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COMMONWEALTH OF KENTUCKY  
FLOYD CIRCUIT COURT  
DIVISION NO. \_\_\_\_\_  
CIVIL ACTION NO.: \_\_\_\_\_

REBECKAH HALL

PLAINTIFF

VS.

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

Serve : Mountain Comprehensive Care Center  
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

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VERIFIED COMPLAINT

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Comes now the Plaintiff, Rebeckah Hall, 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", states as follows:

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000001 of 000011

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02/18/2026 09:36:54 AM  
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1. That the Plaintiff, Rebeckah Hall, is a resident of Prestonsburg, Floyd County, Kentucky 41653.

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

3. That the Defendant, Mountain Plus Services, Inc., (MSP) 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 and the Defendant, MPS is liable to the Plaintiff for any and all of the causes of action set forth herein against MCCC as there substantial evidence the Plaintiff was also an employee of not only MCCC but MSP, at all times stated herein as well and accordingly

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000002 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
KY BROADCASTING

MPS is jointly and/or severely reliable for any and all causes of action and damages set forth herein.

4. That the Plaintiff, Rebeckah Hall was an employee of Defendant, MCCC for twenty six (26) 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 December 5th, 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 location to increase revenue even when the services provided took place in a different location; [the untruthfulness and withholding

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000003 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
EKYBROADCASTING

of a requested list of approved billable locations under the FQHC], 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 TPR 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; the CEO prevented the billing department from setting up correct billing codes that changed following the Covid pandemic to reflect the services that were provided as "audio only"; following the creation of the Audit Department, it was instructed by the CEO to change billing locations despite being informed by the Financial and Billing Departments that same doesn't comply with established guidelines said acts violated KRS 205.8465.

7. That the Plaintiff during a certain period of time was employed by MPS and she was employed by MCCC, but on December 5th, 2025, when her employment with the Defendant, MCCC, ended she was their Chief Financial Officer.

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02/18/2026 09:36:54 AM  
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8. That the Plaintiff's employers retaliated against her for failing to follow the directions stated above by placing the Plaintiff in a hostile work environment forcing her to leave the employment of the Defendants and amounting to a constructive termination and/or discharge of the Plaintiff's employment with the Defendants by attempting to coerce her to commit fraud, which she refused to do. That all of the actions set forth above on the part of the employer caused the Plaintiff to leave her employment with the Defendants, MCCC and MPS, amounting to a constructive discharge.

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 the 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 MSP,

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000005 of 000011

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 statutes.

10. That the Defendants took hostile actions toward the Plaintiff for the purpose of attempting to force the Plaintiff to quit and leave her employment with the Defendants, copy of her letter is attached. They were ultimately successful, and the Plaintiff left her employment with the Defendants on December 5th, 2025, due to the pressures and hostile work environment, and as such, she was constructively discharged, and her employment was terminated constructively by the Defendants, and a copy of the letter referred to is Exhibit One.

11. That the Plaintiff left her employment with the Defendants communicated by the attached letter informing of her resignation, necessitated, by to the constructive discharge tactics from Mountain Comprehensive Care Center Administrative Staff as stated above.

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000006 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
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12. 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.

13. That the Defendants' actions set forth herein, including violations of the statutes KRS 216B.165 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 law, as evidenced by 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.

14. That the Defendants, by way of retaliation prior to her resignation, subjected her to a mentally, and physically hostile work environment, causing her to develop medical problems, caused by the stress that she

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000007 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
KYBROADCASTING

was under, created by her employer, unlawfully and maliciously.

15. That the Defendants' efforts to remove the Plaintiff from her employment with MCCC and MPS, were fraudulent, and for purposes of furthering an objective, which was fraudulent 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 entitling the Plaintiff to damages including punitive damages pursuant to KRS 446.070,

16. 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 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.

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000008 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
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17. 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 and hospital 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,

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02/18/2026 09:36:54 AM  
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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;

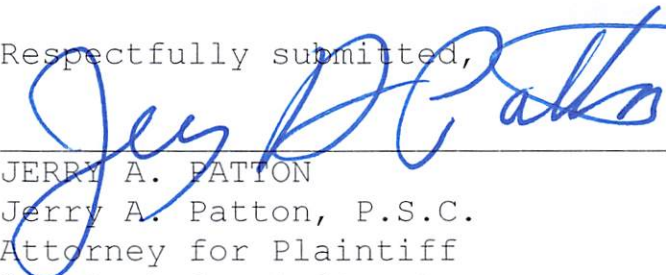
2. That all of the Plaintiff's damages for each and every cause of action set forth herein exceed the minimum jurisdictional amount of the Floyd Circuit Court;

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, P.S.C.  
Attorney for Plaintiff  
252 East Court Street  
Prestonsburg, Kentucky 41653  
Telephone No.: (606) 886-1779  
Facsimile No.: (606) 886-3005  
[jerry@jerrypattonlaw.com](mailto:jerry@jerrypattonlaw.com)

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000010 of 000011

NOT ORIGINAL

DOCUMENT

02/18/2026 09:36:54 AM  
EKYBROADCASTING

VERIFICATION

I, Rebeckah Hall, 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.

Rebeckah Hall  
REBECKAH HALL

COMMONWEALTH OF KENTUCKY  
COUNTY OF Floyd

Subscribed and sworn to before me by Rebeckah Hall to be her free act and deed, on this the 21st day of January, 2026.

Douglas R. Hall  
NOTARY PUBLIC  
June 26, 2029  
MY COMMISSION EXPIRES

Presiding Judge: HON. JOHNNY RAY HARRIS (631314)

COM : 000011 of 000011