



"Autism Specialists" Sued

Stephen Barrett, M.D.

The father of a 7-year-old boy has filed suit against two self-styled "autism specialists," their clinics, and a laboratory that tests urine specimens for "toxic metals." The complaint (shown below) states:

- Defendants Anjum Usman, MD; True Health Medical Center; Dan Rossignol, MD; Creation's Own, and Doctor's Data Laboratory conspired to induce patients to undergo unwarranted chelation therapy.
- The scheme in this case centered around Usman's use of a "provoked" urine toxic metals test to falsely assert that the boy had accumulated dangerous levels of mercury and several other metals. Usman made this initial assessment when he was only two years old even though he had had no significant exposure to toxic metals.
- Chelation therapy was administered with suppositories when the boy was four and included 41 intravenous sessions over an 18-month period, beginning when he was five.
- The inappropriate treatments also included dietary supplements, hyperbaric oxygen, hormones, and other drugs that were unnecessary, unapproved, and/or potentially dangerous.
- Whereas Usman examined and treated the boy at her office, Rossignol, without ever examining him, based his recommendations on telephone conversations with the mother over a 25-month period.

The provoked urine toxic metals test is a fraud. The suit asks for damages related to negligence, lack of informed consent, intentional misrepresentation, negligent misrepresentation, battery, and civil conspiracy. In 2011, the Illinois Department of Financial and Professional Regulation charged Usman with unprofessional conduct in her management of the boy. In 2014, the suit was voluntarily withdrawn, but this type of withdrawal preserves the right to file it again.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION ANGELES

JAMES COMAN, Individually and as)
 Father and Next Friend of)
 AUGUST JAMES COMAN,)
 a/k/a A.J. COMAN, a Minor,)

Plaintiff,)
)
 v.)
)
 ANJUM I. USMAN, M.D., a/k/a ANJU I. USMAN, M.D.,)
 TRUE HEALTH MEDICAL CENTER, S.C., DANIEL)
 ROSSIGNOL, M.D., CREATION’S OWN CORP., and)
 DOCTOR’S DATA, INC.,)
)
 Defendants.)
)
 _____)
)

No. 200911009

Plaintiff Demands a Jury Trial

COMPLAINT AT LAW

NOW COMES the Plaintiff, JAMES COMAN, Individually and as Father and Next Friend of AUGUST JAMES COMAN,a/k/a A.J. COMAN, a Minor, by and through his attorneys, DAVID J. WILZIG, INC. APC by David J. Wilzig pending pro hac vice, and JOSEPH, LICHTENSTEIN & LEVINSON, and complaining of the Defendants, ANJUM I. USMAN, M.D., a/k/a ANJU I. USMAN, M.D., TRUE HEALTH MEDICAL CENTER, S.C., DANIEL ROSSIGNOL, M.D., CREATION’S OWN CORP., and DOCTOR’S DATA, INC., states as follows:

Facts Common to All Counts

1. Minor Plaintiff, AUGUST J. COMAN, a/k/a A.J. COMAN (hereinafter, “A.J.”), was born July 14, 2002.
2. Plaintiff, JAMES COMAN (hereinafter, “COMAN”), is the father of A.J.
3. At all relevant and material times herein, the Defendant, ANJUM I. USMAN, M.D., a/k/a ANJU I. SMAN,M.D.(hereinafter, “USMAN”), was a medical doctor licensed to practice medicine by the State of Illinois, holding license number 036083420, with her principal place of business located at 603 E. Diehl Road, Suite 135, Naperville, Illinois 60563.
4. At all relevant and material times herein, the Defendant, TRUE HEALTH MEDICAL CENTER, S.C. (hereinafter, “TRUE HEALTH”), was a medical and hospital facility registered to do and doing business in Illinois, with its principal place of business located at 603 E. Diehl Road, Suite 135, Naperville, Illinois 60563.
5. At all relevant and material times herein, the Defendant, TRUE HEALTH, was owned and managed by the Defendant, USMAN.
6. At all relevant and material times herein, the Defendant, DANIEL ROSSIGNOL, M.D. (hereinafter, “ROSSIGNOL”), was a medical doctor licensed to practice medicine by the State of Florida, holding license number ME97209, with his principal place of business located at 3800 W. Eau Gallie Boulevard, Suite 105, Melbourne, Florida 32934.
7. At all relevant and material times herein, the Defendant, ROSSIGNOL, unlicensed in Illinois, conducted business by performing telephone consultations with and treatment of patients throughout the United States, including Illinois patients such as the Minor Plaintiff, A.J., with joint treatment of such patients with healthcare practitioners in other states, including the Defendant,

USMAN. This included sending reports of his opinions, findings, and billing statements to healthcare practitioners and their patients in other states, including Defendant USMAN and Minor Plaintiff A.J.

8. At all relevant and material times herein, the Defendant, CREATION'S OWN CORP. (hereinafter, "CREATION'S OWN"), was a business owned and operated by the Defendant, ROSSIGNOL, among others, with its principal place of business located at 3800 W. Eau Gallie Boulevard, Suite 105, Melbourne, Florida 32934.

9. At all relevant and material times herein, the Defendant, CREATION'S OWN, advertised, distributed, and sold dietary supplements to patients throughout the United States, including Illinois.

10. At all relevant and material times herein, the Defendant, DOCTOR'S DATA, INC. (hereinafter, "DOCTOR'S DATA"), an Illinois corporation, was a clinical laboratory and/or testing facility with its principal place of business located at 3755 Illinois Avenue, St. Charles, Illinois 60174.

11. The events described herein, in which the Defendants, ROSSIGNOL, CREATION'S OWN, and DOCTOR'S DATA, treated the Minor Plaintiff, A.J., vis-a-vis telephone consultations and/or participated in A.J.'s care and treatment occurred in Cook County.

12. Defendant USMAN is a self-professed expert in the treatment of claimed biochemical imbalances in children with autism and is actively involved in the Defeat Autism Now! ("DAN!") movement as a speaker and researcher, and is a member of DAN!'s physician training team and the DAN! think tank. Defendant USMAN advocates, promotes, and uses chelation therapy in the treatment of autism, an invasive and non-standard treatment not medically justified for the treatment of childhood autism. The long-term effects of chelation therapy are not benign and remove significant nutrients from the body. A child exposed to chelation therapy may not develop normally. Problems resulting from the therapy may be masked and not appear until adulthood.

13. Defendant ROSSIGNOL markets himself and his medical facilities, CREATION'S OWN and International Child Development Resource Center ("ICDRC"), as experts in the treatment of childhood autism and widely publicize purported success stories.

14. Defendant CREATION'S OWN markets itself throughout the United States, including the State of Illinois, as being a foremost authority on the evaluation and treatment of children with autism and, as an adjunct to its medical practice, advertises, distributes, and sells dietary supplements to autistic patients.

15. On or about April 14, 2004, when A.J. was less than two years old, his mother, Like Coman, sought treatment for A.J. with Defendants USMAN and TRUE HEALTH relating to concerns that her son was exhibiting symptoms of potentially autistic behavior, including language delay, hyperactivity, short attention span, lack of boundaries, and teeth grinding.

16. At A.J.'s appointment on April 19, 2004, Defendant USMAN examined A.J., created a "problem list" of concerns relating to his condition, including elevated Ph level, suspected elevated cu/zinc levels, and potential dysbiosis. Defendant USMAN recommended diet restrictions, prescribed supplements, ordered laboratory analysis for heavy metal toxicity, and outlined a future treatment plan involving vitamin B-12 injections. Defendant USMAN made no diagnosis of A.J.'s medical condition. Defendant USMAN did not diagnose autism, or anything

else.

17. On or about April 19, 2004, Defendant USMAN ordered the collection of a urine specimen from A.J. that was accomplished after the administration of a provoking agent, a compound administered that presumptively attaches to lead, cadmium, mercury, and other molecules in the blood forcing them to be excreted in a patient's urine. Thereafter, A.J.'s urine specimen was sent to DOCTOR'S DATA, which performed a "urine toxic metals" test and determined, in its April 22, 2004, report, that A.J. had several toxic metal elements in the 90% and above range. A.J. was only two years old at the time of his initial "urine toxic metals" test and had not been exposed to mercury or any other heavy metal in significant quantity.

18. From April 19, 2004, through early December 2006, Defendant USMAN consulted with A.J.'s mother and examined A.J. on several occasions. On those occasions, Defendant USMAN ordered laboratory testing for heavy metal toxicity, prescribed dietary supplements and medications, including but not limited to Methyl B-12 and Nystatin, and recommended continuing and varying diet restrictions. Defendant USMAN ordered a treatment regime for A.J. that reflected her practice of treating claimed heavy metal intoxication and biochemical imbalances that she believed caused autism. Defendant USMAN did not diagnose A.J.'s condition as autism.

19. It has not been generally accepted in the medical and scientific communities that chemical imbalances, or chemical or heavy metal toxicity is the cause (or a major contributing cause) of autism. Reliable medical and scientific studies have not determined precisely what causes autism, although some of the most widely recognized potential causes of autism include genetic factors, developmental anomalies in utero, and brain abnormalities at birth. Scientific studies are investigating possible genetic, infectious, neurological, and environmental causes and mechanisms of autism, but this research has not identified a definitive cause of autism.

20. From January 27, 2006, through March 7, 2009, Defendant USMAN, alone and in conjunction with Defendant ROSSIGNOL, ordered "urine toxic metals" testing to be performed on A.J. with urine specimens collected using a provoking agent. Defendant DOCTOR'S DATA performed the urine toxic metals tests on each occasion with results that indicated: several elements in the 90% and above range of metal contamination (4/22/2004), several elements in the 90% and above range of metal contamination (1/27/2006), lead in the 90% range of metal contamination (1/13/2007), elevated levels of lead, tin, and mercury on the cusp of metal contamination (2/26/2007), lead in the 90% range of metal contamination (5/26/2007), lead on the cusp of metal contamination (8/6/2007), high elevated levels of lead contamination and elevated levels of aluminum and nickel contamination (10/30/2007), very high elevated levels of lead contamination and elevated levels of nickel, tin, and tungsten contamination (11/13/2007), very elevated level of lead contamination and elevated levels of aluminum, nickel, and tin contamination (1/12/2008), lead in the 90% range of metal contamination (1/26/2008), lead on the very elevated cusp of metal contamination and elevated levels of aluminum, mercury, and nickel on cusp of metal contamination (4/26/2008), very elevated level of lead contamination and elevated levels of aluminum, mercury, and nickel on the cusp of metal contamination (10/29/2008), very elevated level of lead contamination and elevated levels of aluminum, tin, and nickel on the cusp of metal contamination (3/7/2009).

21. On or about December 18, 2006, A.J.'s mother initiated telephone consultations with Defendant ROSSIGNOL, who treated A.J. over a two-year period solely via telephone consultations without ever seeing A.J. in person or examining A.J., as would a physician practicing medicine within the standard of care. Defendant ROSSIGNOL made diagnoses and established treatments on the basis of laboratory tests ordered and performed by Defendant

USMAN and analyzed by Defendant DOCTOR'S DATA, sometimes together with verbal reports he received from A.J.'s mother, who was not a medically qualified observer.

22. On or about December 18, 2006, at the time of A.J.'s mother's initial telephone consultation with Defendant ROSSIGNOL, ROSSIGNOL definitively diagnosed A.J. as suffering from the toxic effects of mercury and its compounds, encephalopathy unspecified and an unspecified nutritional deficiency. Defendant ROSSIGNOL did not diagnose A.J.'s condition as autism. Defendant ROSSIGNOL prescribed Oxytocin NS (a non-approved drug), believed to be manufactured and/or distributed by Defendant CREATION'S OWN.

23. On or about December 20, 2006, Defendant USMAN examined A.J. and prescribed several so-called dietary supplements, continued A.J.'s diet restrictions, and, based on laboratory analysis that indicated A.J. had "heavy metal issues," Defendant USMAN commenced prescribing EDTA and DMPS (a non-FDA approved drug) to be used rectally for chelation.

24. A.J. continued the regimes instituted by Defendants USMAN and ROSSIGNOL from late December 2006 through mid-October 2007. During that period of time, Defendant USMAN diagnosed heavy metal toxicity, continued diet restrictions, ordered supplements for A.J., and prescribed Spironolactone (a diuretic that was medically unnecessary and is known to cause tumors), Nystatin, Curacumin, DMPS suppositories for rectal chelation, and EDTA. At no point during this period of time did Defendant USMAN diagnose A.J.'s condition as autism.

25. During the same period of time from late December 2006 through mid-October 2007, Defendant ROSSIGNOL continued his telephone consultations with A.J.'s mother and diagnosed, without ever seeing or examining A.J., and although he diagnosed a myriad of conditions, including Minamata disease and encephalopathy (2/7/2007), toxic effects of mercury and its compounds and inflammation of the brain (6/1/2007), toxic effects of mercury and its compounds, encephalopathy, autoimmune disease, and nutritional deficiency (6/19/2007), toxic effects of mercury and its compounds, encephalopathy, and autoimmune disease (10/2/2007), ROSSIGNOL did not diagnose autism.

26. During the same period of time from late December 2006 through mid-October 2007, and based on his diagnoses, Defendant ROSSIGNOL prescribed Methyl B-12 injectable medication (2/9/2007), Ferrous sulfate elixir (2/9/2007), DMPS suppositories for rectal chelation, Spironolactone (6/1/2007), NAC transdermal (6/1/2007), DMPS suppositories (5/5 and 6/4/2007), Vitamin C injectable vials (10/2/2007), NAC injectable vials (10/2/2007), EDTA injectable vials (10/2/2007), Nystatin (10/2/2007), oral Spironolactone (10/2/2007), Glutathione injectable vials (10/2/2007), and DMPS injectable vials (10/2/2007), some of which medications were manufactured, distributed, and/or sold to A.J.'s parent by Defendant CREATION'S OWN.

27. During Defendant ROSSIGNOL's telephone consultation with A.J.'s mother on October 2, 2007, Defendant recommended and advised that A.J.'s medical condition required IV chelation therapy and forwarded a protocol to Defendant USMAN for implementation of chelation therapy.

28. On or about October 24, 2007, Defendant USMAN commenced IV chelation therapy upon A.J. (based on her diagnosis of heavy metal toxicity) and following a protocol developed by Defendant ROSSIGNOL (based on his diagnosis of heavy metal toxicity). At Defendant USMAN's direction and under her supervision, chelation therapy was performed on A.J. using EDTA as the chelating agent combined with Vitamin C, GSH (a drug approved only for the treatment HIV) and DMPS (a non-FDA approved drug), on November 7, 2007, November 28, 2007, December 5, 2007, December 19, 2007, January 2, 2008, January 9, 2008, January 23, 2008,

January 30, 2008, February 13, 2008, February 28, 2008, March 11, 2008, March 27, 2008, April 3, 2008, April 10, 2008, April 17, 2008, April 24, 2008, April 30, 2008, May 8, 2008, May 14, 2008, May 21, 2008, May 29, 2008, June 5, 2008, June 11, 2008, September 17, 2008, October 1, 2008, October 8, 2008, October 16, 2008, October 22, 2008, October 30, 2008, November 6, 2008, November 12, 2008, November 19, 2008, December 11, 2008, December 17, 2008, January 5, 2009, January 19, 2009, February 5, 2009, February 16, 2009, March 4, 2009, March 19, 2009, and April 2, 2009.

29. From October 2007 through April 2009, when Defendant USMAN was administering IV chelation therapy to A.J. on a twice-a-month basis, A.J. was additionally being medicated by Defendants USMAN and ROSSIGNOL with supplements manufactured, distributed, and sold to A.J.'s parent by Defendant CREATION'S OWN, as well as Spironolactone, Nystatin, Methyl B-12, Singulair, Fer-in-Sol, N-Acetylcysteine, and DMPS suppositories.

30. During the same period of time, employees and/or agents of Defendant CREATION'S OWN wrote prescriptions for A.J. to have his blood work analyzed (10/2/2007, 12/9/2007, 11/20/2008, 3/27/2008), to have allergy testing performed (5/28/2008), and to have testing accomplished to rule out seizures (2/4/2009).

31. On or about April 23, 2007, June 4, 2007, July 3, 2007, October 2, 2007, December 19, 2007, and February 24, 2007, Defendant CREATION'S OWN requested urine toxic metal testing kits from Defendant DOCTOR'S DATA.

32. From October 2007 through April 2009, while A.J. was being administered IV chelation therapy, Defendant ROSSIGNOL continued to diagnose A.J. by means of telephone consultations with A.J.'s mother. With no in-person examinations, ROSSIGNOL variously diagnosed A.J.'s condition as toxic effect of mercury and its compounds, encephalopathy, and autoimmune disease (12/18/2007), with toxic effect of mercury and its compounds, encephalopathy, inflammation of the brain, and autoimmune disease (3/27/2008), with toxic effect of mercury and its compounds, encephalopathy, inflammation of the brain, and autoimmune disease (5/28/2008), and with toxic effect of mercury and its compounds, encephalopathy, inflammation of the brain, and autoimmune disease (11/20/2008), but made no diagnosis of autism.

33. At no time during the five-year period of time when Defendant USMAN treated A.J. with thirty-seven (37) IV chelation treatments, prescribed thirty (30) different supplements and various non-FDA approved drugs, and subjected A.J. to multiple urine toxic metal tests did Defendant USMAN make a substantive diagnosis, although she continued to treat A.J. for an alleged undefined biochemical imbalance.

34. At no time during the over two-year period of time when Defendant ROSSIGNOL treated A.J. by telephone consultation, authorizing chelation therapy, and prescribing multiple drugs for various medical conditions, did Defendant ROSSIGNOL make a diagnosis of autism.

35. The testing, assessments, and treatments described herein and performed by Defendants USMAN, TRUE HEALTH, ROSSIGNOL, CREATION'S OWN, and DOCTOR'S DATA were commenced when A.J. was less than two years old and continued until he was six years old, without any Defendant diagnosing A.J.'s condition as autism.

COUNT I

Medical Negligence Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

36. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

37. Pursuant to the retention of Defendant USMAN by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnosis, treatment and care of A.J.

38. On or about April 19, 2004, at the time that A.J.'s parent sought the professional services of Defendant USMAN for A.J., Defendant maintained her medical office and held herself out to the general public as a competent and skilled physician licensed by the Medical Board of Illinois, and A.J.'s parent relied upon said representations of skill and competency when retaining said Defendant to examine and treat him.

39. On or about April 19, 2004, and continuing through April 2, 2009, Defendant USMAN negligently failed to exercise the proper degree of knowledge, skill, and competence in examining, diagnosing, treating, and caring for A.J. by incompetently and negligently:

a) Treating A.J., a child only 2 years old when treatment commenced, with a myriad of medications, some excessive as they were non-FDA approved, and supplements which, per DSHEA, are foods and if used for diagnosis or treatment of disease, would be unapproved drugs;

b) Treating A.J., a child only 2 years old when treatment commenced, with a myriad of medications, some non-FDA approved, so-called supplements and dietary restrictions without proper analyses of his medical condition and without obtaining a substantive corroborated diagnosis;

c) Failing to establish treatment goals;

d) Failing to define A.J.'s alleged chemical imbalance, thereby rendering prescribed treatment methods illogical and progress indeterminable;

e) Diagnosing A.J. as suffering from heavy metal poisoning;

f) Recommending urine toxic metal testing for A.J. to be accomplished by co-Defendant DOCTOR'S DATA (with provoked testing) as necessary to confirm Defendant's diagnosis of heavy metal poisoning, although DOCTOR'S DATA compared Defendant's patient's specimens to a reference range that represented a healthy population under non-provoked conditions;

g) Collecting urine specimens from A.J. after administering a provoking agent;

h) Relying upon tests and testing results that Defendant knew reflected artificially elevated heavy metal levels in A.J.'s urine;

i) Relying upon testing results that she knew were not the proper or prudent standard for diagnosing lead or other metal poisoning; and

j) Performing chelation therapy, which was medically unnecessary and unjustified as A.J. did not suffer from heavy metal poisoning.

40. As a proximate result of the negligence of the Defendant USMAN, A.J. suffered bodily injury

as a result of the administration of unnecessary and medically unwarranted treatment, including but not limited to dangerous and invasive IV, rectal, oral, and transdermal chelation therapy treatments.

41. As a further proximate result of the negligence of the Defendant, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

42. As a further proximate result of the negligence of the Defendant, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

43. As a further proximate result of the negligence of the Defendant, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

44. As a further proximate result of the negligence of the Defendant, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

COUNT II

Medical Negligence Against True Health Medical Center

45. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

46. Pursuant to the retention of Defendant TRUE HEALTH by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnosis, treatment and care of A.J.

47. On or about April 19, 2004, at the time that A.J.'s parent sought the professional services of Defendant TRUE HEALTH for A.J., Defendant maintained its medical office and held itself out the general public as competent and skilled physicians licensed by the Medical Board of Illinois, and A.J.'s parent relied upon said representations of skill and competency when retaining said Defendant to examine and treat him.

48. On or about April 19, 2004, and continuing through April 2, 2009, Defendant TRUE HEALTH negligently failed to exercise the proper degree of knowledge, skill, and competence in examining, diagnosing, treating, and caring for A.J. by incompetently and negligently:

a) Treating A.J., a child only 2 years old when treatment commenced, with a myriad of medications, some excessive as they were non-FDA approved, and supplements which, per DSHEA, are foods and if used for diagnosis or treatment of disease, would be unapproved drugs;

b) Treating A.J., a child only 2 years old when treatment commenced, with a myriad of medications, some non-FDA approved, so-called supplements and dietary restrictions without proper analyses of his medical condition and without obtaining a substantive corroborated diagnosis;

- c) Failing to establish treatment goals;
- d) Failing to define A.J.'s alleged chemical imbalance, thereby rendering prescribed treatment methods illogical and progress indeterminable;
- e) Diagnosing A.J. as suffering from heavy metal poisoning;
- f) Recommending urine toxic metal testing for A.J. to be accomplished by co-Defendant DOCTOR'S DATA (with provoked testing) as necessary to confirm Defendant's diagnosis of heavy metal poisoning, although DOCTOR'S DATA compared Defendant's patient's specimens to a reference range that represented a healthy population under non-provoked conditions;
- g) Collecting urine specimens from A.J. after administering a provoking agent;
- h) Relying upon tests and testing results that Defendant knew reflected artificially elevated heavy metal levels in A.J.'s urine;
- i) Relying upon testing results that it knew were not the proper or prudent standard for diagnosing lead or other metal poisoning; and
- j) Performing chelation therapy, which was medically unnecessary and unjustified as A.J. did not suffer from heavy metal poisoning.

49. As a proximate result of the negligence of the Defendant TRUE HEALTH, A.J. suffered bodily injury as a result of the administration of unnecessary and medically unwarranted treatment, including but not limited to dangerous and invasive IV, rectal, oral, and transdermal chelation therapy treatments.

50. As a further proximate result of the negligence of the Defendant, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

51. As a further proximate result of the negligence of the Defendant, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

52. As a further proximate result of the negligence of the Defendant, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

53. As a further proximate result of the negligence of the Defendant, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

COUNT III

Lack of Informed Consent Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

54. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

55. Pursuant to the retention of Defendant USMAN by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnosis, treatment, and care of A.J.

56. On or about April 19, 2004, and continuing thereafter through April 2, 2009, in purported treatment of A.J.'s undiagnosed medical condition, Defendant USMAN negligently failed to disclose to A.J.'s parent the inherent and substantial risks involved in the administration of chelation therapy treatments, including but not limited to, infection, renal failure, and blood diseases, and negligently failed to obtain the informed consent of A.J.'s parent for chelation therapy on the dates identified herein in light of the undisclosed risks.

57. If A.J.'s parent had been adequately informed of the inherent and substantial risks associated with chelation therapy treatments, A.J.'s parent would not have consented to said treatments.

58. As these treatments were experimental, their use requires informed consent. Proper consent was not obtained. This subjected a small child to dangerous and unnecessary experimental treatments, and the consequences thereof.

59. As a proximate result of the wrongful conduct of Defendant USMAN, A.J. suffered bodily injury as a result of the administration of unnecessary, medical unwarranted, dangerous, and invasive IV, rectal, oral, and transdermal chelation therapy treatments.

60. As a further proximate result of the wrongful conduct of Defendant USMAN, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

61. As a further proximate result of the wrongful conduct of Defendant USMAN, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

62. As a further proximate result of the negligence of the Defendant, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

63. As a further proximate result of the negligence of the Defendant, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

COUNT IV

Lack of Informed Consent Against True Health Medical Center

64. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

65. Pursuant to the retention of Defendant TRUE HEALTH by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnosis,

treatment, and care of A.J.

66. On or about April 19, 2004, and continuing thereafter through April 2, 2009, in purported treatment of A.J.'s undiagnosed medical condition, Defendant TRUE HEALTH negligently failed to disclose to A.J.'s parent the inherent and substantial risks involved in the administration of chelation therapy treatments, including but not limited to, infection, renal failure, and blood diseases, and negligently failed to obtain the informed consent of A.J.'s parent for chelation therapy on the dates identified herein in light of the undisclosed risks.

67. If A.J.'s parent had been adequately informed of the inherent and substantial risks associated with chelation therapy treatments, A.J.'s parent would not have consented to said treatments.

68. As these treatments were experimental, their use requires informed consent. Proper consent was not obtained. This subjected a small child to dangerous and unnecessary experimental treatments, and the consequences thereof.

69. As a proximate result of the wrongful conduct of Defendant TRUE HEALTH, A.J. suffered bodily injury as a result of the administration of unnecessary, medical unwarranted, dangerous, and invasive IV, rectal, oral, and transdermal chelation therapy treatments.

70. As a further proximate result of the wrongful conduct of Defendant TRUE HEALTH, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

71. As a further proximate result of the wrongful conduct of Defendant TRUE HEALTH, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

72. As a further proximate result of the negligence of the Defendant, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

73. As a further proximate result of the negligence of the Defendant, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count V

Intentional Misrepresentation Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

74. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

75. On or about November 7, 2007, November 28, 2007, December 5, 2007, December 19, 2007, January 2, 2008, January 9, 2008, January 23, 2008, January 30, 2008, February 13, 2008, February 28, 2008, March 11, 2008, March 27, 2008, April 3, 2008, April 10, 2008, April 17, 2008, April 24, 2008, April 30, 2008, May 8, 2008, May 14, 2008, May 21, 2008, May 29, 2008, June 5, 2008, June 11, 2008, September 17, 2008, October 1, 2008, October 8, 2008, October 16, 2008, October 22, 2008, October 30, 2008, November 6, 2008, November 12, 2008, November

19, 2008, December 11, 2008, December 17, 2008, January 5, 2009, January 19, 2009, February 5, 2009, February 16, 2009, March 4, 2009, March 19, 2009, and April 2, 2009, Defendant USMAN falsely and fraudulently represented to A.J.'s parent that:

- a) A.J. had heavy metal poisoning;
- b) Chelation therapy treatments were necessary to treat heavy metal poisoning that was causing A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon proper and prudent standards for diagnosing metal poisoning; and
- d) Chelation therapy treatments would effectively lower A.J.'s alleged high metal toxicity levels.

76. The above representations made by Defendant USMAN were false. The true facts were that

- a) A.J. did not suffer from heavy metal poisoning;
- b) Chelation therapy treatments were neither medically necessary nor justified to treat A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon provoked testing that created artificially elevated heavy metal levels seen in the tests that did not accurately reflect the level of metals in A.J.'s body; and
- d) Chelation therapy did not lower A.J.'s alleged high metal toxicity levels because, in actuality, he did not have high metal toxicity levels.

77. A.J.'s parent, at the time Defendant USMAN made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on Defendant's representation, A.J.'s parent was induced to allow A.J. to undergo unnecessary and medically unjustified chelation therapy treatments that A.J.'s parent would not have agreed to had she known the actual facts.

78. As a proximate result of Defendant USMAN's representations, A.J. underwent unnecessary, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments.

79. As a further proximate result of Defendant USMAN's representations, A.J. sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

80. As a further proximate result of Defendant USMAN's representations, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

81. As a further proximate result of Defendant USMAN's representations, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

82. As a further proximate result of Defendant USMAN's representations, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count VI

Intentional Misrepresentation Against True Health Medical Center

83. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

84. On or about November 7, 2007, November 28, 2007, December 5, 2007, December 19, 2007, January 2, 2008, January 9, 2008, January 23, 2008, January 30, 2008, February 13, 2008, February 28, 2008, March 11, 2008, March 27, 2008, April 3, 2008, April 10, 2008, April 17, 2008, April 24, 2008, April 30, 2008, May 8, 2008, May 14, 2008, May 21, 2008, May 29, 2008, June 5, 2008, June 11, 2008, September 17, 2008, October 1, 2008, October 8, 2008, October 16, 2008, October 22, 2008, October 30, 2008, November 6, 2008, November 12, 2008, November 19, 2008, December 11, 2008, December 17, 2008, January 5, 2009, January 19, 2009, February 5, 2009, February 16, 2009, March 4, 2009, March 19, 2009, and April 2, 2009, Defendant TRUE HEALTH, by and through its officers, agents, and employees, falsely and fraudulently represented to A.J.'s parent that:

- a) A.J. had heavy metal poisoning;
- b) Chelation therapy treatments were necessary to treat heavy metal poisoning that was causing A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon proper and prudent standards for diagnosing metal poisoning; and
- d) Chelation therapy treatments would effectively lower A.J.'s alleged high metal toxicity levels.

85. The above representations made by Defendant TRUE HEALTH were false. The true facts were that:

- a) A.J. did not suffer from heavy metal poisoning;
- b) Chelation therapy treatments were neither medically necessary nor justified to treat A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon provoked testing that created artificially elevated heavy metal levels seen in the tests that did not accurately reflect the level of metals in A.J.'s body; and
- d) Chelation therapy did not lower A.J.'s alleged high metal toxicity levels because, in actuality, he did not have high metal toxicity levels.

86. A.J.'s parent, at the time Defendant TRUE HEALTH made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on Defendant's representation, A.J.'s parent was induced to allow A.J. to undergo unnecessary and medically unjustified chelation therapy treatments that A.J.'s parent would not have agreed to had

she known the actual facts.

87. As a proximate result of Defendant TRUE HEALTH's representations, A.J. underwent unnecessary, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments.

88. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

89. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

90. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

91. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count VII

Negligent Misrepresentation Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

92. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

93. On or about November 7, 2007, November 28, 2007, December 5, 2007, December 19, 2007, January 2, 2008, January 9, 2008, January 23, 2008, January 30, 2008, February 13, 2008, February 28, 2008, March 11, 2008, March 27, 2008, April 3, 2008, April 10, 2008, April 17, 2008, April 24, 2008, April 30, 2008, May 8, 2008, May 14, 2008, May 21, 2008, May 29, 2008, June 5, 2008, June 11, 2008, September 17, 2008, October 1, 2008, October 8, 2008, October 16, 2008, October 22, 2008, October 30, 2008, November 6, 2008, November 12, 2008, November 19, 2008, December 11, 2008, December 17, 2008, January 5, 2009, January 19, 2009, February 5, 2009, February 16, 2009, March 4, 2009, March 19, 2009, and April 2, 2009, Defendant USMAN falsely and fraudulently represented to A.J.'s parent that:

- a) A.J. had heavy metal poisoning;
- b) Chelation therapy treatments were necessary to treat heavy metal poisoning that was causing A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon proper and prudent standards for diagnosing metal poisoning; and
- d) Chelation therapy treatments would effectively lower A.J.'s alleged high metal toxicity levels.

94. The above representations made by Defendant USMAN were false. The true facts were that:

- a) A.J. did not suffer from heavy metal poisoning;
- b) Chelation therapy treatments were neither medically necessary nor justified to treat A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon provoked testing that created artificially elevated heavy metal levels seen in the tests that did not accurately reflect the level of metals in A.J.'s body; and
- d) Chelation therapy did not lower A.J.'s alleged high metal toxicity levels because, in actuality, he did not have high metal toxicity levels.

95. When Defendant made these representations, she had no reasonable ground for believing them to be true and made such material misrepresentations with the intention of inducing A.J.'s parent to allow A.J. to undergo unnecessary and medically unwarranted chelation therapy treatments, all to A.J.'s detriment and for Defendant's enrichment.

96. A.J.'s parent, at the time Defendant USMAN made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on these representations, A.J.'s parent was induced to allow A.J. to undergo unwarranted, medically unjustified, and dangerous IV, rectal, oral, and transdermal chelation therapy treatments, all of which A.J.'s parent would not have agreed to had she known the actual facts.

97. By holding herself out to the public and to A.J. as medical providers, Defendant USMAN was, at all relevant times, in the business of supplying information for the guidance of others, including A.J., and under a duty to communicate accurate information to A.J.'s parent.

98. As a proximate result of Defendant USMAN's representations, A.J. underwent unnecessary, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments.

99. As a further proximate result of Defendant USMAN's representations, A.J. sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

100. As a further proximate result of Defendant USMAN's representations, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

101. As a further proximate result of Defendant USMAN's representations, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

102. As a further proximate result of Defendant USMAN's representations, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count VIII

Negligent Misrepresentation Against True Health Medical Center

103. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

104. On or about November 7, 2007, November 28, 2007, December 5, 2007, December 19, 2007, January 2, 2008, January 9, 2008, January 23, 2008, January 30, 2008, February 13, 2008, February 28, 2008, March 11, 2008, March 27, 2008, April 3, 2008, April 10, 2008, April 17, 2008, April 24, 2008, April 30, 2008, May 8, 2008, May 14, 2008, May 21, 2008, May 29, 2008, June 5, 2008, June 11, 2008, September 17, 2008, October 1, 2008, October 8, 2008, October 16, 2008, October 22, 2008, October 30, 2008, November 6, 2008, November 12, 2008, November 19, 2008, December 11, 2008, December 17, 2008, January 5, 2009, January 19, 2009, February 5, 2009, February 16, 2009, March 4, 2009, March 19, 2009, and April 2, 2009, Defendant TRUE HEALTH, by and through its officers, agents, and employees, falsely and fraudulently represented to A.J.'s parent that

- a) A.J. had heavy metal poisoning;
- b) Chelation therapy treatments were necessary to treat heavy metal poisoning that was causing A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon proper and prudent standards for diagnosing metal poisoning; and
- d) Chelation therapy treatments would effectively lower A.J.'s alleged high metal toxicity levels.

105. The above representations made by Defendant TRUE HEALTH were false. The true facts were that:

- a) A.J. did not suffer from heavy metal poisoning;
- b) Chelation therapy treatments were neither medically necessary nor justified to treat A.J.'s medical condition;
- c) Defendant's diagnosis of heavy metal poisoning relied upon provoked testing that created artificially elevated heavy metal levels seen in the tests that did not accurately reflect the level of metals in A.J.'s body; and
- d) Chelation therapy did not lower A.J.'s alleged high metal toxicity levels because, in actuality, he did not have high metal toxicity levels.

106. When Defendant made these representations, it had no reasonable ground for believing them to be true and made such material misrepresentations with the intention of inducing A.J.'s parent to allow A.J. to undergo unnecessary and medically unwarranted chelation therapy treatments, all to A.J.'s detriment and for Defendant's enrichment.

107. A.J.'s parent, at the time Defendant TRUE HEALTH made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on these representations, A.J.'s parent was induced to allow A.J. to undergo unwarranted, medically unjustified, and dangerous IV, rectal, oral, and transdermal chelation therapy treatments, all of which A.J.'s parent would not have agreed to had she known the actual facts.

108. By holding itself out to the public and to A.J. as medical providers, Defendant TRUE HEALTH was, at all relevant times, in the business of supplying information for the guidance of others, including A.J., and under a duty to communicate accurate information to A.J.'s parent.

109. As a proximate result of Defendant TRUE HEALTH's representations, A.J. underwent unnecessary, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments.

110. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

111. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

112. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

113. As a further proximate result of Defendant TRUE HEALTH's representations, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.\

Count IX

Battery Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

114. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35, 75, and 76 as though fully set forth herein.

115. Defendant USMAN's fraudulent misrepresentation of material facts nullifies any consent A.J.'s parent may have given to the medical treatments recommended and performed by Defendant.

116. Defendant's medical touching of A.J. without consent constitutes a battery.

117. As a proximate result of the wrongful conduct of Defendant USMAN, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause A.J. mental, physical, and nervous pain and suffering.

118. As a further proximate result of Defendant USMAN's wrongful conduct, A.J. has sustained and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

119. As a further proximate result of Defendant USMAN's wrongful conduct, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

120. As a further proximate result of Defendant USMAN's wrongful conduct, A.J. will in the

future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count X

Battery Against True Health Medical Center

121. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35, 84, and 85 as though fully set forth herein.

122. Defendant TRUE HEALTH's fraudulent misrepresentation of material facts nullifies any consent A.J.'s parent may have given to the medical treatments recommended and performed by Defendant.

123. Defendant's medical touching of A.J. without consent constitutes a battery.

124. As a proximate result of the wrongful conduct of Defendant TRUE HEALTH, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause A.J. mental, physical, and nervous pain and suffering.

125. As a further proximate result of Defendant TRUE HEALTH's wrongful conduct, A.J. has sustained and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

126. As a further proximate result of Defendant TRUE HEALTH's wrongful conduct, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

127. As a further proximate result of Defendant TRUE HEALTH's wrongful conduct, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XI

Negligence Against Doctor's Data, Inc.

128. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

129. Pursuant to the agreement by Defendant DOCTOR'S DATA to accept A.J.'s specimens and to perform testing for potential toxic metals in A.J.'s system, Defendant owed a duty to A.J. to utilize valid testing and comparison methods.

130. The non-standardized method of testing that Defendant utilized on or about April 22, 2004, January 27, 2006, January 13, 2007, February 26, 2007, May 26, 2007, August 6, 2007, October

30, 2007, November 13, 2007, January 12, 2008, January 26, 2008, April 26, 2008, October 29, 2008, and March 27, 2009, wherein specimens were collected after the administration of a provoking agent and compared to unprovoked or unchallenged specimens was an improper method of determining whether A.J. had a potentially toxic level of heavy metals in his system.

131. On or about April 22, 2004, January 27, 2006, January 13, 2007, February 26, 2007, May 26, 2007, August 6, 2007, October 30, 2007, November 13, 2007, January 12, 2008, January 26, 2008, April 26, 2008, October 29, 2008, and March 27, 2009, Defendant negligently failed to exercise the proper degree of knowledge, skill, and competence in generating A.J.'s test results that determined that A.J. had excessive levels of heavy metals in his system based upon a comparison of provoked tests to unprovoked to unchallenged reference ranges.

132. By holding itself out to the public and to A.J. as a medical testing facility and providing medical test result reports, including suggested interpretations, Defendant DOCTOR'S DATA was, at all relevant times, in the business of supplying information for the guidance of others, including A.J.'s parent, and under a duty to communicate accurate information to A.J.'s parent.

133. As a proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. was induced to undergo unnecessary, medically unwarranted, dangerous, and expensive IV, rectal, oral, and transdermal chelation therapy treatments and improperly conducted and expensive laboratory testing.

134. As a further proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

135. As a further proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damages in an amount presently unascertainable.

136. As a further proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

137. As a further proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, DOCTOR'S DATA, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XII
Intentional Misrepresentation Against Doctor's Data, Inc.

138. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

139. On or about April 22, 2004, January 27, 2006, January 13, 2007, February 26, 2007, May 26, 2007, August 6, 2007, October 30, 2007, November 13, 2007, January 12, 2008, January 26, 2008, April 26, 2008, October 29, 2008, and March 27, 2009, Defendant DOCTOR'S DATA, by and

through its officers, agents, and employees, whose identities are presently unknown to A.J., produced reports pertaining to "urine toxic metals" testing pertaining to A.J., which, by their language, falsely and fraudulently represented that:

- a) The reference ranges utilized in testing A.J.'s metal levels were within the industry standard;
- b) No safe reference levels for toxic metals had been established; and
- c) The results of toxic metal testing were valid and accurate when urine collection was undertaken after administration of the provoking agent EDTA.

140. The above representations made by Defendant DOCTOR'S DATA were false. The true facts were that:

- a) The industry standard, when comparing provoked tests to non-provoked tests, was to use a much higher reference range;
- b) Safe reference levels for toxic metals had been established; and
- c) The results of provoked testing with the provoking agent EDTA would almost always show elevated levels of heavy metals.

141. A.J.'s parent, at the time Defendant DOCTOR'S DATA made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on Defendant's representation, A.J.'s parent was induced to allow A.J. to undergo unnecessary, medically unjustified, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments that A.J.'s parent would not have agreed to had she known the actual facts relating to the validity of the test results generated by Defendant.

142. As a proximate result of the representations of Defendant DOCTOR'S DATA, A.J. underwent unnecessary, dangerous, invasive, and expensive IV, rectal, oral, and transdermal chelation therapy treatments and improperly conducted and expensive laboratory testing.

143. As a further proximate result of the representations of Defendant DOCTOR'S DATA, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

144. As a further proximate result of the representations of Defendant DOCTOR'S DATA, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

145. As a further proximate result of the negligence of Defendant DOCTOR'S DATA, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

146. As a further proximate result of the representations of Defendant DOCTOR'S DATA, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, DOCTOR'S DATA, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and

costs.

Count XIII
Medical Negligence Against Daniel Rossignol, M.D.

147. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

148. Pursuant to the retention of Defendant ROSSIGNOL by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnosis, treatment and care of A.J.

149. On or about December 18, 2006, at the time A.J.'s parent sought the professional services of Defendant ROSSIGNOL, said Defendant maintained his medical office and held himself out to the general public as a competent, skilled, and licensed physician and A.J.'s parent relied upon said representations of skill and competency when retaining said Defendant to examine and treat him.

150. On or about December 18, 2006, and continuing thereafter through February 2, 2009, Defendant ROSSIGNOL negligently failed to exercise the proper degree of knowledge, skill, and competence in examining diagnosing, treating, and caring for A.J. by incompetently and negligently:

- a) Treating A.J. via telephone consultations with A.J.'s mother without ever seeing A.J. or examining A.J. in person;
- b) Diagnosing A.J. based on telephone consultations with A.J.'s mother without ever seeing A.J. or examining A.J. in person;
- c) Treating A.J., a child under the age of five (5) years old, with a myriad of medications, some of which were non-FDA approved, and supplements far in excess of what should have been prescribed and medically inappropriate for a child of A.J.'s young age;
- d) Treating A.J., a child under the age of five (5) years old, with a myriad of medications, some of which were non-FDA approved, and supplements without proper analyses of his medical condition and without obtaining a substantive corroborated diagnosis;
- e) Diagnosing A.J. as suffering from heavy metal poisoning;
- f) Recommending urine toxic metal testing to A.J. to be accomplished by co-Defendant DOCTOR'S DATA as necessary to confirm his diagnosis of heavy metal poisoning, although DOCTOR'S DATA compared Defendant's patient's specimens to a reference range that represented a healthy population under non-provoked conditions;
- g) Relying upon testing results that Defendant knew or should have known reflected artificially elevated heavy metal levels in A.J.'s urine;
- h) Relying upon testing results that Defendant knew or should have known were not the proper or prudent standard for diagnosing lead or other metal poisoning; and

i) Recommending IV chelation therapy for A.J. and providing the therapy protocol to the healthcare practitioner administering the IV chelation therapy to A.J.

151. As a proximate result of the negligence of Defendant ROSSIGNOL, A.J. suffered bodily injury as a result of the administration of unnecessary and medically unwarranted medical treatment, including but not limited to dangerous IV, rectal, oral, and transdermal chelation therapy treatments.

152. As a further proximate result of the negligence of Defendant ROSSIGNOL, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

153. As a further proximate result of the negligence of Defendant ROSSIGNOL, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

154. As a further proximate result of the negligence of Defendant ROSSIGNOL, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

155. As a further proximate result of the negligence of Defendant ROSSIGNOL, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, ROSSIGNOL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XIV

Lack of Informed Consent Against Daniel Rossignol, M.D.

156. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

157. Pursuant to the retention of Defendant ROSSIGNOL by A.J.'s parent to diagnose and treat his medical condition, said Defendant rendered professional medical services in the diagnoses, treatment, and care of A.J.

158. On or about December 18, 2006, and continuing thereafter through February 2, 2009, in purported treatment of A.J.'s medical condition, Defendant ROSSIGNOL negligently failed to disclose to A.J.'s parent that he was not licensed to practice medicine in the State of Illinois. Defendant further negligently failed to disclose to A.J.'s parent the inherent and substantial risks involved in the administration of the chelation therapy treatments that he recommended and for which he developed and provided the protocol, including but not limited to, infection, renal failure, and blood diseases, and negligently failed to obtain the informed consent of A.J.'s parent for chelation therapy on the dates identified herein in light of the undisclosed risks.

159. If A.J.'s parent had been adequately informed that Defendant ROSSIGNOL was not licensed to practice medicine in Illinois and had she been adequately informed of the inherent and substantial risks associated with chelation therapy treatments, A.J.'s parent would not have consented to said treatments. Treatment is experimental and requires informed consent.

160. As a proximate result of the wrongful conduct of Defendant ROSSIGNOL, A.J. suffered

bodily injury as a result of the administration of unnecessary, medically unwarranted, dangerous, and invasive IV, rectal, oral, and transdermal chelation therapy treatments.

161. As a further proximate result of the wrongful conduct of Defendant ROSSIGNOL, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

162. As a further proximate result of the wrongful conduct of Defendant ROSSIGNOL, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

163. As a further proximate result of the wrongful conduct of Defendant ROSSIGNOL, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

164. As a further proximate result of the wrongful conduct of Defendant ROSSIGNOL, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, ROSSIGNOL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XV

Intentional Misrepresentation Against Daniel Rossignol, M.D

165. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-35 as though fully set forth herein.

166. On or about December 18, 2006, June 1, 2007, June 19, 2007, October 2, 2007, December 18, 2007, March 27, 2008, May 28, 2008, and November 20, 2008, Defendant ROSSIGNOL falsely and fraudulently represented to A.J.'s parent that:

- a) A.J. was suffering from the toxic effect of mercury and its compounds;
- b) Chelation therapy treatments were necessary to treat the toxic effect of mercury and its compounds;
- c) Defendant's diagnoses of toxic effect of mercury and its compounds relied upon proper and prudent standards for diagnosing heavy metal toxicity; and
- d) Chelation therapy treatments would effectively lower A.J.'s alleged high metal toxicity levels.

167. The above representations made by Defendant ROSSIGNOL were false. The true facts were that:

- a) A.J. was not suffering from the toxic effect of mercury and its compounds;
- b) Chelation therapy treatments were not medically necessary nor justified to treat A.J.'s medical condition;
- c) Defendant's diagnoses of toxic effect of mercury and its compounds relied upon

provoked testing that created artificially elevated heavy metal levels and did not accurately reflect the level of mercury in A.J.'s body; and

d) Chelation therapy did not lower A.J.'s alleged high metal toxicity levels because, in actuality, he did not have high metal toxicity levels.

168. A.J.'s parent, at the time Defendant ROSSIGNOL made these representations, was ignorant of the falsity of Defendant's representations and believed them to be true. In justifiable reliance on Defendant's representation, A.J.'s parent was induced to allow A.J. to undergo unnecessary and medically unjustified chelation therapy treatments that A.J.'s parent would not have agreed to had she known the actual facts.

169. As a proximate result of the representations by Defendant ROSSIGNOL, A.J. underwent unnecessary, dangerous, invasive, and expensive IV chelation therapy treatments.

170. As a further proximate result of the representations by Defendant ROSSIGNOL, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

171. As a further proximate result of the representations by Defendant ROSSIGNOL, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

172. As a further proximate result of the representations by Defendant ROSSIGNOL, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

173. As a further proximate result of the representations by Defendant ROSSIGNOL, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendant, ROSSIGNOL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XVI

Civil Conspiracy Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D., True Health Medical Center, Daniel Rossignol, M.D., Creation's Own Corp., and Doctor's Data, Inc.

174. Plaintiff COMAN, as Father and Next Friend of A.J., realleges and incorporates by reference all of the allegations set forth in paragraphs 1-173 as though fully set forth herein.

175. A.J. and COMAN are informed and believe, and thereon allege, that at times presently unknown to A.J. and COMAN, Defendant TRUE HEALTH, by and through its owner, USMAN, Defendant DOCTOR'S DATA, by and through its staff, management, and/or personnel whose identities are presently unknown to A.J. and COMAN, Defendant ROSSIGNOL, and Defendant CREATION'S OWN, by and through its staff, management, and/or personnel whose identities are presently unknown to A.J. and COMAN, knowingly and wilfully conspired and agreed amongst themselves to perpetrate a fraud on the medical patients of Defendants USMAN, TRUE HEALTH, and ROSSIGNOL, including A.J., in order to justify unnecessary and medically unwarranted chelation therapy treatments and to induce the medical patients of Defendants USMAN, TRUE HEALTH, and ROSSIGNOL, including A.J. to agree to said treatment for Defendants' mutual benefit and unjust enrichment.

176. Pursuant to said conspiracy, and in furtherance thereof, Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN falsely and fraudulently represented to A.J.'s parent, on numerous occasions as described herein, that the results of toxic metal testing would be valid and accurate when urine collection was undertaken after administration of the provoking agent EDTA.

177. Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN demonstrated their agreement to perpetrate a fraud on A.J. and COMAN, by virtue of the fact that they knew that the representations made by them were false and that the results of provoked testing with the provoking agent EDTA, as administered to A.J., would always show elevated levels of heavy metals.

178. Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN demonstrated their agreement to perpetrate a fraud on A.J. and COMAN, by virtue of the fact that they made these material representations with the intent to induce A.J.'s parent to allow A.J. to undergo unnecessary, medically unwarranted, dangerous, and expensive chelation treatments recommended by Defendants USMAN, TRUE HEALTH, and ROSSIGNOL and performed by Defendants USMAN and TRUE HEALTH which, in turn, required intermittent repeat testing of potentially toxic metals in A.J.'s system by Defendant DOCTOR'S DATA, all to A.J.'s detriment and, by virtue thereof, to COMAN's detriment and to Defendants' mutual benefit and unjust enrichment.

179. Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN did the acts and things herein alleged pursuant to , and in the furtherance of, the conspiracy and the above-alleged agreement.

180. As a proximate result of the wrongful conduct of Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, A.J. was induced to undergo unnecessary, medically unwarranted, dangerous, and expensive IV rectal, oral, and transdermal chelation therapy treatments and improperly conducted and expensive laboratory testing.

181. As a further proximate result of the wrongful conduct of Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, A.J. has sustained injury to his health, strength, activity, and cognitive functioning, all of which injuries have caused, and continue to cause, A.J. mental, physical, and nervous pain and suffering.

182. As a further proximate result of the wrongful conduct of Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, A.J. has sustained, and will potentially sustain, disabling and permanent physical injuries, all to A.J.'s general damage in an amount presently unascertainable.

183. As a further proximate result of the wrongful conduct of Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, A.J. has incurred medical, hospital, and related expenses in a sum presently unascertainable.

184. As a further proximate result of the wrongful conduct of Defendants USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, A.J. will in the future incur medical, hospital, and related expenses, the exact nature and extent of which are currently unknown to A.J.

WHEREFORE, the Plaintiff, JAMES COMAN, as Father and Next Friend of AUGUST JAMES COMAN, a/k/a A.J. COMAN, a Minor, respectfully requests judgment against the Defendants, USMAN, TRUE HEALTH, ROSSIGNOL, DOCTOR'S DATA, and CREATION'S OWN, and each of them, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XVII

Intentional Infliction of Emotional Distress Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

185. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

186. Defendant USMAN subjected A.J. to medical treatment as described herein that was unnecessary, invasive, dangerous, and medically unwarranted.

187. The conduct of Defendant USMAN was intentional, malicious, and outrageous and done solely for the purpose of financially enriching Defendant for her own benefit, conduct that caused mental anguish and emotional distress to COMAN, who witnessed A.J.'s pain, discomfort, and mental anguish during the treatment performed by Defendant as described herein.

188. As a proximate result of the wrongful conduct of Defendant USMAN, COMAN suffered an impairment of his parental rights as represented by severe mental anguish and emotional distress.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, respectfully requests judgment against the Defendant, USMAN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XVIII

Intentional Infliction of Emotional Distress Against True Health Medical Center

189. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

190. Defendant TRUE HEALTH subjected A.J. to medical treatment as described herein that was unnecessary, invasive, dangerous, and medically unwarranted.

191. The conduct of Defendant TRUE HEALTH was intentional, malicious, and outrageous and done solely for the purpose of financially enriching Defendant for its own benefit, conduct that caused mental anguish and emotional distress to COMAN, who witnessed A.J.'s pain, discomfort, and mental anguish during the treatment performed by Defendant as described herein.

192. As a proximate result of the wrongful conduct of Defendant TRUE HEALTH, COMAN suffered an impairment of his parental rights as represented by severe mental anguish and emotional distress.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, respectfully requests judgment against the Defendant, TRUE HEALTH, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XIX

Intentional Infliction of Emotional Distress Against Daniel Rossignol, M.D.

193. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

194. Defendant ROSSIGNOL subjected A.J. to medical treatment as described herein that was unnecessary, invasive, dangerous, and medically unwarranted.

195. The conduct of Defendant ROSSIGNOL was intentional, malicious, and outrageous and done solely for the purpose of financially enriching Defendant for his own benefit, conduct that caused mental anguish and emotional distress to COMAN, who witnessed A.J.'s pain, discomfort, and mental anguish during the treatment performed by Defendant as described herein.

196. As a proximate result of the wrongful conduct of Defendant ROSSIGNOL, COMAN suffered an impairment of his parental rights as represented by severe mental anguish and emotional distress.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, respectfully requests judgment against the Defendant, ROSSIGNOL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XX

Intentional Infliction of Emotional Distress Against Creation's Own Corp.

197. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

198. Defendant CREATION'S OWN subjected A.J. to medical treatment as described herein that was unnecessary, invasive, dangerous, and medically unwarranted.

199. The conduct of Defendant CREATION'S OWN was intentional, malicious, and outrageous and done solely for the purpose of financially enriching Defendant for its own benefit, conduct that caused mental anguish and emotional distress to COMAN, who witnessed A.J.'s pain, discomfort, and mental anguish during the treatment performed by Defendant as described herein.

200. As a proximate result of the wrongful conduct of Defendant CREATION'S OWN, COMAN suffered an impairment of his parental rights as represented by severe mental anguish and emotional distress.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, respectfully requests judgment against the Defendant, CREATION'S OWN, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

Count XXI

Intentional Infliction of Emotional Distress Against Doctor's Data, Inc.

201. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

202. Defendant DOCTOR'S DATA subjected A.J. to medical treatment as described herein that was unnecessary, invasive, dangerous, and medically unwarranted.

203. The conduct of Defendant DOCTOR'S DATA was intentional, malicious, and outrageous and done solely for the purpose of financially enriching Defendant for its own benefit, conduct that

caused mental anguish and emotional distress to COMAN, who witnessed A.J.'s pain, discomfort, and mental anguish during the treatment performed by Defendant as described herein.

204. As a proximate result of the wrongful conduct of Defendant DOCTOR'S DATA, COMAN suffered an impairment of his parental rights as represented by severe mental anguish and emotional distress.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, respectfully requests judgment against the Defendant, DOCTOR'S DATA, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and costs.

COUNT XXII

Family Expense Act Against Anjum I. Usman, M.D., a/k/a Anju I. Usman, M.D.

205. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

206. That at the time of the injury, and at all relevant times herein, A.J. was in the care of his father and next friend, Plaintiff, COMAN, for whose benefit this action is brought.

207. That by reason of the foregoing, the Plaintiff, COMAN, as legal guardian of A.J., has become obligated for substantial sums of money in reasonable medical expenses, pursuant to the Family Expense Act, 750 ILCS 65/15.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, prays for judgment against the Defendant, USMAN, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) and costs.

COUNT XXIII

Family Expense Act Against True Health Medical Center

208. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

209. That at the time of the injury, and at all relevant times herein, A.J. was in the care of his father and next friend, Plaintiff, COMAN, for whose benefit this action is brought.

210. That by reason of the foregoing, the Plaintiff, COMAN, as legal guardian of A.J., has become obligated for substantial sums of money in reasonable medical expenses, pursuant to the Family Expense Act, 750 ILCS 65/15.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, prays for judgment against the Defendant, TRUE HEALTH, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) and costs.

COUNT XXIV

Family Expense Act Against Daniel Rossignol, M.D.

211. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

212. That at the time of the injury, and at all relevant times herein, A.J. was in the care of his father and next friend, Plaintiff, COMAN, for whose benefit this action is brought.

213. That by reason of the foregoing, the Plaintiff, COMAN, as legal guardian of A.J., has become obligated for substantial sums of money in reasonable medical expenses, pursuant to the Family Expense Act, 750 ILCS 65/15.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, prays for judgment against the Defendant, ROSSIGNOL, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) and costs.

COUNT XXV

Family Expense Act Against Creation's Own Corp.

214. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

215. That at the time of the injury, and at all relevant times herein, A.J. was in the care of his father and next friend, Plaintiff, COMAN, for whose benefit this action is brought.

216. That by reason of the foregoing, the Plaintiff, COMAN, as legal guardian of A.J., has become obligated for substantial sums of money in reasonable medical expenses, pursuant to the Family Expense Act, 750 ILCS 65/15.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, prays for judgment against the Defendant, CREATION'S OWN, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) and costs.

COUNT XXVI

Family Expense Act Against Doctor's Data, Inc.

217. Plaintiff COMAN, as an individual, realleges and incorporates by reference all of the allegations set forth in paragraphs 1-184 as though fully set forth herein.

218. That at the time of the injury, and at all relevant times herein, A.J. was in the care of his father and next friend, Plaintiff, COMAN, for whose benefit this action is brought.

219. That by reason of the foregoing, the Plaintiff, COMAN, as legal guardian of A.J., has become obligated for substantial sums of money in reasonable medical expenses, pursuant to the Family Expense Act, 750 ILCS 65/15.

WHEREFORE, the Plaintiff, JAMES COMAN, Individually, prays for judgment against the Defendant, DOCTOR'S DATA, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) and costs.

Respectfully submitted,

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David J. Wilzig

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