GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

September 23, 2026

Laura Whaley
Assured Care Assisted Living, LLC
Suite 203
3196 Kraft Ave SE
Grand Rapids, MI 49512

RE: License #: AL110283722
Investigation #: 2026A0790041
The Willows Assisted Living #2

Dear Ms. Whaley:

Attached is the Special Investigation Report for the above-referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available and you need to speak to someone immediately, please contact the local office at (616) 356-0100.

Sincerely,



Rodney Gill, Licensing Consultant
Bureau of Community and Health Systems
Unit 13, 7th Floor
350 Ottawa, N.W.
Grand Rapids, MI 49503
gillr@michigan.gov
(517) 980-1433

enclosure

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF COMMUNITY AND HEALTH SYSTEMS
SPECIAL INVESTIGATION REPORT

I. IDENTIFYING INFORMATION

License #:	AL110283722
Investigation #:	2026A0790041
Complaint Receipt Date:	09/09/2026
Investigation Initiation Date:	09/10/2026
Report Due Date:	11/08/2026
Licensee Name:	Assured Care Assisted Living, LLC
Licensee Address:	Suite 203 3196 Kraft Ave SE Grand Rapids, MI 49512
Licensee Telephone #:	(616) 285-0573
Administrator:	Laura Whaley
Licensee Designee:	Laura Whaley
Name of Facility:	The Willows Assisted Living #2
Facility Address:	3507 Hollywood Road St. Joseph, MI 49085
Facility Telephone #:	(269) 428-0715
Original Issuance Date:	11/14/2007
License Status:	REGULAR
Effective Date:	09/18/2026
Expiration Date:	09/17/2028
Capacity:	20
Program Type:	ALZHEIMERS AGED

II. ALLEGATION(S)

	Violation Established?
Resident A has been financially exploited.	Yes
Resident A's medical care needs have not been met.	Yes

III. METHODOLOGY

09/09/2026	Special Investigation Intake 2026A0790041
09/09/2026	APS Referral is not necessary because this is a denied Adult Protective Services (APS) complaint.
09/10/2026	Special Investigation Initiated - On Site
09/10/2026	Inspection Completed On-site I interviewed direct care staff members (DCSMs) Marie Purnell, Kiarra Hill who functions as building manager, business development manager Janet White, and Resident A.
09/10/2026	Contact - Telephone call made I called Relative A1. I left a voicemail message requesting a return call.
09/10/2026	Contact - Telephone call made I called Adult Protective Services (APS) Worker John Wheeler. I left a voicemail message requesting a return call and information regarding Resident A.
09/11/2026	Contact - Telephone call received from APS worker John Wheeler. Mr. Wheeler provided the information I requested regarding Resident A.
09/15/2026	Contact - Face to Face I interviewed business development manager Janet White, direct care staff member (DCSM) Alyssa Saas who functions as the director of resident care.
09/16/2026	Contact - Telephone call made

	I called Relative A1. I left a voicemail message requesting a return call.
09/16/2026	Contact - Telephone call received I received two return calls from Relative A1. Relative A1 left a voicemail message stating that I could call him back if I wanted to speak with him.
09/16/2026	Contact - Telephone call made I called care manager Araceli Alvarez from Area Agency on Aging. I left a voicemail message requesting a return call.
09/21/2026	Contact - Telephone call made I called care manager Araceli Alvarez from Area Agency on Aging. I left a voicemail message requesting a return call.
09/22/2026	Contact - Telephone call received I interviewed care manager Araceli Alvarez.
09/23/2026	Inspection Completed-BCAL Sub. Compliance
09/23/2026	Exit Conference with licensee designee Laura Whaley.
09/23/2026	Corrective Action Plan Requested and Due on 10/8/26.

ALLEGATION:

Resident A has been financially exploited.

INVESTIGATION:

On 9/10/26, I reviewed a denied Adult Protective Services (APS) referral dated 9/8/26. The APS referral indicated that Resident A resides at The Willows Assisted Living #4. Resident A is diagnosed with anxiety, depression, peripheral vascular disease, renal failure and diabetes.

The referral indicated Resident A receives social security. Resident A does not manage his finances. It is unknown who manages Resident A's finances. The referral indicated that Resident A does not have a guardian, family member, or friend

to manage his finances. It is believed that administration at The Willows Assisted Living have been paying themselves as an Adult Foster Care (AFC) large group home providing room, board, and personal care services to Resident A.

I conducted an unannounced onsite investigation on 9/10/26. I interviewed direct care staff member (DCSM) Marie Purnell. Ms. Purnell indicated that she has worked for The Willows Assisted Living for eight years. Ms. Purnell said she has no knowledge of and is not responsible for any of the residents' finances or billing.

I interviewed DCSM Kiarra Hill who functions as building manager for The Willows Assisted Living #2. She said she has worked for The Willows Assisted Living for three years. Ms. Hill said she has no knowledge of Resident A's finances or what or how he is billed for room, board, and direct care services.

I interviewed Resident A. Resident A said he is supposed to receive a certain amount of his Social Security Income (SSI) each month and does not know the last time he has received any money. Resident A said he would like to have access to the SSI funds he is supposed to get each month and to be provided with access to his checking account as needed. He stated that he does not have access to his SSI check or his bank account and no one at the AFC large group home will assist him. Resident A said he is unaware who has been accessing his checking account.

I interviewed business development manager Janet White. Ms. White recently accepted the position of business development manager after long time administrator Nora Ramirez resigned her position with the company.

Ms. White explained that she has been working to get all of the residents' *Resident Records* in order. She said she has been getting to know the residents and their families and friends. Ms. White indicated that she has been working tirelessly to get all the residents' documents, personal care needs, ledgers, and financials with the AFC large group home up to date and in order.

Ms. White stated that she had yet to figure out Resident A's financial situation. Ms. White assisted me with looking into Resident A's financial situation pertaining to his room, board, direct care services, and resident funds. Ms. White provided me with obtaining supporting documentation.

On 9/11/26, Adult Protective Services (APS) worker John Wheeler called and provided me with information I requested. Mr. Wheeler indicated that APS does not have an open case with Resident A currently. He stated the last time they had an open case with Resident A was back in 2024. Mr. Wheeler explained that he did not investigate anything related to financial exploitation in 2024. He indicated that in 2022 they investigated allegations of financial exploitation and found that Relative A1 had stolen money from Resident A so they removed Relative A1 as power of attorney (POA) and off of Resident A's bank account. Mr. Wheeler stated that it is

his understanding that Resident A has been handling his own finances since 2022. He said he has no documentation or information indicating otherwise.

On 9/15/26**,** I interviewed business development manager Janet White and direct care staff member (DCSM) Alyssa Saas who functions as the director of resident care face to face at The Willows Assisted Living.

Ms. White and Ms. Saas were unaware as to who has been handling Resident A's Finances. Ms. White and Ms. Saas were unaware who manages Resident A's finances, who currently has access to his bank account, or who has been paying The Willows Assisted Living large group home for his room, board, and direct care services.

Ms. White and Ms. Saas were unaware as to why Resident A has not been receiving The resident funds he is supposed to receive from his SSI check each month. Ms. White called colleague, name unknown, who works as an administrator for the Company who admitted Resident A should be receiving a portion of his SSI check each month and did not know who is managing Resident A's finances, who has access to his bank account, or who has been paying The Willows Assisted Living large group home for his room, board, and direct care services. The colleague indicated that Resident A should be receiving $67.00 each month to spend as he deems fit.

Ms. Saas admitted to previous APS and law enforcement involving regarding Resident A being financially exploited by Relative A1. Ms. Saas indicated that Guardianship services were never initiated for Resident A as far as she is aware.

Ms. White and Ms. Saas provided me with all of the supporting documentation and I requested.

On 9/15/26, I reviewed Resident A's *Resident Records.* I specifically reviewed Resident A's Patient Intake Form dated 8/20/25. I found that Resident A is his own person. The form indicated that Resident A acknowledged that he received verbal and written information and explanation regarding his patient intake form, consent for services, chronic care management, and wound consent. The form also indicated that Resident A had the opportunity to discuss concerns and ask questions regarding the above-listed information.

I reviewed two of Resident A's *Resident Care Agreements.* The first *Resident Care Agreement* reviewed was signed by Resident A and the previous administrator Nora Ramirez but was not dated. I found that according to this agreement, Resident A was to pay $1,272.89 per month for room, board, and personal care services. I wound that Resident A was receiving assistance through Area Agency on Aging and was receiving financial assistance through the MI Choice Waiver Program. I also found that The Willows Assisted Living was not responsible for transportation.

I reviewed a second *Resident Care Agreement* for Resident A. The second *Resident Care Agreement* was also signed by Resident A and Ms. Ramirez and was dated 6/12/26. This second agreement indicated that Resident A agreed to pay $2.001.83 per month for room, board, and personal care services. The agreement indicated that the specific services provided were room, board, housekeeping, laundry, all meals and snacks, medication administration, ADL care, activities, and Direct TV.

I reviewed a bank statement of Resident A's dated 1/12/26. I found that Resident A receives $1,751.00 in SSI per month and that someone withdrew $2,001.83 for room, board, and personal care services provided by The Willows Assisted Living #2. During this investigation, no one interviewed could tell me who has access to Resident A's bank account nor who is withdrawing his funds. Resident A stated that he does not know who has access to and is withdrawing his funds. He has not received the portion of his SSI he is entitled to since his admission to the AFC large group home based on the evidence obtained during this special investigation.

I reviewed Resident A's most recent *Health Care Appraisal* dated 8/24/26 and his Resident Information Sheet and both indicated that Resident A's only diagnosis is vitamin D deficiency, unspecified. It should be noted that Resident A is currently living in the memory care unit which is more expensive than the other two large group facilities located on the property and attached to the memory care unit.

When asked why Resident A is in the memory care unit, Ms. Saas said that he had attempted to abscond on a few occasions and had gotten into DCSMs' vehicles so was placed in the memory care unit.

Ms. Saas indicated that she is not aware of any cognitive or memory issues negating Resident A to be placed in the memory care unit or a secured AFC facility. She indicated that the times Resident A absconded, he had consumed large amounts of concentrated sugary foods which she believed precipitated Resident A's attempts to abscond because after consuming the concentrated sugary foods he became preoccupied with leaving the AFC large group home to find his children in his home country.

I reviewed Resident A's funds form from 6/8/26 to 8/12/26. The form showed that monthly withdrawals were made from Resident A's checking account by someone. On 6/5/26, the amount withdrawn from Resident A's checking account was $2,001.83. It appeared that these funds were returned to the bank on 6/6/26 for some reason. On 6/17/26, the amount withdrawn from Resident A's checking account was $2,036.83. On 8/4/26, the amount withdrawn from Resident A's checking account was again $2,036.83. It should be noted that Resident A was carrying a balance of $5.996.96 owed to the AFC large group home. The MI Choice

Waiver Program is paying $1,929.00 per month towards Resident A's room, board, and personal care services according to the funds form I reviewed.

I reviewed an email sent from a Jennifer Klok to the previous administrator Nora Ramirez dated 6/10/26. The email indicated that the Automated Clearing House (ACH) that Jennifer Klok ran for Resident A did not go through. Ms. Klok said she would be applying a $35.99 Non-Sufficient Funds (NSF) charge to her ledger and adding it to Resident A's current deficit.

The email went on to indicate that Ms. Klok did not see that there is a phone number for Relative A1 in their Matrix Care. Ms. Klok asked Ms. Ramirez if she had a number for Relative A1. She indicated she would like to give Relative A1 a heads up as she was planning to rerun the payment that day.

Ms. Ramirez responded on 6/10/26 that it was strange about Resident A's checking account. She indicated that Relative A1 was no longer allowed to touch Resident A's money because he had stolen from Resident A in the past. Ms. Ramirez indicated that she had sent Resident A to the guardianship and that they may have started paperwork on him and taken over his checking account. Ms. Ramirez said she had not heard from them, but she would check and see if they know anything.

I reviewed an email exchange between Ms. Ramirez and Deputy Christian Campbell from the Berrien County Sheriff's Office dated Friday 7/22/22. The email exchange pertained to Relative A1 stealing money from Resident A's checking account.

Ms. Ramirez admitted in the email exchange between her and Deputy Campbell that Resident A was required to receive $60.00 a month of his SSI at the time.

Ms. Ramirez indicated that APS assisted with Resident A's admission to the AFC large group home and had paid $1,000.00 towards his care.

Ms. Ramirez indicated that Relative A1 initially was at the AFC large group home visiting Resident A often but after approximately a month he stopped visiting Resident A entirely.

Ms. Ramirez indicated that she had made an automatic withdrawal from Resident A's checking account on 6/21/22 in the amount of $1,191.00 for his bill owed. She said she attempted an automatic withdrawal several times only to get NSF results. Ms. Ramirez indicated that she found out as of 7/21/22, Resident A only had $14.69 left in his checking account and that Relative A1 had taken the rest of his money

from the account. She indicated that Resident A was receiving $1,300.00 a month in SSI at the time.

Ms. Ramirez indicated that Resident A owed the AFC large group home $5,711.11 at the time for room, board, and personal care services.

On 9/22/6, I interviewed care manager Araceli Alvarez from Area Agency on Aging. Ms. Alvarez indicated that she is unaware of who is managing Resident A's finances. She indicated that Resident A is his own person and does not have a guardian, family member, or friend to help him manage his funds. Ms. Alvarez stated that she believes someone from the AFC large group home must be automatically withdrawing funds from Resident A's checking account to pay for his room, board, and personal care services. Ms. Alvarez said she is concerned about this arrangement and believes Resident A should have a guardian and/or payee.

Ms. Alvarez confirmed that Resident A is required to receive a small portion of his SSI each month for personal needs. She indicated that Resident A has not been receiving these funds.

APPLICABLE RULE	
R 400.637	**Handling of resident funds and valuables.**
	(8) A resident shall have access to and use of their resident funds in reasonable amounts, including immediate access to not less than $40.00. A resident shall receive up to the full amount of resident funds at a time designated by the resident, but not more than 5 days after the request for the resident funds. Exceptions must be subject to the provisions of the resident's assessment plan.
ANALYSIS:	Based on the information gathered during this special investigation through personal observation, review of documentation, and interviews with Ms. Purnell, Ms. Hill, Ms. White, Resident A, Mr. Wheeler, Ms. Saas, and Ms. Alvarez there was sufficient evidence found indicating that Resident A has not received a portion of his SSI as required by the MI Choice Waiver Program. Resident A should be receiving $67.00 per month of his SSI and based on the evidence found during this special investigation it appeared that he has not received the required portion of his SSI since admitted to The Willows Assisted Living.
CONCLUSION:	**VIOLATION ESTABLISHED**

APPLICABLE RULE	
R 400.681	**Resident rights; licensee responsibilities.**
	(1) A resident shall be treated with dignity and respect, free from exploitation, and protected and safe.
ANALYSIS:	Based on the information gathered during this special investigation through personal observation, review of documentation, and interviews with Ms. Purnell, Ms. Hill, Ms. White, Resident A, Mr. Wheeler, Ms. Saas, and Ms. Alvarez there was sufficient evidence found indicating that Resident A is being financially exploited. It is unknown who is responsible for withdrawing funds from Resident A's bank account to pay for his room, board, and personal care. It was also found that Resident A's SSI is $1,751.00 per month and yet he is charged $2,001.83 per month for room, board, and personal care by the AFC large group home.
CONCLUSION:	**VIOLATION ESTABLISHED**

ALLEGATION:

Resident A's medical care needs have not been met.

INVESTIGATION:

The referral indicated that Resident A is diabetic with one leg. On 7/29/26, Resident A had cuts that developed on his foot and his toenails were observed to be long and unkempt. The cuts on Resident A's feet were addressed by medical professionals and were bandaged.

The referral indicated that Resident A is capable of cutting his own toenails but does not have access to a toenail clipper at The Willows Assisted Living. Resident A cannot leave the facility to get a toenail clipper due to memory issues and not having access to his finances.

The referral indicated that direct care staff members (DCSMs) at the facility have not clipped Resident A's toenails. Resident A has been wanting to see a podiatrist to address the cuts he had on his feet, but DCSMs have not allowed him to be seen by the podiatrist that visits the facility. DCSMs have indicated that Resident A's health

coverage does not cover podiatry services and the reason why they have not placed him on the list to see the podiatrist. However, Resident A has the funds to pay to be seen by the podiatrist. The referral indicated that it is unknown if Resident A has developed more cuts on his feet, but his toenails are still long.

Ms. Purnell said Resident A is an amputee, and she has no knowledge of Resident A having issues with his foot. Ms. Purnell indicated that she has worked with Resident A for many years and has never heard him request his toenail clippers to cut his toenails, ask DCSMs to cut them, or to see the podiatrist that visits their AFC large group homes.

Ms. Purnell indicated that she has no knowledge of Resident A developing cuts on his foot.

Ms. Hill said she has never heard Resident A indicate that his toenails need to be cut. She said she is unaware of Resident A's toenails getting too long or unkempt. Ms. Hill also indicated that she is unaware of Resident A developing cuts on his foot.

Resident A stated that he has needed his toenails trimmed and has been requesting assistance with doing so for months. He said that he could cut them himself if DCSMs would give him his toenail trimmers back. Resident A said he would be okay if a DCSM cut them. He stated that he would also be okay with having the podiatrist who visits the AFC large group home trim and maintain them as needed. Resident A stated that he has been wanting and needing to see the podiatrist for many months.

I observed Resident A's foot and found no cuts or wounds of any kind. I did observe Resident A's toenails to be quite long and in need of trimming and attention.

Ms. White was unaware of the situation surrounding the condition of Resident A's foot, specifically the need to get his toenails trimmed and cared for. Ms. White was unaware if Resident A is able to cut his own toenails if he had access to his toenail clippers. She was also unaware whether Resident A has been requesting his toenail clippers, has asked DCSMs to cut his toenails, or to see the podiatrist that routinely visits the AFC large group home.

Mr. Wheeler stated that APS has never investigated allegations of medical neglect involving Resident A as far as he is aware.

Ms. Saas admitted that Resident A and Resident A's care manager from Area Agency on Aging Araceli Alvaraz had requested on numerous occasions that Resident A see the podiatrist that visits the AFC large group home. Ms. Saas said

she informed them that Resident A's health insurance would not pay for him to receive medical care from the podiatrist.

Ms. Saas said recently physician assistant (PA) Angela Sokolowski who provides medical care to Resident A and other residents living at the facility has been trained to provide podiatric care. Ms. Saas explained that she had not gotten around to scheduling an appointment for Resident A to receive podiatric care from PA Angela Sokolowski. Ms. Saas scheduled an appointment for Resident A to receive podiatric care from Ms. Sokolowski on 9/16/26 between 2:00 p.m. and 4:00 p.m.

Ms. Alvarez disclosed that she witnessed firsthand the cuts that had developed on Resident A's foot and observed his toenails and found that they were long and unkempt. She indicated she believed that the cuts were addressed by medical professionals and were bandaged. Ms. Alvarez indicated that she and Resident A have been requesting Resident A receive podiatry care for quite some time, but he has yet to receive it. She said she has been told by DCSMs that Resident A's health insurance will not cover podiatry care. Ms. Alvarez indicated that Resident A's health insurance is through Humana.

APPLICABLE RULE	
R 400.671	**Resident care.**
	(2) Care and services provided to a resident must be designed to maintain or improve a resident's physical and intellectual functioning and independence.
ANALYSIS:	Based on the information gathered during this special investigation through personal observation and interviews with Ms. Purnell, Ms. Hill, Ms. White, Resident A, Mr. Wheeler, Ms. Saas, and Ms. Alvarez there was sufficient evidence found indicating that Resident A's medical needs are not being met. Resident A and his care manager from Area Agency on Aging Araceli Alvarez had been asking that Resident A receive podiatry services for weeks, which Resident A did not receive.
CONCLUSION:	**VIOLATION ESTABLISHED**

On 9/23/26, I conducted an exit conference / interview with licensee designee Laura Whaley. Ms. Whaley was informed of the outcome of this special investigation and did not dispute the findings. Ms. Whaley was asked to provide an acceptable Corrective Action Plan (CAP) within the required timeframe and agreed to do so.

IV. RECOMMENDATION

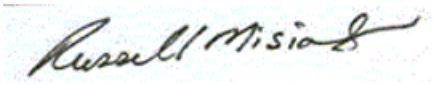
Contingent upon receipt of an acceptable plan of corrective action, I recommend the status of the license remain the same.



10/1/26

Rodney Gill — Date
Licensing Consultant

Approved By:



10/7/26

Russell B. Misiak — Date
Area Manager