

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

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.

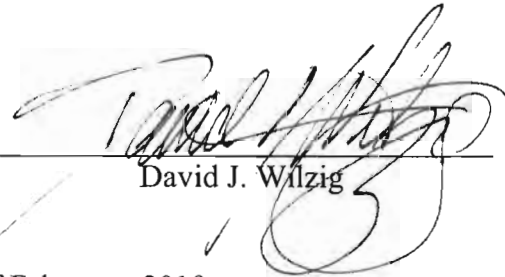
Plaintiff Demands a Jury Trial

§ 2-622 AFFIDAVIT OF ATTORNEY

I, David J. Wilzig, after first being duly sworn on oath, do hereby state that the following facts are true and correct:

1. I am an attorney licensed to practice law before all courts of the State of California, various federal courts, and intend to petition this Court to be admitted *pro hac vice* in the State of Illinois for the purposes of litigating this case. I am counsel of record for James Coman, Individually and as Father and Next Friend of August James Coman, a/k/a A.J. Coman, a Minor. All of the matters stated herein are of my personal knowledge, and if called upon to do so, I could and would testify competently thereto.
2. Affiant has consulted with and reviewed the facts of the case with a health professional who the affiant reasonably believes is knowledgeable in the relevant issues involved in this particular action, practices or has practiced within the last six years in the same area of health care or medicine that is at issue in this particular action, and is qualified by experience in the subject of this case.
3. Affiant concludes, based on consulting with the above-described individual, that there are reasonable and meritorious causes for filing of this action.
4. The reviewing health professional, licensed to practice medicine in all its branches, has determined in written reports, after a review of the medical records described therein, that there are reasonable and meritorious causes for the filing of such action. Said reports are attached hereto.

FURTHER AFFIANT SAYETH NOT.



David J. Wilzig

~~SUBSCRIBED and SWORN before me this ____ day of February, 2010.~~

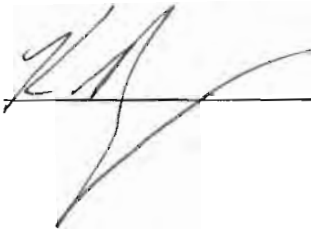
~~_____
NOTARY PUBLIC~~

Please See Attached

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 3rd day of March, 2010, by David J. Wilzig, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature



(Seal)



February 7, 2010

To the Honorable Judge
Circuit Court of Cook County Illinois

RE: Coman v. Usman et al

Affidavit Regarding Dr. Anjum I. Usman

I provide this written report with respect to the complaint in the Circuit Court of Cook County, Illinois filed by August James Coman (A.J. Coman), a minor, by his natural father and next friend, James Coman with respect to defendants Anjum I. Usman, MD, (a.k.a. Anju I. Usman, M.D.), True Health Medical Center of Illinois, Daniel, Rossignol, MD., Creation's Own Corporation, and Doctor's Data, Inc.

I am a physician licensed to practice medicine in the Commonwealth of Massachusetts, with an unrestricted license # [REDACTED], and am currently president and medical director of the [REDACTED], located at [REDACTED] Massachusetts [REDACTED]. I see and manage patients on a daily basis, and am also a faculty member of [REDACTED] School of Medicine in the Department of Medicine. I am the author of numerous scientific papers, including two recent papers on chelation treatments published in respected peer-reviewed journals. My bibliography includes a college textbook on Consumer Health, and I have testified before the United State Senate and the US FDA on matters of health care.

I received my A.B. degree (cum laude) in biology from [REDACTED] and earned my D.D.S. and my Ph.D. in cell biology and anatomy from [REDACTED]. Thereafter I undertook post-doctoral study in cell biology and tissue culture at [REDACTED] Medical School, and subsequently became a faculty member of that institution. After teaching and doing research for twelve years, I earned my M.D. from [REDACTED] University and completed a residency in internal medicine at an affiliated hospital. In medicine, I have 20 years of clinical experience in primary care, emergency medicine, internal medicine and occupational medicine. Over the last 25 years, I have been retained by more than 20 state licensing boards, federal agencies, insurance companies, and law enforcement agencies to offer expert opinion as to quality of care and standard of care issues in the practice of medicine.

I believe I am qualified by my experience with issues relating to standard of care, methods, procedures and treatments relevant to the allegations at issue in this case. Thus, I am, by this document, rendering my opinion that I believe the claims made in this case to hold enough merit to be reviewed by the Court. For this opinion I have reviewed the medical records and other relevant materials relating to the issues raised in the complaint in this case. I have made similar such opinions through affidavits several times in the past with other cases in various jurisdictions. My experience also includes having twice been appointed, along with a judge and a member of the bar, by the Superior Court of the Commonwealth of Massachusetts, to medical malpractice review tribunals to screen cases for merit before they can proceed. .

Based on my review of the medical records, as supplied, and other relevant materials, as well as my training, experience and expertise in the fields of internal medicine and emergency medicine, I have determined that a reasonable and meritorious cause for filing the complaint in this matter exists as it relates to the claims brought against defendant Anju Usman, M.D.

Some of the reasons I have made this determination as to defendant Anju Usman, M.D. include marked deviations from the standard of care expected of a reasonable physician:

1. Dr. Usman failed to make proper diagnoses of the plaintiff, A.J. Coman. Dr. Usman failed to make a differential diagnosis of the plaintiff, A. J. Coman, and consider alternative diagnoses.
2. Despite failing to make a proper diagnosis, Dr. Usman began a series of illogical, unsafe, and unwarranted "treatments". There were no stated goals for these treatments. There were no clinical end points for these treatments. There was not adequate monitoring of the progress of these treatments.
3. Dr. Usman used improper testing methods, including hair and provoked urine analysis, and determined that A.J. Coman had heavy metal intoxication. Dr. Usman's own records and findings speak to the contrary. Based on the improper diagnosis of heavy metal intoxication, Dr. Usman exposed the child, A.J. Coman to dangerous and illicit drugs by multiple routes, for prolonged periods of time. These included chelation agents, including DMPS. A.J. Coman did not have symptoms or a diagnosis warranting chelation by any agent.
4. Without reasonable medical justification Dr. Usman gave the drug spironolactone to A.J. Coman for prolonged periods of time. This drug is dangerous for children and is mutagenic.
5. Despite a normal selenium level, Dr. Usman unnecessarily and repeatedly prescribed selenium supplements. Eventually A.J. Coman showed high levels of selenium, which can be toxic, and cause permanent damage.. Dr. Usman failed to recognize this fact and continued to prescribe selenium.
6. Protracted chelation sessions using intravenous chelation drugs were unnecessary and medically not indicated. These agents concentrated heavy metals, such as lead, in A.J. Coman's circulating blood and his kidneys. High concentrations of lead in the kidneys can cause kidney damage. Despite labs values which showed high "post treatment" lead levels, Dr. Usman

- continued her alleged "treatments" which continued to produce these high levels, exposing A. J. Coman's kidneys, and other organs, to further insult with each episode.
7. Dr. Usman presented improper consent forms to A.J. Coman's parents. These forms did not present the true risks and/or benefits of any tests or treatments. The forms were vague and non-specific. The forms also indicated that A.J. Coman would receive experimental drugs, however the context in which these were given were improper. The experimental drugs were not overseen by the US FDA, and did not have an Investigational New Drug License. The use of these drugs was not part of a study. The use of these drugs was not overseen by an institutional review board for the protection of human subjects. The experimental drugs included multiple dietary agents improperly used to diagnose or treat human diseases and conditions, the agent DMPS, and multiple other agents.
 8. Dr. Usman subjected A.J. Coman to Hyperbaric Oxygen Treatments and sweat saunas without clinical justification or proper monitoring. Both can be extremely dangerous to a small child causing lung damage, brain damage, and other physiological insults.
 9. Dr. Usman made false statements on her consent forms regarding DMPS, and other chelation agents, as being "standard therapy", or being legitimate.
 10. Dr. Usman subjected A.J. Coman to at least 33 intravenous treatments, none of which were necessary or medically indicated.
 11. Despite an alleged diagnosis of heavy metal intoxication, Dr. Usman failed to seek competent referral for advice and treatment, and failed to report, as required, this diagnosis to the State of Illinois, Department of Health.
 12. Dr. Usman collaborated with other defendants regarding improper treatments and tests. Dr. Usman should have recognized that their tests and treatments were improper.
 13. Dr. Usman's records were often inadequate and would not enable another physician to assume care and be able to understand her rationale, methods, treatments expected outcomes, and end points.

I have further concluded, based upon my review of the medical record and other relevant materials, that a reasonable health professional would have informed the plaintiff's parents of the consequences and inherent and substantial risks involved in the administration of chelation therapy treatments.

Respectfully,



February 7, 2010

To the Honorable Judge
Circuit Court of Cook County Illinois

RE: Coman v. Usman et al

Affidavit Regarding True Health Medical Center

I provide this written report with respect to the complaint in the Circuit Court of Cook County, Illinois filed by August James Coman (A.J. Coman), a minor, by his natural father and next friend, James Coman with respect to defendants Anjum I. Usman, MD, (a.k.a. Anju I. Usman, M.D.), True Health Medical Center of Illinois, Daniel, Rossignol, MD., Creation's Own Corporation, and Doctor's Data, Inc.

I am a physician licensed to practice medicine in the Commonwealth of Massachusetts, with an unrestricted license # [REDACTED], and am currently president and medical director of the [REDACTED], located at [REDACTED], Massachusetts [REDACTED]. I see and manage patients on a daily basis, and am also a faculty member of [REDACTED] School of Medicine in the Department of Medicine. I am the author of numerous scientific papers, including two recent papers on chelation treatments published in respected peer-reviewed journals. My bibliography includes a college textbook on Consumer Health, and I have testified before the United State Senate and the US FDA on matters of health care.

I received my A.B. degree (cum laude) in biology from [REDACTED] and earned my D.D.S. and my Ph.D. in cell biology and anatomy from [REDACTED]. Thereafter I undertook post-doctoral study in cell biology and tissue culture at [REDACTED] Medical School, and subsequently became a faculty member of that institution. After teaching and doing research for twelve years, I earned my M.D. from [REDACTED] University and completed a residency in internal medicine at an affiliated hospital. In medicine, I have 20 years of clinical experience in primary care, emergency medicine, internal medicine and occupational medicine. Over the last 25 years, I have been retained by more than 20 state licensing boards, federal agencies, insurance companies, and law enforcement agencies to offer expert opinion as to quality of care and standard of care issues in the practice of medicine.

I believe I am qualified by my experience with issues relating to standard of care, methods, procedures and treatments relevant to the allegations at issue in this case. Thus, I am, by this document, rendering my opinion that I believe the claims made in this case to hold enough merit to be reviewed by the Court. For this opinion I have reviewed the medical records and other relevant materials relating to the issues raised in the complaint in this case. I have made similar such opinions through affidavits several times in the past with other cases in various jurisdictions. My experience also includes having twice been appointed, along with a judge and a member of the bar, by the Superior Court of the Commonwealth of Massachusetts, to medical malpractice review tribunals to screen cases for merit before they can proceed. .

Based on my review of the medical records, as supplied, and other relevant materials, as well as my training, experience and expertise in the fields of internal medicine and emergency medicine, I have determined that a reasonable and meritorious cause for filing the complaint in this matter exists as it relates to the claims brought against defendant True Health Medical Center.

One of the reasons I have made this determination as to defendant True Health Medical Center include the doctrine of Res Ipsa Loquitur that negligence has occurred in the course of medical treatment. It is my understanding that True Health Medical Center is an embodiment of the practice Dr. Anju Usman, and is under the control of Dr. Usman. The points conveyed in my Affidavit regarding Dr. Usman thus also apply to this Affidavit (#1-13 below). Additionally it is my opinion that True Health Medical Center engaged in at least the conduct described below in #14-19.

1. Dr. Usman failed to make proper diagnoses of the plaintiff, A.J. Coman. Dr. Usman failed to make a differential diagnosis of the plaintiff, A. J. Coman, and consider alternative diagnoses.
2. Despite failing to make a proper diagnosis, Dr. Usman began a series of illogical, unsafe, and unwarranted "treatments". There were no stated goals for these treatments. There were no clinical end points for these treatments. There was not adequate monitoring of the progress of these treatments.
3. Dr. Usman used improper testing methods, including hair and provoked urine analysis, and determined that A.J. Coman had heavy metal intoxication. Dr. Usman's own records and findings speak to the contrary. Based on the improper diagnosis of heavy metal intoxication, Dr. Usman exposed the child, A.J. Coman to dangerous and illicit drugs by multiple routes, for prolonged periods of time. These included chelation agents, including DMPS. A.J. Coman did not have symptoms or a diagnosis warranting chelation by any agent.
4. Without reasonable medical justification Dr. Usman gave the drug spironolactone to A.J. Coman for prolonged periods of time. This drug is dangerous for children and is mutagenic.
5. Despite a normal selenium level, Dr. Usman unnecessarily and repeatedly prescribed selenium supplements. Eventually A.J. Coman showed high levels of selenium, which can be toxic, and cause permanent damage.. Dr. Usman failed to recognize this fact and continued to prescribe selenium.

6. Protracted chelation sessions using intravenous chelation drugs were unnecessary and medically not indicated. These agents concentrated heavy metals, such as lead, in A.J. Coman's circulating blood and his kidneys. High concentrations of lead in the kidneys can cause kidney damage. Despite labs values which showed high "post treatment" lead levels, Dr. Usman continued her alleged "treatments" which continued to produce these high levels, exposing A. J. Coman's kidneys, and other organs, to further insult with each episode.
7. Dr. Usman presented improper consent forms to A.J. Coman's parents. These forms did not present the true risks and/or benefits of any tests or treatments. The forms were vague and non-specific. The forms also indicated that A.J. Coman would receive experimental drugs, however the context in which these were given were improper. The experimental drugs were not overseen by the US FDA, and did not have an Investigational New Drug License. The use of these drugs was not part of a study. The use of these drugs was not overseen by an institutional review board for the protection of human subjects. The experimental drugs included multiple dietary agents improperly used to diagnose or treat human diseases and conditions, the agent DMPS, and multiple other agents.
8. Dr. Usman subjected A.J. Coman to Hyperbaric Oxygen Treatments and sweat saunas without clinical justification or proper monitoring. Both can be extremely dangerous to a small child causing lung damage, brain damage, and other physiological insults.
9. Dr. Usman made false statements on her consent forms regarding DMPS, and other chelation agents, as being "standard therapy", or being legitimate. .
10. Dr. Usman subjected A.J. Coman to at least 33 intravenous treatments, none of which were necessary or medically indicated.
11. Despite an alleged diagnosis of heavy metal intoxication, Dr. Usman failed to seek competent referral for advice and treatment, and failed to report, as required, this diagnosis to the State of Illinois, Department of Health.
12. Dr. Usman collaborated with other defendants regarding improper treatments and tests. Dr. Usman should have recognized that their tests and treatments were improper.
13. Dr. Usman's records were often inadequate and would not enable another physician to assume care and be able to understand her rationale, methods, treatments expected outcomes, and end points.
14. True Health Medical Center restricted the diet of a growing child without medical justification.
15. Medical records of True Health Center with regard to A.J. Coman appear to have been altered, thus obfuscating the true nature of treatment(s).
16. Human experimentation was conducted on A.J. Coman without informed consent on multiple days.
17. True Health Medical Center used its power over the parent(s) of A. J. Coman to coerce them into payment for treatments that were unnecessary; True Health Medical Center used its power of the parent(s) of A. J. Coman to coerce them into cash payments for items that may have been covered by health insurance. True Health Medical Center used its financial schemes to hide the true nature of what was being done from others.
18. Consent forms of True Health Medical Center were improper and did not explain the true risks or benefits, if any, of its treatments.

19. True Health Medical Center charged the parents of A.J. Coman for a number of medically useless, unwarranted, costly, and unapproved tests that were neither designed to elicit a diagnosis or properly monitor a treatment.

I have further concluded, based upon my review of the medical record and other relevant materials, that a reasonable health facility would have informed the plaintiff's parents of the consequences and inherent and substantial risks involved in the administration of chelation therapy treatments.

Respectfully,



February 7, 2010

To the Honorable Judge
Circuit Court of Cook County Illinois

RE: Coman v. Rossignol et al

Affidavit Regarding Daniel Rossignol, MD

I provide this written report with respect to the complaint in the Circuit Court of Cook County, Illinois filed by August James Coman (A.J. Coman), a minor, by his natural father and next friend, James Coman with respect to defendants Anjum I. Usman, MD, (a.k.a. Anju I. Usman, M.D.), True Health Medical Center of Illinois, Daniel, Rossignol, MD., Creation's Own Corporation, and Doctor's Data, Inc.

I am a physician licensed to practice medicine in the Commonwealth of Massachusetts, with an unrestricted license # [REDACTED] and am currently president and medical director of the [REDACTED], located at [REDACTED] Massachusetts [REDACTED]. I see and manage patients on a daily basis, and am also a faculty member of [REDACTED] School of Medicine in the Department of Medicine. I am the author of numerous scientific papers, including two recent papers on chelation treatments published in respected peer-reviewed journals. My bibliography includes a college textbook on Consumer Health, and I have testified before the United State Senate and the US FDA on matters of health care.

I received my A.B. degree (cum laude) in biology from [REDACTED] and earned my D.D.S. and my Ph.D. in cell biology and anatomy from [REDACTED]. Thereafter I undertook post-doctoral study in cell biology and tissue culture at [REDACTED] Medical School, and subsequently became a faculty member of that institution. After teaching and doing research for twelve years, I earned my M.D. from [REDACTED] University and completed a residency in internal medicine at an affiliated hospital. In medicine, I have 20 years of clinical experience in primary care, emergency medicine, internal medicine and occupational medicine. Over the last 25 years, I have been retained by more than 20 state licensing boards, federal agencies, insurance companies, and law enforcement agencies to offer expert opinion as to quality of care and standard of care issues in the practice of medicine.

I believe I am qualified by my experience with issues relating to standard of care, methods, procedures and treatments relevant to the allegations at issue in this case. Thus, I am, by this document, rendering my opinion that I believe the claims made in this case to hold enough merit to be reviewed by the Court. For this opinion I have reviewed the medical records and other relevant materials relating to the issues raised in the complaint in this case. I have made similar such opinions through affidavits several times in the past with other cases in various jurisdictions. My experience also includes having twice been appointed, along with a judge and a member of the bar, by the Superior Court of the Commonwealth of Massachusetts, to medical malpractice review tribunals to screen cases for merit before they can proceed. .

Based on my review of the medical records, as supplied, and other relevant materials, as well as my training, experience and expertise in the fields of internal medicine and emergency medicine, I have determined that a reasonable and meritorious cause for filing the complaint in this matter exists as it relates to the claims brought against defendant Daniel Rossignol, M.D.

Some of the reasons I have made this determination as to defendant Daniel Rossignol, M.D. include marked deviations from the standard of care expected of a reasonable physician. Some of these are outlined below. Additionally the doctrine of Res Ipsa Loquitur applies in that Dr. Rossignol was diagnosing and treating a patient he never met in another state.

1. Dr. Rossignol diagnosed and treated plaintiff A.J. Coman for more than two years without meeting the patient. Dr. Rossignol was in Florida and A.J. Coman was in Illinois. In some instances Dr. Rossignol acted alone, or as part of Creation's Own, Inc., and in some instances Dr. Rossignol acted in concert with co-defendants Dr. Usman, True Health Medical Center, and Doctor's Data, Inc.
2. Dr. Rossignol failed to make proper diagnoses of the plaintiff, A.J. Coman. Dr. Rossignol failed to make a differential diagnosis of the plaintiff, A. J. Coman, and consider alternative diagnoses.
3. Despite failing to make a proper diagnosis, Dr. Rossignol began a series of illogical, unsafe, and unwarranted "treatments". There were no stated goals for these treatments. There were no clinical end points for these treatments. There was not adequate monitoring of the progress of these treatments.
4. Dr. Rossignol used improper testing methods, including hair and provoked urine analysis, and determined that A.J. Coman had heavy metal intoxication (Mercury Poisoning/Minamata Disease). Based on the improper diagnosis of heavy metal intoxication, Dr. Rossignol exposed the child, A.J. Coman to dangerous and illicit drugs by multiple routes, for prolonged periods of time. These included chelation agents, including DMPS, Glutathione, and N-acetyl cystine. (NAC). . A.J. Coman did not have symptoms or a diagnosis warranting use of any of these agents.
5. Without reasonable medical justification Dr. Rossignol gave the drug spironolactone to A.J. Coman for prolonged periods of time. This drug is dangerous for children and is mutagenic.
6. Without reasonable medical justification Dr. Rossignol arranged for A.J.

- Coman to receive Intravenous Immune Globulin (IVIG). This agent is an unsterilized human serum derivative and carries with it risks of a number of blood-borne diseases, including HIV infection and Jakob-Creutzfeldt Disease (and similar conditions such as Mad Cow Disease).
7. Despite any medical justification Dr. Rossignol unnecessarily and repeatedly prescribed oxytoxin, DMPS (an unapproved drug), NAC, Glutathione, and sprionolactone. Dr. Rossignol did not adequately monitor the use or results of any of these agents
 8. Protracted use of chelation agents concentrate heavy metals in circulating blood and the kidneys. High concentrations of lead in the kidneys can cause kidney damage. Dr. Rossignol failed to tell or warn the parents of these risks..
 9. Despite an alleged diagnosis of heavy metal intoxication, Dr. Rossignol failed to seek competent referral for advice and treatment, and failed to report, as required, this diagnosis to the State of Illinois, Department of Health.
 10. Dr. Rossignol collaborated with other defendants regarding improper treatments and tests. Dr. Rossignol should have recognized that their tests and treatments were improper and reported them to regulatory authorities. .
 11. Dr. Rossignol's records were often inadequate and would not enable another physician to assume care and be able to understand her rationale, methods, treatments expected outcomes, and end points.

I have further concluded, based upon my review of the medical record and other relevant materials, that a reasonable health professional would, at a minimum, have informed the plaintiff's parents of the consequences and inherent and substantial risks involved in the administration of chelation therapy treatments, and sprionolactone..

Respectfully,

[REDACTED]

[REDACTED]

February 7, 2010

To the Honorable Judge
Circuit Court of Cook County Illinois

RE: Coman v. Rossignol et al

Affidavit Regarding Creation's Own Corporation

I provide this written report with respect to the complaint in the Circuit Court of Cook County, Illinois filed by August James Coman (A.J. Coman), a minor, by his natural father and next friend, James Coman with respect to defendants Anjum I. Rossignol, MD, (a.k.a. Anju I. Rossignol, M.D.), True Health Medical Center of Illinois, Daniel, Rossignol, MD., Creation's Own Corporation, and Doctor's Data, Inc.

I am a physician licensed to practice medicine in the Commonwealth of Massachusetts, with an unrestricted license # [REDACTED], and am currently president and medical director of the [REDACTED] located at [REDACTED] Massachusetts [REDACTED]. I see and manage patients on a daily basis, and am also a faculty member of [REDACTED] School of Medicine in the Department of Medicine. I am the author of numerous scientific papers, including two recent papers on chelation treatments published in respected peer-reviewed journals. My bibliography includes a college textbook on Consumer Health, and I have testified before the United State Senate and the US FDA on matters of health care.

I received my A.B. degree (cum laude) in biology from [REDACTED] and earned my D.D.S. and my Ph.D. in cell biology and anatomy from [REDACTED]. Thereafter I undertook post-doctoral study in cell biology and tissue culture at [REDACTED] Medical School, and subsequently became a faculty member of that institution. After teaching and doing research for twelve years, I earned my M.D. from [REDACTED] University and completed a residency in internal medicine at an affiliated hospital. In medicine, I have 20 years of clinical experience in primary care, emergency medicine, internal medicine and occupational medicine. Over the last 25 years, I have been retained by more than 20 state licensing boards, federal agencies, insurance companies, and law enforcement agencies to offer expert opinion as to quality of care and standard of care issues in the practice of medicine.

I believe I am qualified by my experience with issues relating to standard of care, methods, procedures and treatments relevant to the allegations at issue in this case. Thus, I am, by this document, rendering my opinion that I believe the claims made in this case to hold enough merit to be reviewed by the Court. For this opinion I have reviewed the medical records and other relevant materials relating to the issues raised in the complaint in this case. I have made similar such opinions through affidavits several times in the past with other cases in various jurisdictions. My experience also includes having twice been appointed, along with a judge and a member of the bar, by the Superior Court of the Commonwealth of Massachusetts, to medical malpractice review tribunals to screen cases for merit before they can proceed. .

Based on my review of the medical records, as supplied, and other relevant materials, as well as my training, experience and expertise in the fields of internal medicine and emergency medicine, I have determined that a reasonable and meritorious cause for filing the complaint in this matter exists as it relates to the claims brought against defendant Creation's Own Corporation.

Some of the reasons I have made this determination as to defendant Daniel Rossignol, M.D. include marked deviations from the standard of care expected of a reasonable physician. Dr. Rossignol was as part of, and working for Defendant Creation's Own when he treated Plaintiff A. J. Coman. Thus the alleged acts of Dr. Daniel Rossignol are understood to also be the acts of Defendant Creation's Own Corporation. Some of these are outlined below. Additionally the doctrine of Res Ipsa Loquitur applies in that Creation's Own Corporation was, among other things, a medical practice, through which Plaintiff A. J. Coman was treated. As part of Creation's own Corporation Dr. Rossignol was diagnosing and treating a patient he had not met in another state.

1. Dr. Rossignol diagnosed and treated plaintiff A.J. Coman for more than two years without meeting the patient. Dr. Rossignol was in Florida and A.J. Coman was in Illinois. In some instances Dr. Rossignol acted alone, or as part of Creation's Own, Inc., and in some instances Dr. Rossignol acted in concert with co-defendants Dr. Usman, True Health Medical Center, and Doctor's Data, Inc.
2. Dr. Rossignol failed to make proper diagnoses of the plaintiff, A.J. Coman. Dr. Rossignol failed to make a differential diagnosis of the plaintiff, A. J. Coman, and consider alternative diagnoses.
3. Despite failing to make a proper diagnosis, Dr. Rossignol began a series of illogical, unsafe, and unwarranted "treatments". There were no stated goals for these treatments. There were no clinical end points for these treatments. There was not adequate monitoring of the progress of these treatments.
4. Dr. Rossignol used improper testing methods, including hair and provoked urine analysis, and determined that A.J. Coman had heavy metal intoxication (Mercury Poisoning/Minamata Disease). Based on the improper diagnosis of heavy metal intoxication, Dr. Rossignol exposed the child, A.J. Coman to dangerous and illicit drugs by multiple routes, for prolonged periods of time. These included chelation agents, including DMPS, Glutathione, and N-acetyl cystine. (NAC). . A.J. Coman did not have symptoms or a diagnosis

- warranting use of any of these agents.
5. Without reasonable medical justification Dr. Rossignol gave the drug spironolactone to A.J. Coman for prolonged periods of time. This drug is dangerous for children and is mutagenic.
 6. Without reasonable medical justification Dr. Rossignol arranged for A.J. Coman to receive Intravenous Immune Globulin (IVIG). This agent is an unsterilized human serum derivative and carries with it risks of a number of blood-borne diseases, including HIV infection and Jakob-Creutzfeldt Disease (and similar conditions such as Mad Cow Disease).
 7. Despite any medical justification Dr. Rossignol unnecessarily and repeatedly prescribed oxytocin, DMPS (an unapproved drug), NAC, Glutathione, and spironolactone. Dr. Rossignol did not adequately monitor the use or results of any of these agents
 8. Protracted use of chelation agents concentrate heavy metals in circulating blood and the kidneys. High concentrations of lead in the kidneys can cause kidney damage. Dr. Rossignol failed to tell or warn the parents of these risks..
 9. Despite an alleged diagnosis of heavy metal intoxication, Dr. Rossignol failed to seek competent referral for advice and treatment, and failed to report, as required, this diagnosis to the State of Illinois, Department of Health.
 10. Dr. Rossignol collaborated with other defendants regarding improper treatments and tests. Dr. Rossignol should have recognized that their tests and treatments were improper and reported them to regulatory authorities. .
 11. Dr. Rossignol's records were often inadequate and would not enable another physician to assume care and be able to understand her rationale, methods, treatments expected outcomes, and end points.
 12. Creation's Own Corporation also sold services, medications and goods to A.J. Coman through his parents. These included unlicensed and illicit drugs given to A.J. Coman.. These also included unwarranted and experimental tests.
 13. In my opinion Creation's Own Corporation was conducting human experiments on A.J. Coman through use of unapproved and unlicensed drugs.
 14. Creation's Own charged for unjustified diagnoses.
 15. Creation's own charged excessive fees of up to \$6.41 per minute for telephone "consultations" which were, in fact, improperly characterized encounter sessions with a patient who was more than 1000 miles away.
 16. There is suggestive evidence of insurance fraud and health fraud in the records reviewed.
 17. Creation's Own Corporation and Dr. Rossignol were in active collaboration with Dr. Usman and True Health Medical Center in supplying protocols for treatment. This was all carried out in the face of differing diagnoses by the various parties. The medical records do not document proper monitoring of these collaborative treatments, or record further discussions among the parties to evaluate progress.

I have further concluded, based upon my review of the medical records and other relevant materials, that a reasonable health business would, at a minimum, have

informed the plaintiff's parents of the consequences and inherent and substantial risks involved in the administration of chelation therapy treatments, and sprionolactone..

Respectfully,



February 7, 2010

To the Honorable Judge
Circuit Court of Cook County Illinois

RE: Coman v. Rossignol et al

Affidavit Regarding Doctor's Data, Inc.

I provide this written report with respect to the complaint in the Circuit Court of Cook County, Illinois filed by August James Coman (A.J. Coman), a minor, by his natural father and next friend, James Coman with respect to defendants Anjum I. Rossignol, MD, (a.k.a. Anju I. Rossignol, M.D.), True Health Medical Center of Illinois, Daniel, Rossignol, MD., Creation's Own Corporation, and Doctor's Data, Inc.

I am a physician licensed to practice medicine in the Commonwealth of Massachusetts, with an unrestricted license # [REDACTED], and am currently president and medical director of the [REDACTED] located at [REDACTED] Massachusetts [REDACTED]. I see and manage patients on a daily basis, and am also a faculty member of [REDACTED] School of Medicine in the Department of Medicine. I am the author of numerous scientific papers, including two recent papers on chelation treatments published in respected peer-reviewed journals. My bibliography includes a college textbook on Consumer Health, and I have testified before the United State Senate and the US FDA on matters of health care.

I received my A.B. degree (cum laude) in biology from [REDACTED] and earned my D.D.S. and my Ph.D. in cell biology and anatomy from [REDACTED]. Thereafter I undertook post-doctoral study in cell biology and tissue culture at [REDACTED] Medical School, and subsequently became a faculty member of that institution. After teaching and doing research for twelve years, I earned my M.D. from [REDACTED] University and completed a residency in internal medicine at an affiliated hospital. In medicine, I have 20 years of clinical experience in primary care, emergency medicine, internal medicine and occupational medicine. Over the last 25 years, I have been retained by more than 20 state licensing boards, federal agencies, insurance companies, and law enforcement agencies to offer expert opinion as to quality of care and standard of care issues in the practice of medicine.

I believe I am qualified by my experience with issues relating to standard of care, methods, procedures and treatments relevant to the allegations at issue in this case. Thus, I am, by this document, rendering my opinion that I believe the claims made in this case to hold enough merit to be reviewed by the Court. For this opinion I have reviewed the medical records and other relevant materials relating to the issues raised in the complaint in this case. I have made similar such opinions through affidavits several times in the past with other cases in various jurisdictions. My experience also includes having twice been appointed, along with a judge and a member of the bar, by the Superior Court of the Commonwealth of Massachusetts, to medical malpractice review tribunals to screen cases for merit before they can proceed. .

Based on my review of the medical records, as supplied, and other relevant materials, as well as my training, experience and expertise in the fields of internal medicine and emergency medicine, I have determined that a reasonable and meritorious cause for filing the complaint in this matter exists as it relates to the claims brought against defendant Doctor's Data, Inc.

It is the opinion of this reviewer that the doctrine of Res Ipsa Loquitur applies in that Doctor's Data, Inc. is a medical laboratory that was complicit with the other defendants in misleading the parents of A.J. Coman to believe that A.J. Coman had heavy metal intoxication. In my opinion Doctor's Data was negligent in producing grossly misleading laboratory reports. It is obvious to that its personnel had to be aware that these were regularly misused. The myriad treatments and additional tests perpetrated upon A. J Coman were a direct and proximate consequence of the test results and reports produced by Doctor's Data, Inc.

I have further concluded, based upon my review of the medical records and other relevant materials, that a reasonable health business would, at a minimum, have informed the plaintiff's parents that provoked urine test levels for heavy metals are misleading and that there is not credible clinical evidence that they actually represent heavy metal intoxication. Statements that there are "no safe level(s)" of heavy metals in the body are grossly misleading and untrue.

If the results of the tests at Doctor's Data were correct and true, Doctor's Data failed, as required, to report lab results indicating heavy metal intoxication, including lead, to the Illinois Department of Health. It is my opinion that the lack of such reporting may be taken as evidence that Doctor's Data staff were aware of the true nature of these reports as being unreliable, false, and/or misleading.

Except for organic mercury (methyl mercury) and high levels of arsenic, hair analyses have been found by the Centers for Disease Control Agency for Toxic

Sustances and Disease Registry to be unreliable for assessing patient levels of other metals and minerals. Producing test results without notice of same is, in the opinion of this reviewer, a deviation from the standard of care expected of a clinical laboratory. It is my opinion that Doctor's Data, Inc. did not meet this standard in its handling of the tests performed on A.J. Coman.

Respectfully,