

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

DEC - 7 - 2023

RICK WARREN
COURT CLERK

41

- (1) JANE DOE, as next friend and
guardian of JOHN DOE;

Plaintiff,

v.

- (1) LIBERTY OF OKLAHOMA
CORPORATION;
- (2) LIBERTY HEALTHCARE
CORPORATION;
- (3) ANTHONY HUHMAN;
- (4) MARC TATRO; and
- (5) HUGH SAGE;

Defendants.

Case No. CL - 2023 - 6934

JURY TRIAL DEMANDED

ATTORNEYS' LIEN CLAIMED

PLAINTIFF'S ORIGINAL PETITION

Jane Doe, as next friend and guardian of John Doe (“Plaintiff”), hereby files this Original Petition against Defendants Liberty of Oklahoma Corporation (“LOC”), Liberty Healthcare Corporation (“LHC”) (LOC and LHC are collectively referred to as “Liberty” or the “Liberty Defendants”), Anthony Huhman, Marc Tatro, and Hugh Sage (Defendants Huhman, Tatro, and Sage are collectively referred to as the “Greer Center Administrators” or “Individual Defendants”) (all Defendants are collectively referred to as the “Defendants”).

I. INTRODUCTION

1. The Robert M. Greer Center (“Greer Center”) is a full-time treatment facility in Enid, Oklahoma, for adults diagnosed with intellectual disabilities and co-occurring mental illness and/or severe behavioral challenges. The facility houses some of our most vulnerable citizens. Many of the Greer Center residents are either non-verbal, severely developmentally delayed, or both. It is supposed to be a place of healing, comfort, peace, and stability. Instead, for the last several years, it has served as hell-on-earth for many of its residents, including John Doe.

2. For years, Greer Center caretakers have routinely abused residents, including John Doe—both physically and mentally—inside the Greer Center facility. The abuse is horrific. And it was carefully coordinated and covered up through intimidation and manipulation.

3. The abuse included forms of waterboarding, choking residents until they were unconscious and then beating them until they regained consciousness, and enticing residents—persons with intellectual disabilities—to abuse each other.

4. Despite multiple attempts by residents and employees to report the abuse, it continued. Daily.

5. The depths of the Greer Center Staff's depravity and the failures of those responsible for overseeing them, including Liberty and the Greer Center Administrators, are not yet fully known. But what is known, and is described below, is tragic and can never be allowed to happen again.

II. PARTIES

6. Plaintiff Jane Doe is an individual and the legal guardian of her son, John Doe. John Doe is a resident admitted for care at the Greer Center Facility in Enid, Oklahoma. Jane Doe resides in Oklahoma City, Oklahoma.

7. Defendant Liberty of Oklahoma Corporation is a privately-owned healthcare management and staffing company contracted to operate and oversee the direct care of residents admitted at the Greer Center Facility in Enid, Oklahoma. LOC is a domestic, for-profit corporation. LOC's registered agent, C T Corporation System, can be served with process at: 1833 South Morgan Road, Oklahoma City, OK 73128. Defendant Liberty of Oklahoma Corporation is an affiliate of Defendant Liberty Healthcare Corporation.

8. Defendant Liberty Healthcare Corporation is a privately-owned health and human services management company that operates treatment programs, and provides health workforce outsourcing throughout the United States, including Oklahoma. LHC is a foreign, for-profit corporation from Pennsylvania. LHC's registered agent, C T Corporation System, can be served with process at: 1833 South Morgan Road, Oklahoma City, OK 73128.

9. Defendant Anthony Huhman is an individual and an administrator at LOC. Defendant Huhman can be served with process at 1610 E. Cypress Ave., Enid, Oklahoma 73701.

10. Defendant Marc Tatro is an individual and an administrator at LOC. Defendant Tatro can be served with process at 2828 W. Randolph Ave., Enid, Oklahoma, 73703.

11. Defendant Hugh Sage is an individual, the CEO of LOC, and an Executive Director of LHC. Defendant Sage is also the official "Administrator" in charge of the Greer Center Facility for purposes of the Oklahoma Nursing Home Care Act. *See* 63 O.S. § 1-1902(3). Defendant Sage can be served with process at 3017 Claremont, Enid, Oklahoma 73703.

III. JURISDICTION AND VENUE

12. This Court may properly exercise jurisdiction over the subject matter of this suit under Article VII, Section 7, of the Oklahoma Constitution.

13. This Court has personal jurisdiction over the Defendants, as they are all domiciled in the state of Oklahoma, created pursuant to the laws of Oklahoma, and/or conduct business in and throughout Oklahoma and have deliberately engaged in significant acts and omissions within Oklahoma that have injured citizens of Oklahoma. Defendants also have sufficient minimum contacts with the State of Oklahoma. Defendants have purposefully availed themselves of the privilege of conducting business in Oklahoma such that they are subject to suit here. Additionally, Defendants have targeted their wrongful conduct at Oklahoma. Plaintiff's claims arise out of and relate to Defendants' contacts with

the State. This Court's exercise of jurisdiction is reasonable; the maintenance of this suit does not offend traditional notions of fair play and substantial justice.

14. Venue is proper in this Court under 12 O.S. §§ 134, 137, and 139; and 18 O.S. § 471.

IV. PROCEDURAL HISTORY

15. The Oklahoma Governmental Tort Claims Act (OGTCA) does not apply to any claims asserted herein. However, out of an abundance of caution, Plaintiff will send notice of these claims to LOC and LHC pursuant to the pre-suit notice provisions of the OGTCA. 51 O.S. §§ 156, 157.

V. FACTUAL ALLEGATIONS

16. The Robert M. Greer Center is a full-time, residential treatment facility in Enid, Oklahoma, for adults diagnosed with intellectual disabilities and co-occurring mental illness and/or severe behavioral challenges.

17. John Doe has been a resident at Greer Center since May 2020. When John Doe was a child, he was diagnosed with an intellectual disability, and he has since been diagnosed with epilepsy, antisocial personality disorder, and persistent depressive disorder. Throughout his time at Greer Center, John Doe lived in the west wing of the facility, also known as Greer Center West.

18. For all intents and purposes, Greer Center was John Doe's long-term permanent residence. In fact, when John Doe was admitted to the Greer Center, the Coordinator, Anthony Huhman, told John Doe's mother Jane Doe that John Doe would likely be at Greer Center forever.

19. Greer Center is managed, operated, and staffed by the Liberty Defendants. Caretakers at the Greer Center are employees of the Liberty Defendants. The Liberty Defendants have responsibility for providing the medical, rehabilitative, and health-related care and services offered to Greer Center residents (the “Relevant Services”).

20. A recent investigation uncovered that, for well over a year, Greer Center employees—those responsible for taking care of the vulnerable residents in this facility—have instead routinely abused Greer Center residents, both physically and mentally.

21. For example, on multiple occasions, Greer Center employees would take either bed sheets or wet towels, wrap them around a resident’s neck, and then use the sheet or towel to strangle the resident until he passed out. After the resident lost consciousness, the staff members would then strike the victim in the chest and abdomen repeatedly until he woke up. One witness said the staff would play this choke-and-revive game multiple times during their shift. John Doe was a target of this abuse on several occasions. Another resident is believed to have been the victim of this sick game at least 40 times.

22. During one choke-and-revive session, the staff became worried they may have actually killed a resident because the victim was not waking up after being strangled. The staff then grabbed the resident by the back of his head/neck and threw him headfirst into a nearby door, after which he regained consciousness. This resident suffers from an intellectual disability that gives him the mental functioning of a 4-year-old.

23. Greer Center employees would also torture residents by waterboarding and beating them in the facility’s showers. John Doe was a target of this abuse as well.

24. Other times, Greer Center employees would use food from outside the facility to bribe residents—persons with intellectual disabilities—into fighting each other.

25. This abuse has gone on for years. And Greer Center employees and/or administrators have actively helped conceal the horrors and have conspired to thwart any inquiry or investigations.

26. For example, when they were abusing the residents, Greer Center employees would have at least one staff member serve as a lookout; his job was to remain outside the room, watch down the hall for anyone coming, and alert the staff members who were abusing the residents.

27. Greer Center staff would also intimidate residents to prevent them from reporting abuse, including by lurking close by and threatening residents when they were talking to loved ones on the phone.

28. Greer Center staff would also attempt to confuse the residents by using the names of other staff members from different shifts when abusing and intimidating them, making it more difficult to trace the employees' misconduct.

29. Moreover, much of the abuse occurred after 5:00 pm when the second-shift staff was present. One witness stated this was because “all the important people are gone by then.”

30. The Greer Center employees also conspired about what they would do if there was an investigation into their abuse. The Greer Center employees agreed they would lie or provide false information to investigators and would try to hinder the investigation.

31. But even when reports were made, they were ignored. One resident reported that he told Marc Tatro, the Unit Program Manager, about the abuse. But Tatro ignored it.

32. One resident also stated that he would sometimes tell his mother about what was happening, but also stated that the abusive staff would stand nearby while he was on the phone and would intimidate and threaten him to not tell anyone about what was happening to him. John Doe experienced these same intimidation tactics by the Greer Center employees when he would try to contact his mother.

33. A former Greer Center employee stated that they also repeatedly tried to report the abuse to Marc Tatro, but he refused to listen.

34. Defendants also misled Plaintiff about the facts and circumstances surrounding injuries to John Doe.

35. According to a former Greer Center employee, there is a culture at the Greer Center of not cooperating with investigations. In fact, several of the alleged incidents of caretaker abuse at the Greer Center had also allegedly been investigated by DHS's Office of Client Advocacy (OCA). However, several of the investigations could not be substantiated due to the staff at the Greer Center not cooperating (lying) and the victims being either non-verbal, severely developmentally delayed, or both.

36. Greer Center employees retaliated against other caretakers for reporting the abuse within the Greer Center.¹ In June of 2023, one former Greer Center employee made a report to law enforcement of the abuse she was witnessing at the Greer Center. Days later

¹ <https://www.readfrontier.org/stories/after-reporting-alleged-abuse-a-former-greer-center-staffer-found-flyers-saying-she-was-available-for-sex-acts/>.

a group of Greer Center employees posted flyers around town with a picture of her face advertising her as a sex worker. At least one co-worker admitted to her involvement in creating the flyers. This former employee was granted protective orders against the Greer Center employees who retaliated against her.

37. According to witnesses, the caretaker abuse inside the Greer Center was ongoing, coordinated, and systemic. One witness, who said they had spent time in prison, said they had never seen this type of abuse, even while they were incarcerated.

38. Many of those who conspired and coordinated the abuse were recently charged and/or have been arrested. One of the abusers is named Jonathan Martinez. Martinez is a Certified Nursing Assistant through the State of Oklahoma and worked as a Habilitation Specialist II at the Greer Center. On information and belief, Martinez was an employee of the Liberty Defendants.

39. Other alleged abusers included Jonathan Colon Orozco, Jhon Alan Nieto, Carlos Ponce, Edward Webster, Gavin Foster, and Adlai Flores. Edward Webster is a shift supervisor. On information and belief, each of these individuals are/were employees of the Liberty Defendants.

40. Plaintiff suffered physical, mental, and emotional abuse on a regular basis while a resident inside the Greer Center. Greer Center employees caused that abuse. And the Greer Center Administrators ignored it and helped cover it up.

VI. CAUSES OF ACTION

A. NEGLIGENCE (all Defendants)

41. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

42. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, owed a duty to John Doe and all other residents in the Greer Center to use reasonable care to provide residents with appropriate care and treatment and to protect them from mental and physical abuse and neglect.

43. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, breached that duty by failing to provide John Doe with appropriate care and treatment and by exposing him to mental and physical abuse, thereby causing harm to John Doe.

44. Defendants and their agents' and employees' breaches of the duty of care include, among other things:

- a. Failing to properly supervise the Greer Center and Greer Center staff;
- b. Failing to properly investigate reports of misconduct and abuse;
- c. Failing to conduct appropriate assessments of Greer Center residents and employees;
- d. Failing to report neglect, abuse, and misconduct as required by law;
- e. Failing to have proper policies and procedures in place to prevent neglect and abuse inside the Greer Center;
- f. Failing to have proper controls and checks in place to prevent employees from abusing residents;
- g. Failing to provide access to medical and mental health personnel capable of evaluating and treating John Doe's serious health needs;

- h. Failing to take precautions to prevent John Doe from further injury;
- i. Failing to adequately staff the Greer Center with sufficient and qualified personnel to provide the level of care and treatment needed by John Doe;
- j. Failing to hire sufficient and qualified personnel to supervise and monitor the staff at the Greer Center;
- k. Failing to properly train the Greer Center employees on abuse prevention and reporting;
- l. Failing to do a proper and thorough background check before hiring employees;
- m. Retaining problematic employees;
- n. violating the Oklahoma Nursing Home Care Act as described herein, constituting negligence *per se*;
- o. violating the Oklahoma Protective Services for Vulnerable Adults Act as described herein, constituting negligence *per se*; and
- p. violating other Oklahoma laws and statutes applicable to the Greer Center Facility, constituting negligence *per se*.

45. The Liberty Defendants have responsibility for providing the Relevant Services to Greer Center residents.

46. The Liberty Defendants are vicariously liable for the negligence and gross negligence of their employees and agents.

47. The Liberty Defendants and Individual Defendants are also directly liable for their own negligence.

48. As a direct and proximate cause of Defendants' negligence, and the negligence of their agents and employees, Plaintiff incurred the damages alleged herein, including damages for mental and physical pain and suffering, mental and physical anguish, emotional distress, and other damages and pecuniary losses.

B. GROSS NEGLIGENCE (all Defendants)

49. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

50. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, owed a duty to John Doe and all other residents in the Greer Center to use reasonable care to provide residents with appropriate care and treatment and to protect them from mental and physical abuse and neglect.

51. As described above, the Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, breached that duty by failing to provide John Doe with appropriate care and treatment and by exposing him to mental and physical abuse, thereby causing harm to John Doe

52. As a direct and proximate cause of Defendants' negligence, and the negligence of their agents and employees (for which the Liberty Defendants are vicariously liable), Plaintiff incurred the damages alleged herein, including damages for mental and physical pain and suffering, mental and physical anguish, emotional distress, and other damages and pecuniary losses.

53. Defendants' conduct involved reckless or callous indifference to John Doe's rights, in that Defendants acted in the face of and contrary to a perceived risk that their actions and/or the actions of their agents and employees violated residents' rights. Defendants were aware, or simply did not care, that there was a substantial risk that the policies and customs it promulgated, the practices it condoned, and the negligence and

indifference of its agents and employees would—and were—causing serious harm to residents like John Doe. Therefore, Plaintiff is also entitled to punitive damages.

C. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Liberty Defendants)

54. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

55. The Liberty Defendants have responsibility for providing the Relevant Services to Greer Center residents.

56. Liberty Defendants are, therefore, responsible for the intentional actions and omissions of their employees and agents. *See* 63 O.S. 2001, §1-1939(A).

57. As set forth above, the agents, employees, and servants of the Liberty Defendants physically and mentally abused John Doe and other residents at the Greer Center.

58. The actions of the Liberty Defendants' agents, employees, and servants in abusing John Doe and the other Greer Center residents were intentional and/or in reckless disregard for the emotional distress such actions were substantially certain to cause.

59. The abuse John Doe endured at the Greer Center was so extreme and outrageous as to go beyond all possible bounds of decency, would be considered atrocious and utterly intolerable in a civilized society, and caused severe pain, suffering and emotional distress to John Doe beyond that which a reasonable person could be expected to endure.

60. As a result of the intentional infliction of pain, suffering and emotional distress, Plaintiff is entitled to actual and compensatory damages from Defendants.

61. The actions of the Liberty Defendants' agents, employees, and servants in abusing John Doe and the other Greer Center residents were also malicious and/or in reckless disregard for the rights of others, and involved conduct that was life-threatening to John Doe and the other residents. Therefore, Plaintiff is also entitled to punitive damages.

D. ASSAULT & BATTERY (Liberty Defendants)

62. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

63. The Liberty Defendants have responsibility for providing the Relevant Services to Greer Center residents.

64. Liberty Defendants are, therefore, responsible for the intentional actions and omissions of their employees and agents. *See* 63 O.S. 2001, §1-1939(A).

65. As set forth above, the agents, employees, and servants of the Liberty Defendants—in physically abusing John Doe—acted intentionally with the intent of making harmful contact with John Doe and did, in fact, harmfully contact John Doe.

66. John Doe did not consent to such contact/abuse.

67. As a direct result of the assault and battery, John Doe has suffered injuries and damages.

68. The actions of the Liberty Defendants' agents, employees, and servants in abusing John Doe and the other Greer Center residents were also malicious and/or in

reckless disregard for the rights of others, and involved conduct that was life-threatening to John Doe and the other residents. Therefore, Plaintiff is also entitled to punitive damages.

E. VIOLATION OF THE NURSING HOME CARE ACT
(63 O.S. §§ 1-1901 et seq.) (all Defendants)

69. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

70. The Liberty Defendants have responsibility for providing the Relevant Services to Greer Center residents.

71. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, violated the Oklahoma Nursing Home Care Act (63 O.S. §§1-1901, et seq.), including but not limited to 63 O.S. §1-1918(B)(7),(10) (11) and (12), and 63 O.S. 2001, §1-1939, by failing to provide adequate and proper care and accommodations to John Doe and by subjecting him to mental and physical abuse and neglect.

72. Liberty Defendants are responsible for the intentional actions and omissions of their employees and agents, including all Individual Defendants (63 O.S. 2001, §1-1939(A)).

73. As a result of the violations of the Nursing Home Care Act by all Defendants, John Doe suffered serious injuries and physical and emotional pain and distress, for which Plaintiff is entitled to actual and punitive damages and costs of suit.

**F. VIOLATION OF THE PROTECTIVE SERVICES FOR
VULNERABLE ADULTS ACT (43A O.S. §§ 10-101 et seq.) (all Defendants)**

74. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

75. The Liberty Defendants have responsibility for providing the Relevant Services to Greer Center residents.

76. John Doe is a vulnerable adult as defined by the Protective Services for Vulnerable Adults Act in 43A O.S. § 10-103.

77. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, were John Doe's caretaker as defined in 43A O.S. § 10-103.

78. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, had a duty to report abuse, neglect, or exploitation of vulnerable adults at the Greer Center. 43A O.S. § 10-104.

79. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, violated the Oklahoma Protective Services for Vulnerable Adults Act (43A O.S. §§10-101, et seq.) by failing to report abuse, neglect, and exploitation of residents of the Greer Center, including but not limited to John Doe.

80. Further, the Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, willfully and recklessly concealed, manipulated, and/or hid the truth about John Doe's health to his mother and guardian, Jane Doe.

81. As a result of the violations of the Oklahoma Protective Services for Vulnerable Adults Act by all Defendants, John Doe suffered serious injuries and physical

and emotional pain and distress, for all of which Plaintiff is entitled to actual and punitive damages.

G. NEGLIGENCE PER SE (all Defendants)

82. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

83. As described herein, Defendants violated the Oklahoma Nursing Home Care Act, including the provisions of 63 O.S. §11918 and §1-1939, which provide the following rights:

- Every nursing home resident has the right to receive courteous and respectful care and treatment;
- Every nursing home resident has the right to be free from mental and physical abuse;
- Every nursing home resident has the right to receive adequate and appropriate medical care consistent with established and recognized medical practice standards within the community;
- Every nursing home resident has the right to reside and to receive services with reasonable accommodation of the individual needs and preferences, except where the health or safety of the individual or other residents would be endangered;
- A facility employee or agent who becomes aware of abuse, neglect or exploitation of a resident prohibited by the Nursing Home Care Act shall immediately report the matter to the facility administrator. A facility administrator who becomes aware of abuse, neglect, or exploitation of a resident shall immediately act to rectify the problem and shall make a report of the incident and its correction to the Department;
- The facility shall be responsible for reporting the following serious incidents to the Oklahoma Dept. of Health within twenty-four (24) hours:
 - situations arising where a rape or a criminal act is suspected. Such situations shall also be reported to local law enforcement immediately.

The facility shall make every effort to preserve the scene of the suspected rape or crime until local law enforcement has arrived, and

- resident abuse, neglect and misappropriation of the property of a resident.

- All other incident reports shall be made in accordance with federal law;
- All initial written reports of incidents or situations shall be mailed to the Department within five (5) working days after the incident or situation. The final report shall be filed with the Department when the full investigation is complete.

84. Defendants also violated the Oklahoma Protective Services for Vulnerable Adults Act (43A O.S. §§10-101, et seq.) by failing to report abuse, neglect, and exploitation of residents of the Greer Center, including but not limited to John Doe.

85. Defendants' violation of the Oklahoma Nursing Home Care Act and/or the Oklahoma Protective Services for Vulnerable Adults Act constitutes negligence *per se*.

86. Liberty Defendants are also responsible for the intentional actions and omissions of their employees and agents, including all Individual Defendants. *See* 63 O.S. 2001, §1-1939(A).

87. As a result of the violations of the Nursing Home Care Act and/or the Oklahoma Protective Services for Vulnerable Adults Act by all Defendants, John Doe suffered serious injuries and physical and emotional pain and distress, for which Plaintiff is entitled to actual and punitive damages and costs of suit.

H. CIVIL CONSPIRACY (all Defendants)

88. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

89. The Liberty Defendants, and their agents, employees, or servants, including all Individual Defendants, conspired to overtly conceal the abuse and neglect being inflicted upon the residents of the Greer Center, including John Doe.

90. Defendants conspired to overtly lie or conceal the truth from investigators, including the DHS's Office of Client Advocacy (OCA), as to the ongoing abuse and neglect inside the Greer Center.

91. Defendants conspired to overtly retaliate against other employees for speaking out about the abuse and neglect inside the Greer Center.

92. And Defendants overtly misrepresented facts concerning John Doe's health and well-being to his mother and guardian.

93. Moreover, Defendants conspired to overtly violate Oklahoma law, including but not limited to the Oklahoma Nursing Home Care Act and/or the Oklahoma Protective Services for Vulnerable Adults Act, as described herein.

94. As a result of the Defendants conspiracy, John Doe suffered serious injuries and physical and emotional pain and distress, for which Plaintiff is entitled to actual and punitive damages and costs of suit.

VII. JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

VIII. PRAYER FOR RELIEF

WHEREFORE, premises considered, Plaintiff respectfully prays for judgment in his favor and against Defendants, jointly and severally, as follows:

- a) Damages as set out in COUNTS V.A-H, above;

- b) Attorney's Fees and Cost of Litigation; and
- c) Any other relief to which Plaintiff is entitled.

Respectfully Submitted,

/s/Brad E. Beckworth

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JURY TRIAL DEMANDED