc., Registered Agent: Promod Bishnoi, 104 South Front Street, Prestonsburg, Kentucky 41653.

4. That the Plaintiff, Kristy Stiltner was an employee of Defendant, MCCC for twenty two (22) years and was also an employee of MPS for a certain term and the Plaintiff has received wages by "paycheck" from MPS during the course of her employment. That the Plaintiff's employment with the Defendants, MCCC and MPS, ceased on or about April 23rd, 2025.

5. Venue and jurisdiction of this action are proper in the Floyd Circuit Court, as the causes of action set forth herein arose in Floyd County, Kentucky, and as the domicile and principal place of business of the Defendants is Floyd County, Kentucky.

6. That the Plaintiff was directed by the Defendants, her employers, MCCC and MPS, including those individuals who are also employees of the Defendants, including their CEO, Promod Bishnoi, through channels, originating with administration to bill for services under FQHC locations to increase revenue even when the services provided took place in a different location; Plaintiff was directed by the CEO to refrain from engaging Medicaid/Medicare for inquiries or clarification concerning charges identified by the CEO as billable; being instructed by the CEO to submit TRP services under the credentials of a licensed provider in order to obtain a higher reimbursement rate, despite the fact the services were not rendered by a licensed provider; telling staff to bill a certain amount of services per client, regardless if the services were necessary or warranted and that same doesn't comply with established guidelines and said acts violated KRS 205.846 whereby Defendant's are liable for Plaintiffs retaliation.

7. On April 23rd, 2025, Plaintiff's employment with the Defendants, MCCC and MPS, as their Mental Health Director.

8. That the Plaintiff's employers retaliated against her for failing to follow the

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directions stated above by placing the Plaintiff in a hostile work environment until her termination.

9. That said retaliation violated KRS 216B.165, which provides that the Plaintiff having knowledge of and having reported to the Board of Directors for MCCC that the quality of care of the Defendant's patient/client, and their safety, and/or safety of the healthcare facilities, or services having been placed in jeopardy and having made an oral and/or written report of the above stated matters, issues, violations of the Defendants duty as a healthcare facility, Et al. to "her supervisor", the CEO and the Board of Directors of the Defendants, MCCC and MPS, whereby the Defendants had retaliated against the Plaintiff as set forth herein which violated KRS 216B.165 and KRS 205.8465 which amounted to retaliation against the Plaintiff for her reporting as set forth above in direct violation of said statuses.

10. That the Plaintiff was terminated from her employment with the Defendants communicated by the CEO stating "this just isn't working out".

11. That prior to her termination, the Plaintiff had received excellent job performance reviews, received promotions, pay raises and had not received any prior disciplinary action by the Defendants.

12. That the Defendants' actions set forth herein, including violations of the statutes KRS 216B.265 and KRS 205.8465, et seq referred to herein were contrary to a fundamental and well-defined public policy, as evidenced by the above cited statutory provisions, and accordingly, the Defendants are jointly and/or severally liable to the Plaintiff for her damages for common law wrongful termination as a result. That the Plaintiff reported certain actions on the part of certain individuals including the CEO, Promod Bishnoi, which violate KRS 205.8465 and 216B.165 and that these are set forth herein.

13. That the Defendants, by way of retaliation prior to her termination, subjected her to a mentally and physically hostile work environment, causing her to develop medical problems, caused by the stress that she was under, created by her employers, unlawfully and maliciously.

14. That the Defendants' efforts to remove the Plaintiff from her employment

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with MCCC and MPS, were unsuccessful up to her termination, and for purposes of furthering an objective, which was fraudulent and financial in nature, and which compromised the health and safety of the patients/clients of the Defendants, MCCC and MPS, that said acts were in direct violation of KRS 216B.165 and 205.8465 and common law wrongful termination and entitling the Plaintiff to damages including punitive damages pursuant to KRS 446.070.

15. That the Plaintiff, as set forth herein, was subjected by the Defendants to a hostile work environment, and was otherwise treated in a manner, entitling the Plaintiff to an award of punitive damages under KRS 411.184 against the Defendants jointly and/or severally whose actions and violations of said statutes were malicious, fraudulent and/or oppressive and in violation of Kentucky Common Law consistent with proof to be offered in this case with said punitive damages exceeding the minimum dollar amount necessary to vest jurisdiction of this case in the Floyd Circuit Court.

16. That the Defendants' conduct against the Plaintiff described above, as set forth herein, has directly, and/or proximately caused the Plaintiff to incur, and suffer damages, consisting of past, present, and future, emotional, physical, and mental, pain, suffering and anguish, medical bills, lost wages including retirement and other employee benefits, attorney's fees and pre-judgment and post-judgment interest, costs, and she is entitled to punitive damages, based upon the Defendants' conduct toward her, as set forth above, all and each of which is in excess of the minimum dollar amount necessary to vest jurisdiction of this case in the Floyd Circuit Court.

WHEREFORE, the Plaintiff respectfully demands judgment against the Defendants, jointly and/or severally, as follows:

1. That Plaintiff be awarded judgment against the Defendants jointly and/or severally, for past, present and future mental and physical pain, suffering and anguish, emotional distress, lost wages, medical and hospital bills, retirement and other employee benefits, pre-judgment and post-judgment interest, costs, attorney's fees and punitive damages in excess of the minimum dollar amount necessary to vest jurisdiction of this case in Floyd Circuit Court for the Defendants' actions set forth above;

2. That all of the Plaintiff's damages for each and every cause of action set

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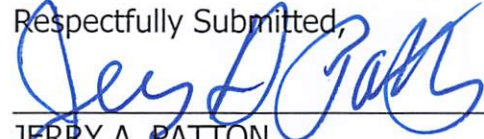
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forth herein exceed the minimum jurisdictional amount of the Floyd Circuit Court;

- 3. That the Plaintiff be awarded all attorney's fees and costs;
- 4. That this case receive a trial by jury; and
- 5. That the Plaintiff be awarded any and all other appropriate relief.

Respectfully Submitted,



JERRY A. PATTON
 Jerry A. Patton, PSC
 Attorney for Plaintiff
 252 East Court Street
 Prestonsburg, KY 41653
 Telephone No.: (606) 886-1779
 Facsimile No.: (606) 886-3005
jerry@jerrypattonlaw.com

VERIFICATION

I, Kristy Stiltner, the Plaintiff in the above styled case, being first duly sworn, have read the foregoing Verified Complaint, and verify that it is true and accurate to the best of my knowledge, information and belief.


 KRISTY STILTNER

COMMONWEALTH OF KENTUCKY
COUNTY OF Floyd

Subscribed and sworn to before me by Kristy Stiltner to be her free act and deed, on this the 30th day of April 2026.


 NOTARY PUBLIC

June 20, 2029
 MY COMMISSION EXPIRES

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

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