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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MARCUS RUSHING,)
)
Plaintiff,)
)
v.)
)
McGaw Medical Center of Northwestern)
University;)
)
And)
)
Wood Health Company LLC;)
)
And)
)
U.S. Bank National Association;)
)
And)
)
CaseMine, Inc;)
)
And)
)
Justia, Inc;)
)
And)
)
Other Online Publishers;)
)
State of Illinois, ex rel. Office of the)
Attorney General (official capacity);)
)
And)
)
State of Ohio, ex rel. Office of the)
Attorney General (official capacity);)
)
And)
)
State of Minnesota, ex. Rel. Office of the)

Case No. 25 CV 3909

Attorney General (official capacity only, for)
venue and oversight purposes)
)
Defendants.)

**AMENDED COMPLAINT AND PETITION FOR FEDERAL REMEDY FOR
MANIFEST INJUSTICE AND DENIAL OF CONSTITUTIONAL RIGHTS (DEMAND
FOR JURY TRIAL)**

Plaintiff, Marcus Rushing, represented Pro Se, alleges as follows:

INTRODUCTION

1. Plaintiff brings this Amended Complaint seeking redress for continuing violations of his constitutional and civil rights committed through coordinated abuse of process, retaliation, fraud upon the court, and deprivation of due process by public and private actors.

The acts described herein form a continuing pattern of judicial and institutional retaliation arising from Plaintiff's protected EEOC activity against McGaw Medical Center of Northwestern University, and include collusive conduct by financial, judicial, and state actors that have unlawfully deprived Plaintiff of liberty, property, and professional livelihood.

Plaintiff now petitions this Court to intervene to remedy ongoing deprivation of rights under color of law, protect the integrity of federal jurisdiction, and restore his constitutional access to a fair tribunal and due process of law.

2. Plaintiff Marcus Rushing brings this action under the Constitution and laws of the United States, including 42 U.S.C. §§ 1981, 1983, 1985, and related statutes, as well as Minnesota statutory law.

3. This complaint seeks both declaratory and injunctive relief and monetary damages arising from constitutional violations, deprivation of statutory rights, and tortious conduct by Defendants.

4. The acts complained of include coordinated misconduct by private employers and state actors in Illinois and Ohio, resulting in ongoing injury in Minnesota, including unlawful disclosure of Safe-at-Home address information, unauthorized access to financial records, retaliatory garnishments, and reputational harm.

5. Plaintiff requests a **jury trial** on all triable issues.

I. JURISDICTION AND VENUE

6. This action arises under the Constitution and laws of the United States, including but not limited to:

- (a) the **Fifth and Fourteenth Amendments** to the United States Constitution;
- (b) **42 U.S.C. §§ 1981, 1983, and 1985(3)** (civil rights violations and conspiracy to interfere with civil rights);
- (c) the **Declaratory Judgment Act, 28 U.S.C. § 2201-2202**; and
- (d) the **All Writs Act, 28 U.S.C. § 1651(a)**.

7. A. This Court has subject-matter jurisdiction pursuant to:

- (a) **28 U.S.C. § 1331**, because this action presents substantial federal questions arising under the Constitution and federal civil rights statutes;
- (b) **28 U.S.C. § 1343(a)(3)–(4)**, because this action seeks to redress the deprivation, under color of state law, of rights, privileges, and immunities secured by the Constitution and laws of the United States;
- (c) **28 U.S.C. § 1367(a)**, which grants supplemental jurisdiction over Plaintiff's state law claims that form part of the same case or controversy under Article III of the Constitution.

B. This Court has diversity jurisdiction under 28 U.S.C. § 1332(a)(2) because:

- (a) Plaintiff is a citizen and resident of the State of Minnesota;
- (b) Defendant **CaseMine, Inc.**, is a foreign corporation organized and headquartered in India;
- (c) **Justia, Inc.**, is a corporation organized under the laws of California with its principal place of business in California; and
- (d) The amount in controversy exceeds \$75,000, exclusive of interest and costs.

8. This Court also has **authority to grant declaratory and equitable relief** under **28 U.S.C. §§ 2201–2202**, and to issue extraordinary writs as necessary to protect its jurisdiction and prevent manifest injustice pursuant to **28 U.S.C. § 1651(a)**.

9. Venue is proper in the **United States District Court for the District of Minnesota** pursuant to **28 U.S.C. § 1391(b)**, because:

- a. A substantial part of the events or omissions giving rise to the claims occurred within the State of Minnesota;
- b. Defendant U.S. Bank National Association, a Minnesota-based financial institution, maintained and closed Plaintiff's business bank account without notice, and disclosed Plaintiff's private financial and residential information to out-of-state actors in violation of Minnesota law;
- c. Plaintiff suffered injury within Minnesota, including the deprivation of financial access, exposure of a confidential Safe at Home address, reputational harm, and denial of access to impartial adjudication; and

d. Defendant State of Minnesota, ex rel. Office of the Attorney General, is included solely in its official capacity to ensure compliance, oversight, and enforcement of constitutional and statutory protections applicable to a Minnesota resident.

10. Personal jurisdiction exists over all Defendants because:

- a. Each Defendant purposefully directed acts toward the State of Minnesota and engaged in conduct causing foreseeable harm within this District;
- b. Defendant **U.S. Bank National Association** maintains its principal place of business in Minnesota and conducted the financial transactions and disclosures giving rise to the Minnesota statutory claims;
- c. Defendants McGaw Medical Center of Northwestern University and Wood Health Company, LLC, while located in Illinois and Ohio respectively, engaged in intentional torts—including interference with protected rights and communications with Minnesota-based institutions—that caused direct and substantial effects in Minnesota; and
- d. The inclusion of the official-capacity defendants from Illinois and Ohio is limited to prospective and declaratory relief to remedy constitutional violations and ensure compliance with federal law.

11. This case is properly filed in the **District of Minnesota** because Plaintiff's constitutional injuries, financial harm, and privacy violations occurred within this jurisdiction, and because ongoing enforcement and relief will be administered within Minnesota.

12. Plaintiff seeks **declaratory, injunctive, compensatory, and punitive relief, as well as equitable and supervisory remedies** necessary to prevent the continued deprivation of constitutional rights and to redress the manifest injustice described herein.

II. PARTIES TO THIS COMPLAINT

13. **Plaintiff, Marcus Rushing**, is a United States citizen of African descent and resident of the State of Minnesota. Plaintiff is a registered participant in Minnesota's Safe-at-Home address-confidentiality program (Minn. Stat § 5B.01 et seq.), maintains business and banking relationships headquartered in Minnesota, and has suffered constitutional, reputational, and economic injury within this District.

14. **Defendant McGaw Medical Center of Northwestern University** is an Illinois corporation engaged in healthcare services and employer of Plaintiff during relevant times with an address of 420 E. Superior St, STE 9-900, Chicago, IL 60611.

15. **Defendant Wood Health, LLC** is a corporation with an address of 950 W Wooster St, Bowling Green, OH 43402 (hereinafter “Wood Hospital”).

16. **Defendant U.S. Bank National Association**, is a national banking association headquartered at 800 Nicollet Mall, Minneapolis, Minnesota.

17. **CaseMine, Inc** (“CaseMine”) is a corporation organized and existing under the laws of India, with a registered office at 450B, Sector-38, Near Medanta Hospital, Gurugram, Haryana 122001, India (Company Identification Number (CIN): U51909HR2021PTC099107. CaseMine operates a global online legal research platform that republishes court filings and legal memoranda, including filings related to Plaintiff’s prior federal and state civil actions. CaseMine maintains editorial discretion over the content it republishes, including the titles, summaries, and keywords that appear in search results, and has distributed and optimized misleading and materially inaccurate representations of Plaintiff’s legal matters.

18. **Justia, Inc.** (“Justia”) is a corporation organized and existing under the laws of California, with principal offices located at 100 Crescent Court, Suite 700, Dallas, TX 75201. Justia maintains an online legal database that republishes judicial filings, case summaries, and court dockets. Justia’s platform has published and optimized materials related to Plaintiff’s civil actions, including inaccurate labeling of dismissals as “final judgments,” resulting in reputational and economic harm to Plaintiff.

19. **Other Online Publishers** (“Third-Party Legal Platforms”) include, but are not limited to, Casetext, and affiliated archival services, which have republished, summarized, or distributed Plaintiff’s legal filings in a misleading manner. These platforms have amplified the effect of the

false and defamatory content by allowing it to persist online and by optimizing it for search engines, including Google, under Plaintiff's personal and business name.

20. Defendant State of Illinois, ex rel. Office of the Attorney General, State of Ohio, ex rel. Office of the Attorney General, and State of Minnesota, ex rel. Office of the Attorney General are included in official capacities only for declaratory and prospective oversight relief.

III. STATEMENT OF FACTS

21. Plaintiff is a Minnesota resident and Safe-at-Home participant.

22. Plaintiff was employed by Defendant McGaw Medical Center (Illinois) and later by Wood Health Company, LLC (Ohio).

23. Plaintiff filed EEOC claims against prior employers for discrimination, retaliation, and breach of settlement agreements.

24. An Illinois divorce proceeding (Case 2019D8356, Circuit Court of Cook County, Illinois) commenced while Plaintiff resided in Minnesota.

25. Defendant McGaw engaged in conduct that interfered with the Illinois tribunal to influence proceedings.

(a) Defendant McGaw, who was not a party to the Illinois tribunal at that point in time, requested that an attorney who was not a party to the case, request that the Plaintiff quash a subpoena to McGaw.

(b) The Plaintiff formally denied the Motion to Quash the subpoena to McGaw which the Plaintiff did not issue.

(c) Following this denial, Defendant McGaw contacted opposing counsel in the tribunal, requesting that counsel produce only a limited response to the subpoena

(d) Defendant McGaw's actions appeared to conceal items that disparaged Plaintiff professionally, when Plaintiff was not aware of those items inclusion in the settlement agreement.

(e) Shortly after Plaintiff denied the Motion to Quash, opposing counsel and the presiding Illinois judicial officer issued a garnishment order against the Plaintiff, based on an order previously adjudicated by a different judge in the same proceeding, when at that point in

time the Plaintiff was paying child support timely and in full, including prepayment of a future support obligation that had not yet been credited.

(f) The aforementioned events resulted in Plaintiff's financial and professional harm, and demonstrate coordination between Defendant Employer and other actors in the tribunal that directly affected the adjudication and enforcement of orders in which Plaintiff had a vested interest.

26. During the Illinois divorce proceeding, which lasted from Oct of 2019 until the present, the following occurred to deprive Plaintiff of parenting time:

(a) Despite repeated requests, Plaintiff was allowed fewer than 20 days of parenting time during this period.

(b) A final allocation judgement in May of 2023 did not provide for any parenting time

(c) No legal justification was provided for restricting Plaintiff's parenting time.

(d) The reduction was not based on any findings of neglect, abuse, or unfitness.

(e) Attorneys for the parties and the Guardian ad Litem, who was an alumnus of Northwestern University, refused to facilitate reasonable access to the children.

(f) As a result, Plaintiff was prevented from exercising his constitutionally protected right to parent his children, and the minor children experienced significant emotional distress, [REDACTED] and statements that they wished to spend time with the Plaintiff.

(g) the ongoing denial of parenting time interfered with Plaintiff's ability to maintain a meaningful parental relationship and caused demonstrable harm to the children's emotional well-being.

27. The Plaintiff then engaged in federally protected activity against the employer by filing an EEOC complaint.

28. Even after being notified of Plaintiff's federally protected activity, the Illinois judge allowed Defendant McGaw to file documents into the divorce proceeding.

29. Ex parte communications, shifting court dates, and denial of modification to child support orders prevented Plaintiff from challenging the garnishments.

30. The Illinois judicial officer issued an order of protection enabling Defendant McGaw to evade lawful subpoenas and conceal exhibits disparaging Plaintiff professionally.

31. While employed by Defendant Wood Health Company, Plaintiff's Human Resources department informed him that they had communicated with the Illinois judicial officer as well as counsel for the former employer Defendant McGaw.
32. The Illinois judicial officer authorizes garnishments from Defendant Wood Health Co. pursuant to the Child Support Order in paragraph 10 above.
33. The Illinois judicial officer also authorizes garnishment from Defendant Wood Health Co. on behalf of the attorney (Henderson Banks) that Defendant McGaw reached out to get the Plaintiff to Quash the Subpoena to McGaw.
34. Service of process was misdirected to Defendant Wood Health Co, resulting in a Default Judgment in the divorce proceeding.
35. Plaintiff lost his home, custody of his children, and faced financial obligations beyond his ability to pay.
36. Approximately 1 week after the Default judgement was entered against the Plaintiff, the Plaintiff was then terminated by Wood Health Co.
37. Another Illinois attorney, Darrel Dunham, representing Plaintiff in the divorce proceeding engaged in ex parte communication with the Illinois judge and Defendant McGaw, disclosing privileged information including private and health information.
38. Upon information and belief of the Plaintiff, the Illinois judge while aware of the ongoing EEOC claim, its associated right to sue with an upcoming expiry, then issues a body attachment order against the Plaintiff.
39. The aforementioned served to obstruct the Plaintiff's access to justice.
40. Motions to vacate or modify orders were delayed or denied.
41. Plaintiff retained several counsel to litigate against prior employers; though retained through contingency agreements to litigate, all refused, creating the appearance of strategic interference by Defendants.
42. In or about April of 2024, Plaintiff filed two separate state proceedings: one in the **Circuit Court of Cook County, Illinois** (filed on 4/24/24), and another in the **Court of Common Pleas, Lucas County, Ohio** (filed on 4/29/25).
43. Plaintiff then filed a Federal Question complaint on around May 10, 2025 seeking equitable consolidation of two Title 7 claims.
44. Plaintiff would later amend the Illinois state complaint (9/11/2024) to add Defendants and claims for fraudulent inducement, misrepresentation and concealment, conspiracy against civil rights, breach of contract, tortious interference, and defamation per se.

45. The Federal Question complaint was dismissed for failure to state a claim.
46. Although Plaintiff timely submitted pleadings and motions, including a motion to strike an improper sur-reply brief filed by the Illinois defendant-employer without leave of court, **no hearing was held and no substantive rulings were issued.**
47. The Plaintiff never received service of notice of the dismissal but only learned of the details of the dismissal when a Google search of the Plaintiff' s yielded a published legal document regarding the ruling (see paragraph 36).
48. Believing that procedural irregularities and continuing violations warranted renewed review, Plaintiff filed his claim in the **U.S. District Court for the District of Minnesota (Eighth Circuit).**
49. The Plaintiff filed a Federal Claim in the 8th Circuit against Defendant McGaw, Wood County Hospital, Unity Point Health, and HealthPartners for additional claims including blacklisting, false designation of origin, abuse of process, and breach of contract.
50. Following the filing of the Federal Claim, the presiding state judges began to issue sua sponte orders reversing amended complaints, without knowledge of the plaintiff.
51. These orders appeared to rely on the prior Federal Question claim, potentially creating an appearance that res judicata from earlier federal proceedings applied, even though the federal case was still pending in the Eighth Circuit.
52. During this same time period, a publication of the un-amended original complaint appeared on the first page of a Google Search of the Plaintiff' s name.
53. The legal document was published even though there was an active amended complaint on file.
54. Additionally, a Google Search of the Plaintiff' s name also showed a published version of a Memo from the Federal Complaint, which the Plaintiff had not yet been formally notified of that suggested that the Plaintiff' s previous Federal Question was a final judgement, despite the federal case not having been dismissed with prejudice and while remaining adjudication was pending in the Eighth Circuit.
55. During this same time, the Defendants or their agents **publicly disseminated and optimized online postings** of the prior federal case docket through internet search engines, **falsely implying that a final adjudication on the merits had been entered** against the Plaintiff.
56. These postings, which referenced the prior **Sixth Circuit federal complaint**, were manipulated to appear in public search results associated with Plaintiff' s name, creating a **false light and defamatory impression** of adjudicated wrongdoing.

57. Then, the Ohio and State Judicial officers presiding over the state tribunals against Defendants McGaw and Wood County Hospital began to engage in conduct suggestive of ex parte communication, including reversing and/or denying amended complaints apparently sua sponte, despite no proper service notifying the Plaintiff.

58. These Orders appeared to rely on a prior federal proceeding that had non-identical defendants as the two state proceedings and when there was a remaining pending adjudication in the Eighth Circuit.

59. These actions by the state judges had the effect of disenfranchising Plaintiff's rights by misrepresenting the status of federal and state proceedings, interfering with Plaintiff's ability to pursue claims, and creating public records that could impact Plaintiff's professional and personal reputation.

60. Almost simultaneously, the **Illinois** and **Ohio** state tribunals lifted previously entered stays and proceeded to issue adverse rulings against Plaintiff, including threatened dismissal *with prejudice*, while Plaintiff's federal case remained pending or unresolved.

61. Upon filing in the 8th Circuit, **none of the defendants returned the waiver of service of summons**, and Plaintiff continued to experience retaliatory actions by one or more defendants, including blacklisting, interference with business relations, and misuse of ongoing state proceedings.

62. Despite the filing of motions for injunctive relief and judicial review, the Minnesota federal action was dismissed without prejudice prior to any hearing or consideration of Plaintiff's motions.

63. At the same time, the Illinois state court proceeding posted an earlier, superseded version of Plaintiff's complaint through similar means, while **concealing that an amended complaint had already been approved by the court**.

64. Subsequent to ex parte communications between the Illinois state judge and counsel for the Illinois defendant, the judge **sua sponte reversed** his prior order allowing the amended complaint, thereby creating the appearance that the outdated online filing was the operative pleading.

65. The aforementioned conduct prompted the Plaintiff to file a Motion to Disqualify the Ohio Judge with the Ohio Supreme Court as well as a Writ of Prohibition to halt the Ohio state court proceeding. The Writ of Prohibition remains pending.

66. These events prompted Plaintiff to file a **Petition for Supervisory Order** in the **Supreme Court of Illinois** seeking the substitution of judge for cause and review of fraudulent proceedings. That petition remains pending.

A. FACTUAL PATTERN OF PRACTICE: SYSTEMIC PROCEDURAL MANIPULATION AND MANIFEST INJUSTICE.

64. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

65. The present action arises from a continuous and coordinated pattern of judicial misconduct, procedural manipulation, and retaliatory deprivation of rights occurring across multiple state tribunals—specifically, the Illinois and Ohio state courts—during the pendency of Plaintiff’s related federal actions in the U.S. District Court for the District of Minnesota.

66. Collectively, the acts described below demonstrate a recurring misuse of judicial discretion, ex parte decision-making, and procedural irregularities designed to deprive Plaintiff of his fundamental constitutional rights to notice, to be heard, and to an impartial tribunal, as guaranteed by the **Fourteenth Amendment to the U.S. Constitution**.

Ohio Proceedings – Ex Parte Amendments and Concealment of Record

67. On or about **June 10, 2025**, the presiding judge in the Lucas County Court of Common Pleas entered an **Order Granting Defendant Leave to Amend its Answer** without prior service, motion, or notice to Plaintiff. The amendment inserted a new **res judicata** defense absent from the original pleading. Plaintiff was thereby deprived of the opportunity to object or respond, as documented in **Plaintiff’s Judicial Notice and Motion to Vacate** (Exhibits 1–2).

68. Plaintiff’s subsequent **Motion to Vacate Order Entered Without Notice** (filed October 12, 2025) under **Ohio Civ.R. 60(B)(1) and (3)** detailed that no motion, proposed order, or certificate of service appeared on the docket prior to the entry of said order. Nevertheless, the court failed to remedy or vacate the unlawful ex parte action, ratifying the violation and further depriving Plaintiff of due process.

69. The order’s ex parte issuance enabled Defendant to file a Motion for Judgment on the Pleadings based on the newly-added **res judicata** defense, thereby converting an otherwise procedurally defective motion into a plausible one.

70. On or about **August 25–27, 2025**, two praecipes appeared on the docket bearing inconsistent handwritten and typed dates and directing service of judgment “within 3 days of journalization.” These entries corresponded to multiple orders allegedly served to Plaintiff’s **previous address**, despite Plaintiff’s **Change of Address** filing being accepted by the court days earlier.

71. Plaintiff filed successive **Motions to Address Failure of Service** and **Motions to Compel Proof of Service** under **Ohio Civ.R. 5(B)** (September 15 and 17, 2025), requesting evidence of proper service of critical filings. Both motions were **sua sponte stricken** from the docket without hearing or explanation on September 23, 2025—while a related **Affidavit of Disqualification** and **Writ of Prohibition** were pending before the Ohio Supreme Court.

72. The striking of these motions obstructed appellate review by erasing objections from the record, in direct violation of **Ohio App.R. 9(A)–(E)** and clearly established federal due process principles.

73. Plaintiff then filed a **Notice of Preservation of Objection to Stricken Filings and Judicial Notice of Defective Service and Irregular Docket Entries** (pursuant to **Ohio Evid.R. 201**) to preserve the irregularities for appeal. Despite these filings, the docket continued to show “Email/Mail Notify Filed” entries without any certificate of service or recipient listing—demonstrating continued concealment and non-service.

74. The cumulative conduct of the Ohio tribunal and opposing counsel demonstrates a deliberate pattern of obstruction intended to (a) prevent creation of a complete record, (b) conceal defective service, and (c) fabricate procedural compliance to support dismissal on pretextual grounds.

Illinois Proceedings – Unauthorized Alteration of Pleadings and Jury Deprivation

75. In the parallel Illinois state action, Plaintiff’s **Amended Complaint**, which had been approved and included a jury demand, was later **sua sponte modified by the presiding judge** after the federal complaint was dismissed without prejudice.

76. The modification reversed or altered the caption and party alignment, **substituted identical defendants** between the Illinois and federal actions, **eliminated two defendants**, and **removed the jury trial designation**—all without service, notice, or motion.

77. Plaintiff discovered the alterations only through independent review of the online docket. No motion, order, or minute entry reflected the modification.

78. Upon discovery, Plaintiff promptly filed in federal court a **Motion for Injunctive Relief, Notice of Federal Interference**, and **Petition for Supervisory Order Against the Judicial Officer**, all of which remain pending.

79. The Illinois judge’s *sua sponte* alteration of Plaintiff’s pleadings—after the dismissal of a related federal action and without notice—constitutes procedural interference, intended to merge or confuse jurisdictional boundaries and to fabricate parity between the federal and state cases, thereby undermining federal diversity and jurisdictional claims.

C. Coordinated Retaliatory Acts and Procedural Harassment

80. Concurrently, Plaintiff was engaged in litigation against **U.S. Bank**, a named defendant in both the Minnesota federal complaint and the state proceedings. During the pendency of both cases, U.S. Bank unlawfully disclosed Plaintiff’s confidential **Safe-at-Home address**, closed Plaintiff’s business account, and transferred funds belonging to Plaintiff to an unauthorized third party in another state.

81. Plaintiff filed an **Emergency Motion for Order of Protection and Emergency Hearing** to safeguard personal and financial security. Instead of granting protection, the state court denied relief and issued an **Order to Show Cause** against Plaintiff—reversing the victim and violator roles.

82. Plaintiff responded fully, with documentation of U.S. Bank's violations. Despite this, the court issued contradictory scheduling orders, accepted Plaintiff's **IFP** application, and then ceased all further correspondence with Plaintiff.

83. The Plaintiff was informed after his change of address was filed on Aug 27, 2025, that his case was dismissed without motion or hearing and without notice, followed by a **backdated order** (dated October 1, 2025, received October 10, 2025) purporting to dismiss certain counts "with prejudice."

84. The backdated order coincided with Plaintiff's filing of federal exhibits implicating U.S. Bank, evidencing intent to **preempt or obstruct** federal jurisdiction and review.

85. Upon information and belief of Plaintiff, the order lacked a certificate of service,

D. Pattern and Constitutional Implications

86. Taken together, these facts establish a **pattern of coordinated procedural manipulation and constructive judicial bias** spanning multiple jurisdictions.

87. The actions of the Illinois and Ohio courts, in concert with opposing counsel, collectively:
(a) deprived Plaintiff of notice and opportunity to be heard;
(b) facilitated ex parte orders and altered pleadings to benefit defendants;
(c) erased or suppressed motions challenging misconduct; and
(d) obstructed appellate and federal review.

88. These acts constitute violations of Plaintiff's constitutional rights under:
(a) **Fourteenth Amendment (Due Process and Equal Protection)**;
(b) **First Amendment (Right of Access to Courts)**; and
(c) **Article III, Section 2 (Guarantee of Federal Jurisdiction and Judicial Independence)**.

89. The recurring procedural deviations—denials of service, backdated orders, and unilateral docket alterations—evidence not isolated error but systemic bias, designed to retaliate against Plaintiff for pursuing federal civil rights claims and to shield state judicial actors and institutional defendants from accountability.

90. The totality of these actions represents **manifest injustice** under federal equitable principles, necessitating this Court's intervention under **28 U.S.C. §§ 1331, 1343, 1367**, and the Court's inherent power to protect the integrity of judicial process and the constitutional guarantees of fairness, neutrality, and access to justice.

91. As a direct and proximate result of the foregoing acts and omissions, Defendants—acting individually and in concert, and under color of state law—have caused Plaintiff to suffer ongoing injury, including deprivation of due process and equal protection rights, denial of meaningful access to the courts, loss of property and reputation, emotional and financial harm, and continued

obstruction of federal judicial review. The cumulative pattern of misconduct described herein constitutes a **manifest injustice** that this Court has both the jurisdiction and the duty to remedy.

92. Accordingly, Plaintiff brings the following causes of action under the Constitution and laws of the United States, including but not limited to 42 U.S.C. §§ 1983, 1985(2)-(3), and 1986, and the Court's inherent equitable authority, seeking declaratory, injunctive, and compensatory relief, as well as a trial by jury on all issues so triable.

IV. CAUSES OF ACTION

Count I – Fraudulent Service, Electronic Interference, and Deprivation of Access to Courts (42 U.S.C. §§ 1983, 1985(2), 1985(3), and 1986; First and Fourteenth Amendments)

(Defendants U.S. Bank, McGaw Medical Center of Northwestern University, Wood Health Company, LLC US Bank and Associated State Actors; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes); and all other persons acting in concert with them, whether named or unnamed.

93. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

94. Beginning immediately after Plaintiff initiated federal proceedings asserting violations of constitutional and civil rights, Defendants—individually and in concert—knowingly directed service of filings, notices, and orders to an email address previously compromised (“the hacked account”) that Plaintiff had expressly informed the Illinois tribunal and all parties was **no longer secure and unauthorized for service**.

95. Despite explicit written notice from Plaintiff identifying that the account had been hacked and that all future service must be directed to a verified and substituted address, Defendants and/or their agents, representatives, or apparent agents continued to use the compromised account as the purported service address.

96. Upon information and belief, certain Defendants, their servants, agents, or apparent agents were directly or indirectly involved in the hacking, unauthorized access, or continued use of the compromised email account for the purpose of intercepting or withholding communications and court filings, thereby obstructing Plaintiff's participation in active litigation.

97. The knowing direction of court service and legal correspondence to a compromised account—without consent, authorization, or verification—constitutes **fraudulent service** under color of state law, violating:

- a. Plaintiff's First Amendment right of access to the courts;
- b. Plaintiff's Fourteenth Amendment right to due process and notice; and
- c. Federal and state privacy protections safeguarding confidential and personally identifiable information.

98. As a direct and proximate result of Defendants' acts and omissions, Plaintiff was deprived of timely notice of filings and orders, prevented from responding to dispositive motions, and placed at material procedural disadvantage in multiple concurrent state and federal proceedings.

99. Defendants' conduct demonstrates deliberate indifference and reckless disregard for Plaintiff's constitutional rights and evidences a coordinated pattern of obstruction designed to frustrate judicial process, distort procedural records, and impair Plaintiff's ability to litigate and appeal effectively.

100. This coordinated misuse of electronic service constitutes **a conspiracy under 42 U.S.C. § 1985(2) and (3)** to hinder, obstruct, and retaliate against Plaintiff for exercising rights secured by the Constitution and federal law, and the failure of certain Defendants to prevent or report such conduct constitutes a violation of **42 U.S.C. § 1986**.

101. Plaintiff has suffered actual injury, including but not limited to loss of procedural rights, deprivation of fair notice, increased litigation expense, emotional distress, reputational harm, and impairment of access to judicial relief.

102. Plaintiff seeks declaratory, injunctive, compensatory, and punitive damages, as well as equitable relief requiring:

- a. Verification and protection of Plaintiff's designated service address across all proceedings;
- b. Prohibition of further use or dissemination of the compromised email account; and
- c. Referral of the conduct to appropriate investigative and disciplinary authorities for review of potential electronic interference and misconduct.

Count II — Retaliation, Abuse of Process, and Continuing Violation Arising from Protected EEOC Activity and Racial Discrimination (42 U.S.C. §§ 1983)
(Defendants McGaw Medical Center of Northwestern University, Wood Health Company, LLC US Bank and Associated State Actors; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes); and all other persons acting in concert with them, whether named or unnamed.

A. Background and Protected Activity

103. On **January 10, 2023**, Plaintiff, a Black physician and former employee of **McGaw Medical Center of Northwestern University** ("McGaw"), filed a **charge of discrimination with the Equal Employment Opportunity Commission (EEOC)**, alleging racial discrimination, retaliation, and constructive discharge.

104. Plaintiff's EEOC charge arose after he was subjected to **racially charged and coercive statements** in his performance evaluation, including the following:

"I know that a big part of your character is seeking truth, and it may feel disingenuous to endorse anything that you disagree with. But it will bite you in the ass if you don't learn to concede sometimes to the group, even if they are wrong. You can be completely right, and it won't matter if people have already turned against you. It is a dangerous world for a Black man, and you can't afford to make it more dangerous for yourself by being unable to let things go."

105. Plaintiff's refusal to accept racially discriminatory workplace norms and his act of filing an EEOC complaint constitute **protected activity** under Title VII and **42 U.S.C. § 1981**.

B. Chain of Retaliatory and Collusive Conduct

106. After McGaw was found **non-compliant with a valid subpoena** in the Illinois divorce proceedings, counsel associated with McGaw attempted to contact Plaintiff directly—though not a party to that case—to persuade him to **quash a subpoena he did not issue**.

107. When Plaintiff declined to do so, the **presiding Illinois state judge**—an alumnus of Northwestern University—**issued a new child support order** that contradicted prior adjudications, despite Plaintiff being current on his obligations and having paid in advance.

108. Upon Plaintiff's **request for the judge's recusal** based on a clear conflict of interest, the judge refused and instead entered an **order of protection in favor of McGaw**, effectively shielding it from subpoena compliance.

109. Plaintiff later discovered that McGaw and its counsel had **fraudulently concealed a settlement exhibit** executed under duress and coercion, which contained material evidence relevant to Plaintiff's pending EEOC and federal claims.

110. When Plaintiff filed a **judicial misconduct complaint** against the presiding Illinois judge with the Illinois Supreme Court, the judge retaliated by:

- a. **Altering court dates** so that Plaintiff could not attend key hearings in his divorce and its consolidated foreclosure;
- b. **Rejecting motions for relief** from the child support order; and
- c. **Communicating ex parte** with Plaintiff's employer in Ohio and subsequently causing sensitive filings to be served to Plaintiff's workplace rather than his service address.

111. The same judicial officer engaged in **ex parte communication with Plaintiff's attorneys**, disclosing **privileged medical and personal information**, and later entered a **default judgment** in both the divorce and foreclosure actions, imposing impossible financial obligations.

112. **Seven days after the default judgment**, Plaintiff was **terminated from his employment in Ohio**—the same employer with whom the judge had direct or indirect communications.

C. Continuing Retaliation and Collusion

113. While Plaintiff was unemployed and awaiting his **EEOC Right-to-Sue Notice**, the same judge issued a **body attachment order**—still in effect to this day—without lawful basis or notice.

114. Plaintiff's **motions to vacate** and **motions for substitution of judge for cause** were denied.

115. After learning he was **named as a party or witness** in Plaintiff's federal civil rights action, the same judge **dismissed the state case** and awarded **attorney's fees to attorneys who were also witnesses or participants** in the misconduct alleged herein.

116. Plaintiff's **motion to reinstate** the state case was delayed to **December 2025**, effectively denying prompt judicial review.

117. In the interim, the **child support order**—procured through fraud and retaliation—was **disseminated to multiple medical boards** and the **National Practitioner Data Bank**, resulting in suspension or cancellation of Plaintiff's medical licenses and permanent reputational harm.

118. That same order was used to **garnish over 50% of Plaintiff's disability pay** while he worked in Iowa, and later to **garnish 100% of his personal bank account**, information allegedly obtained through **US Bank's unlawful disclosure** of his account without subpoena, order, or warrant.

D. Causes of Action

119. Defendants' actions constitute **retaliation for engaging in protected activity** under **Title VII**, and racial discrimination and interference with contractual relations under **42 U.S.C. § 1981**.

120. The actions of judicial officers, acting under color of state law, constitute **violations of Plaintiff's rights to due process and equal protection** under **42 U.S.C. § 1983**.

121. The concerted acts between the Illinois state judge, McGaw, and other state or private actors to suppress Plaintiff's rights and manipulate judicial proceedings amount to a **conspiracy to deprive civil rights** under **42 U.S.C. § 1985(2) and (3)**.

122. The cumulative effect of the above conduct represents a **continuing violation** that began with Plaintiff's protected EEOC filing and has persisted through ongoing state and federal proceedings designed to deprive him of property, liberty, and livelihood.

E. Damages and Relief Requested

123. Plaintiff incorporates by reference the general **Prayer for Relief** and seeks, specifically under this Count:

1. **Declaratory judgment** that Defendants' conduct violated Plaintiff's federal civil rights under 42 U.S.C. §§ 1981, 1983, and 1985, and Title VII of the Civil Rights Act.
2. **Permanent injunctive relief** prohibiting further enforcement of any child support, protective, or body attachment orders procured through retaliatory or fraudulent means.
3. **Reinstatement of Plaintiff's medical credentials and licenses** wrongfully impaired by Defendants' retaliatory dissemination of false information.
4. **Compensatory and punitive damages** for lost income, emotional distress, reputational damage, and deprivation of due process.
5. **Referral to federal oversight or judicial discipline authorities** for review of state judicial misconduct and collusion with private parties.

F. Relief Requested Under Count II

124. Plaintiff incorporates by reference all preceding paragraphs and the general **Prayer for Relief**, and specifically requests that this Court:

1. **Declare** that Defendants' acts constituted unlawful retaliation, abuse of process, and racial discrimination under federal law;
2. **Vacate** any state orders, judgments, or enforcement actions obtained through retaliatory or collusive means;
3. **Issue injunctive relief** prohibiting continued enforcement or dissemination of said orders to any licensing or credentialing authorities;
4. **Order reinstatement or restoration** of Plaintiff's professional licenses and credentials wrongfully impaired by Defendants' misconduct;
5. **Award compensatory and punitive damages**, including lost income, emotional distress, reputational injury, and costs of litigation;
6. **Refer the matter** to federal oversight bodies or judicial conduct commissions for investigation of misconduct, collusion, and abuse of process by judicial officers and private actors.

Count III — Violation of Civil Rights (42 U.S.C. § 1983 – Equal Protection)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and U.S. Bank)

125. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

126. This Count is brought under 42 U.S.C. § 1983, which provides a cause of action against any person who, under color of state law, deprives another of rights, privileges, or immunities secured by the Constitution and laws of the United States.

127. The Equal Protection Clause of the Fourteenth Amendment prohibits the States and those acting under color of state law from intentionally treating similarly situated individuals differently based on impermissible or arbitrary classifications, and from retaliating against individuals for engaging in constitutionally protected activity.

128. Retaliation for exercising protected rights under the Constitution—such as opposing discrimination, petitioning the courts for redress, or asserting privacy and due process protections—constitutes an independent violation of the Equal Protection and Due Process Clauses. *See Mt. Healthy City Sch. Dist. Bd. of Educ. v. Doyle*, 429 U.S. 274 (1977); *Village of Willowbrook v. Olech*, 528 U.S. 562 (2000).

B. Factual Allegations Supporting the Violation

129. Plaintiff engaged in constitutionally protected conduct, including:

- a. Filing and participating in legal proceedings to vindicate his federal civil rights;
- b. Opposing unlawful discrimination and retaliatory actions by his employers; and
- c. Asserting privacy protections under Minnesota's Safe-at-Home program and related statutory safeguards.

130. Following these protected activities, Defendants—acting in concert with one another and under color of state law—engaged in retaliatory and discriminatory conduct directed toward Plaintiff, including:

- a. Facilitating or participating in improper ex parte communications between private employers and state officials;
- b. Disclosing confidential and protected information about Plaintiff's identity and residence;
- c. Inducing or allowing retaliatory employment and financial actions against Plaintiff;
- d. Depriving Plaintiff of fair and impartial proceedings in Illinois and Ohio tribunals; and
- e. Failing to intervene or correct known constitutional violations once they were brought to the attention of state agencies and attorneys general.

131. Defendants' actions were taken with discriminatory purpose and retaliatory intent, and lacked any rational basis or legitimate state interest.

Similarly situated individuals who had not engaged in protected conduct or challenged state or employer actions were not subjected to comparable treatment, deprivation, or retaliation.

132. The discriminatory and retaliatory conduct directly caused Plaintiff to suffer loss of professional opportunities, reputational harm, closure of financial accounts, and deprivation of access to lawful state and federal remedies.

133. The cumulative effect of these acts constitutes a pattern of unconstitutional retaliation and unequal treatment under the Fourteenth Amendment.

C. Acting Under Color of Law

134. The State Defendants acted under color of state law through their official offices and agents. Private Defendants acted jointly with, and under the direction or influence of, state officials in Illinois and Ohio, thereby satisfying the “state action” requirement of § 1983 under the joint participation and symbiotic relationship doctrines. *See Dennis v. Sparks*, 449 U.S. 24 (1980); *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).

D. Nature of the Deprivation

135. Plaintiff was deprived of the equal protection of the laws and the right to be free from retaliation for engaging in protected conduct.

136. Defendants’ actions were intentional, malicious, and undertaken with reckless disregard for Plaintiff’s constitutional rights.

137. The ongoing enforcement and collateral use of void or retaliatory actions continue to perpetuate unequal treatment and constitutional injury.

E. Damages and Relief

138. As a direct and proximate result of Defendants’ conduct, Plaintiff has suffered:

- a. Loss of employment and business opportunities;
- b. Financial and reputational injury;
- c. Emotional distress and humiliation;
- d. Deprivation of liberty and property without equal protection of law; and
- e. Continuing harm from retaliatory acts and denial of redress.

139. Plaintiff is entitled to declaratory, injunctive, compensatory, and punitive relief under 42 U.S.C. §§ 1983 and 1988.

140. WHEREFORE, Plaintiff respectfully requests that this Court:

- (a) Declare that Defendants’ conduct violated Plaintiff’s rights to equal protection and freedom from retaliation;
- (b) Enjoin Defendants from further discriminatory or retaliatory acts;
- (c) Award Plaintiff compensatory and punitive damages in an amount to be determined at trial;
- (d) Grant reasonable costs and attorney’s fees pursuant to 42 U.S.C. § 1988; and
- (e) Award such other and further relief as this Court deems just and proper.

Count IV — Violation of Civil Rights (42 U.S.C. § 1983 – Due Process)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes); and U.S. Bank National Association)

66. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

67. This claim is brought under 42 U.S.C. § 1983, which provides a remedy against any person who, under color of state law, deprives a citizen of the United States of any rights, privileges, or immunities secured by the Constitution and laws of the United States.

68. The Fourteenth Amendment to the United States Constitution guarantees that no State shall “deprive any person of life, liberty, or property, without due process of law.”

69. Both procedural due process (fair procedures before deprivation of protected rights) and substantive due process (freedom from arbitrary or abusive state action) are protected under the Fourteenth Amendment.

70. The actions and omissions of Defendants constitute violations of Plaintiff’s procedural and substantive due process rights within the meaning of § 1983.

B. Factual Allegations Supporting the Violation

71. Plaintiff was deprived of protected property and liberty interests—including his business bank account, professional reputation, and access to an impartial judicial forum—through actions undertaken jointly and in concert by state officials and private entities acting under color of law.

72. Defendants McGaw Medical Center of Northwestern University and Wood Health Company, LLC, in coordination with state actors, engaged in retaliatory conduct and made false and stigmatizing statements that damaged Plaintiff’s professional and personal standing without affording any opportunity for notice or hearing.

73. Defendant U.S. Bank National Association unlawfully disclosed Plaintiff’s confidential financial information and closed his business bank account without prior notice, judicial

authorization, or any opportunity for Plaintiff to contest the deprivation, in violation of Plaintiff's statutory and constitutional rights.

74. The disclosure and account closure were undertaken after communication between the bank and state entities in Illinois, which sought or obtained Plaintiff's personal and financial data outside any lawful subpoena, warrant, or administrative process.

75. State Defendants (Illinois, Ohio, and Minnesota, ex rel. Attorneys General) knew or should have known that such actions constituted unconstitutional interference with protected property and privacy rights, yet failed to intervene or to provide adequate process to correct the violations once they were discovered.

76. Defendants, acting jointly and with mutual understanding, caused or permitted the enforcement of void, fraudulent, or retaliatory state orders and administrative actions, depriving Plaintiff of his right to fair procedure, impartial adjudication, and equal access to the courts.

77. The combined effect of these acts resulted in the deprivation of Plaintiff's liberty to pursue his occupation, maintain his reputation, and access lawful banking services—interests that are protected by the Constitution and recognized as fundamental under *Board of Regents v. Roth*, 408 U.S. 564 (1972), and *Mathews v. Eldridge*, 424 U.S. 319 (1976).

C. Acting Under Color of Law

78. Defendants Illinois, Ohio, and Minnesota, through their respective Attorneys General, acted under color of state law.

79. Private Defendants McGaw Medical Center, Wood Health Company, and U.S. Bank National Association acted under color of state law by (a) cooperating with, assisting, or executing joint objectives with state actors, (b) receiving direct or indirect direction from government officials, and (c) performing traditionally governmental functions, such as enforcement of orders and disclosure of protected records.

80. The conduct of all Defendants was therefore taken “under color of state law” within the meaning of 42 U.S.C. § 1983.

E. Nature of the Deprivation

81. Plaintiff was denied both procedural due process, because he received no notice or opportunity to be heard prior to the deprivation of property, liberty, and statutory privacy rights; and substantive due process, because the deprivations were arbitrary, capricious, retaliatory, and without lawful justification.

82. The Defendants' acts were intentional, malicious, and reckless, undertaken with deliberate indifference to Plaintiff's constitutional rights.

F. Damages and Relief

83. As a direct and proximate result of Defendants' unconstitutional acts and omissions, Plaintiff suffered:

- a. Loss of business and professional income;
- b. Reputational injury and stigma;
- c. Emotional distress and humiliation;
- d. Denial of access to financial services and state judicial remedies;
- e. Loss of liberty and opportunity to pursue his occupation; and
- f. Ongoing harm from reliance on void and fraudulent orders.

84. Plaintiff is entitled to declaratory and injunctive relief as set forth in the Prayer for Relief, as well as compensatory and punitive damages pursuant to 42 U.S.C. §§ 1983 and 1988.

85. WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against all Defendants jointly and severally, awarding:

- (a) Declaratory judgment recognizing the violations described;
- (b) Prospective injunctive relief to prevent further constitutional deprivations;
- (c) Compensatory and punitive damages in an amount to be determined at trial;
- (d) Costs and attorney's fees pursuant to 42 U.S.C. § 1988; and
- (e) Any other relief this Court deems just and proper.

Count V — Deprivation of Access to Impartial Tribunal (42 U.S.C. § 1983)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes))

101. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

102. This Count arises under 42 U.S.C. § 1983, which provides a remedy to individuals deprived of constitutional rights by persons acting under color of state law.

103. The First Amendment guarantees every person the right to petition the government for redress of grievances, which includes meaningful access to the courts. *See California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508 (1972).

104. The Fourteenth Amendment's Due Process Clause protects the fundamental right of access to the courts and prohibits any state action or concerted private conduct that obstructs that right. *See Bounds v. Smith*, 430 U.S. 817 (1977); *Christopher v. Harbury*, 536 U.S. 403 (2002).

B. Factual Allegations Supporting the Violation

105. Plaintiff engaged in protected legal and administrative proceedings, including:

- a. Filing EEOC charges and asserting claims under Title VII and related federal laws;
- b. Seeking modification and redress in Illinois and Ohio tribunals; and
- c. Filing federal actions to protect his civil rights and correct ongoing retaliation and fraud.

106. After Plaintiff initiated and participated in these proceedings, Defendants and those acting in concert with them engaged in coordinated actions designed to obstruct, delay, and retaliate against Plaintiff's exercise of his constitutional right to seek redress.

107. These actions included, but were not limited to:

- a. Ex parte communications between Defendant employers and state judicial officers;
- b. Suppression and concealment of evidence, including the concealment of exhibits relevant to Plaintiff's EEOC and contract claims;
- c. Fraudulent and retaliatory judicial orders, entered without proper service or notice;
- d. Interference with Plaintiff's legal counsel, resulting in counsel withdrawal or conflicts of interest;
- e. Improper garnishment and seizure of funds intended to obstruct Plaintiff's ability to finance legal representation; and
- f. Defamation and publication of judicial materials online to discredit Plaintiff and chill his participation in legal proceedings.

108. Defendants' actions had the intent and effect of obstructing Plaintiff's ability to file, pursue, or fairly adjudicate his claims in both state and federal courts.

109. The coordinated acts of state and private Defendants deprived Plaintiff of a fair and impartial forum in which to assert his claims, thereby violating his constitutional rights.

110. The obstruction was not a result of mere negligence or procedural error but of deliberate acts undertaken to suppress Plaintiff's protected legal activities and shield state and private actors from liability.

C. Acting Under Color of Law

111. The State Defendants, through their official offices and employees, acted under color of state law.

112. Private Defendants—including McGaw Medical Center of Northwestern University, and Wood Health Company, LLC,—acted jointly with state officials and received substantial assistance or direction from them, establishing state action for purposes of 42 U.S.C. § 1983. *See Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970).

D. Nature of the Deprivation

113. Defendants' actions deprived Plaintiff of meaningful access to courts and the ability to seek redress for legal injuries.

114. Defendants' interference also infringed upon Plaintiff's First Amendment right to petition the government and Fourteenth Amendment right to due process of law.

115. As a result, Plaintiff suffered dismissal or adverse rulings in proceedings tainted by extrinsic fraud, financial injury due to improper garnishment, and reputational and emotional harm.

E. Damages and Relief

116. As a direct and proximate result of Defendants' unlawful acts, Plaintiff has sustained:

- a. Loss of access to judicial remedies and relief;
- b. Financial harm, including seizure of funds and loss of employment;
- c. Emotional distress, humiliation, and mental anguish; and
- d. Continuing harm due to ongoing publication and use of false or fraudulent judicial documents.

117. Defendants' actions were willful, malicious, and in reckless disregard of Plaintiff's constitutional rights, entitling Plaintiff to punitive damages.

118. WHEREFORE, Plaintiff respectfully requests that this Court:

- (a) Declare that Defendants' conduct violated Plaintiff's rights to access the courts and to petition for redress under the First and Fourteenth Amendments;

- (b) Enjoin Defendants from any further acts interfering with Plaintiff's access to judicial or administrative proceedings;
- (c) Order the expungement or nullification of fraudulent judicial orders obtained through collusion and concealment;
- (d) Award compensatory and punitive damages in an amount to be proven at trial;
- (e) Award Plaintiff reasonable costs and attorney's fees pursuant to 42 U.S.C. § 1988; and
- (f) Grant such other and further relief as this Court deems just and proper.

Count IV — Pattern of Fraudulent Concealment and Deprivation of Constitutional Rights Under Color of State Law (42 U.S.C. § 1983 and the Fifth and Fourteenth Amendments)
 (Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; US Bank; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes))

119. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

120. This This Court has jurisdiction pursuant to **28 U.S.C. § 1331** (federal question), **28 U.S.C. § 1343(a)(3)** (civil rights violations under color of state law), and **28 U.S.C. § 1367** (supplemental jurisdiction), as this action arises under the **Constitution and laws of the United States**, including 42 U.S.C. § 1983. Venue is proper in this District under **28 U.S.C. § 1391(b)** because the acts and omissions giving rise to this action occurred in part within this District and because Plaintiff is domiciled within this jurisdiction.

121. Plaintiff's *Complaint and Petition for Manifest Injustice* seeks redress for a continuing pattern of misconduct by state judicial officers and opposing counsel acting under color of state law to obstruct justice, conceal procedural irregularities, and deny Plaintiff his constitutional right to due process and equal protection of law.

122. Defendants, acting individually and in concert under color of state law, engaged in a continuing pattern of **fraudulent concealment and procedural manipulation** designed to deprive Plaintiff of his constitutional rights to **notice, an opportunity to be heard, and fair judicial process** guaranteed by the **Fourteenth Amendment's Due Process Clause**.

123. The Plaintiff filed a Change of Address electronically, which was initially rejected by the Ohio court, and then resubmitted and accepted the following day. Following the acceptance of that filing, two new orders appeared on the docket – all alleging that notice was sent to Plaintiff's previous address.

124. Each of those orders was accompanied by *identical praecipes* bearing a handwritten date of "8/25/25" but a typed file date of "8/27/2025" with no indication of which order they

corresponded to, and directing the clerk to serve notice of judgement “within 3 days of journalization”.

125. These events occurred contemporaneously with a pending Amended Federal Complaint before the U.S. District Court for the District of Minnesota, raising federal questions, Diversity Jurisdiction & supplemental jurisdiction questions distinct from, and not duplicative of, the state proceeding.

126. Around this same time, the Illinois state Court sua sponte modified Plaintiff’s Amended complaint, apparently reversing or altering the caption and party alignment *after* the Federal Complaint was dismissed without prejudice – effectively substituting identical defendants between the state and federal actions, eliminating two of the originally named defendants, and removing Plaintiff’s previously approved request for a trial by jury.

127. Plaintiff was not served with any notice or order regarding this sua sponte modification and only discovered the alterations by reviewing the online docket.

128. Upon discovery, Plaintiff promptly filed with the federal court a **Motion for Injunctive Relief, a Notice of Federal Interference**, and a **Petition for Supervisory Order Against the Judicial Officer**, all of which remain pending.

129. Around the same time and on September 15, 2025, Plaintiff filed a Motion to Address Failure of Service in the Ohio State Court pursuant to Ohio Civ.R. 5(B), identifying repeated violations of service requirements that prevented Plaintiff from receiving copies of pleadings and orders materially affecting his rights.

130. On September 17, 2025, Plaintiff filed a Motion to Compel *Proof of Service of Pleadings*, requesting that opposing counsel produce documentation verifying service of filings that Plaintiff never received.

131. On September 23, 2025 - while both matters were pending review—and while an **Affidavit of Disqualification** and **Writ of Prohibition** – concerning judicial bias and jurisdictional overreach were under active consideration—the trial court entered an order sua sponte striking both motions from the record, without hearing, thereby obstructing the preservation of objections of appellate review.

132. The striking of those filings effectively **concealed material procedural irregularities** from the appellate record and **deprived Plaintiff of the ability to preserve objections to defective service**, in violation of **Ohio Civ.R. 12(F)** and **Civ.R. 5(B)** and in contravention of clearly established federal due-process principles.

133. In response, Plaintiff filed:

a. a **Notice of Preservation of Objection to Stricken Filings**, to ensure that the stricken motions and related docket activity were preserved for appellate review under Ohio App.R. 9(A) and 9(E);

b. a **Judicial Notice of Defective Service and Irregular Docket Entries**, pursuant to Ohio

Evid.R. 201, requesting that the court take official notice of its own docket showing missing or incomplete certificates of service and irregularly dated praecipes; and
c. multiple **Notices of Defective Service and Preservation of Objection**, documenting ongoing violations of Civ.R. 5(B) and Plaintiff's non-receipt of critical filings and orders.

134. Despite these filings, the trial court continued to issue orders and accept filings from opposing counsel which bore electronic notations such as "Email/Mail Notify Filed" – but which, when accessed, displayed no certificate of service, no listed recipients, and no indication that Plaintiff was ever properly served by any method authorized under Civ.R. 5(B).

135. Plaintiff's repeated attempts to correct the record, the presiding judge and opposing counsel continued a **pattern of concealment and selective docketing**, including—but not limited to—(i) issuing orders to Plaintiff's previous address after a change-of-address filing had been accepted, (ii) back-dating or altering filing timestamps on praecipes, and (iii) denying or striking filings that sought to document these irregularities.

136. The cumulative effect of this conduct demonstrates a **deliberate pattern of obstruction**, intended to:

- (a) prevent the creation of a complete and accurate record;
- (b) hinder appellate review;
- (c) and falsely suggest that Plaintiff received proper notice and opportunity to be heard when, in fact, he did not.

137. This coordinated pattern constitutes **fraudulent concealment** and a **denial of due process and equal protection**, actionable under **42 U.S.C. § 1983**, as well as a **manifest injustice** warranting extraordinary federal intervention and remedial relief.

138. As a direct and proximate result of Defendants' actions, Plaintiff has suffered continuing harm including loss of procedural rights, reputational damage, emotional distress, and obstruction of access to justice.

139. Plaintiff seeks declaratory and injunctive relief from this Honorable Court to remedy the continuing deprivation of due process, to vacate all orders entered without lawful notice or service, and to compel state judicial officers and clerks to adhere strictly to the procedural requirements of Civ. R. 5(B) and constitutional guarantees of fairness.

140. WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Declare that the described actions constitute violations of Plaintiff's rights under the **Fourteenth Amendment** and **42 U.S.C. § 1983**;
- b. Vacate or enjoin enforcement of orders entered without proper notice or jurisdiction;
- c. Direct remedial and injunctive relief to restore Plaintiff's access to due process and accurate judicial recordkeeping;

- d. Award compensatory and punitive damages as proven at trial; and
- e. Grant such other relief as this Court deems just and equitable.

STATEMENT OF FEDERAL INTEREST AND NECESSITY FOR FEDERAL REVIEW

I. Federal Interest and Necessity for Review

141. Plaintiff acknowledges the principles of federal comity and abstention articulated in *Rooker v. Fidelity Trust Co.*, 263 U.S. 413 (1923), *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983), and *Younger v. Harris*, 401 U.S. 37 (1971). However, the circumstances presented here fall squarely within the narrow and well-recognized exceptions to those doctrines, where state procedures have proven structurally incapable of providing a fair forum or an adequate remedy for the protection of federal rights.

142. The pattern of conduct described herein—including **striking of filings preserving objections, denial of motions addressing defective service, manipulation of filing dates, concealment of orders, and continued judicial action despite pending writs of prohibition and federal proceedings**—demonstrates a systemic deprivation of due process that rises to the level of **manifest injustice** and **extraordinary circumstances** warranting federal intervention.

143. Federal review is necessary where a litigant's rights to notice, participation, and meaningful access to justice have been obstructed by judicial or administrative misconduct, such that the state process itself has become a vehicle for the deprivation of rights rather than their vindication. (See *Johnson v. Mississippi*, 403 U.S. 212 (1971); *Mitchum v. Foster*, 407 U.S. 225 (1972)).

144. The **federal courts retain jurisdiction under 42 U.S.C. § 1983** to review and remedy ongoing violations of constitutional rights by persons acting under color of state law, even where related state proceedings exist, if those proceedings have been conducted in bad faith, with bias, or in a manner designed to evade constitutional protections.

145. The federal interest in safeguarding the integrity of judicial process and the right to due process is paramount where:

- (a) state courts have refused to enforce their own procedural safeguards;
- (b) filings documenting defective service and obstruction have been struck from the record;
- (c) pending writs of prohibition have been disregarded; and
- (d) the cumulative conduct of state actors demonstrates a deliberate effort to prevent review of constitutional violations.

146. Plaintiff does not seek appellate review of a final state judgment. Instead, Plaintiff invokes this Court's original jurisdiction to secure **prospective relief, declaratory judgment, and**

equitable intervention to prevent continuing deprivations of constitutional rights under the **Fifth and Fourteenth Amendments**.

147. Where a state process becomes a “sham proceeding, devoid of constitutional process,” federal intervention is not merely permitted but necessary. (See *Gibson v. Berryhill*, 411 U.S. 564, 579 (1973)). This Court’s exercise of jurisdiction is therefore proper and essential to prevent irreparable harm and restore the integrity of judicial process.

II. Declaratory and Injunctive Relief Requested

148. Plaintiff respectfully requests that this Honorable Court, pursuant to its authority under **28 U.S.C. §§ 1331, 1343, 1651, and 2201–2202**, and **Fed. R. Civ. P. 65**, issue declaratory and injunctive relief as follows:

1. Declaration of Manifest Injustice and Constitutional Violation

Declare that the cumulative conduct of the state court and associated respondents—including the striking of filings, concealment of service, and alteration of docket records—constitutes a **pattern of manifest injustice** and a **denial of Plaintiff’s due process and equal protection rights** under the **United States Constitution**.

2. Declaration Regarding Void or Voidable Orders

Declare that any orders, judgments, or rulings entered without proper service or notice, as required by **Ohio Civ.R. 5(B)** and fundamental due process, are void or voidable ab initio.

3. Emergency and Preliminary Injunction

Enjoin any further judicial action in the related state proceedings—including the issuance or enforcement of any orders—until proper notice and service are confirmed and Plaintiff’s right to participate meaningfully is restored.

4. Permanent Injunction to Prevent Continued Misconduct

Permanently enjoin all state actors, clerks, and participating counsel from:

(a) entering or enforcing orders without verified service;

(b) striking filings documenting procedural defects; or

(c) altering, concealing, or postdating docket entries or filings.

5. Correction and Preservation of Judicial Records

Direct the relevant clerks and respondents to correct and preserve all docket entries and service records, including metadata, time stamps, envelopes, and all correspondence evidencing the true sequence of events.

6. Stay of Related State Proceedings

Issue a temporary and then permanent **stay of related state court proceedings** to prevent further interference with Plaintiff’s federal rights pending this Court’s review.

7. Declaratory Relief on Federal Supremacy and Right to Remedy

Declare that this Court maintains jurisdiction to protect federally guaranteed rights when

state processes fail or are subverted, and that invocation of federal jurisdiction herein is necessary to ensure access to justice.

8. **Ancillary and Equitable Relief**

Award such additional relief as the Court deems just and proper, including but not limited to:

- (a) reasonable costs and fees under **42 U.S.C. § 1988**;
- (b) remedial orders to ensure compliance with constitutional standards; and
- (c) referral of relevant conduct to appropriate disciplinary authorities for review.

149. WHEREFORE, Plaintiff respectfully prays that this Honorable Court enter judgment in Plaintiff's favor and grant the following relief:

1. **Declare** that the conduct of the state court, its officers, and associated counsel as alleged herein constitutes a violation of Plaintiff's rights to due process, equal protection, and access to the courts under the **Fifth and Fourteenth Amendments** to the United States Constitution;
2. **Declare** that any orders, judgments, or docket entries entered without proper notice or service are void or voidable, and direct that such orders be vacated or stayed pending review;
3. **Issue injunctive relief**—temporary, preliminary, and permanent—to prevent any further judicial or administrative actions that would continue, compound, or conceal the deprivation of Plaintiff's constitutional rights;
4. **Stay** all related or overlapping state proceedings pending full federal review and determination of this action;
5. **Order** the correction and preservation of the state court record, including the restoration of all stricken filings and accurate recording of service and docket entries;
6. **Award** Plaintiff reasonable costs, fees, and expenses pursuant to **42 U.S.C. § 1988** and the inherent equitable powers of this Court;
7. **Grant** any further or alternative relief as this Court deems just, equitable, and necessary to restore due process, prevent continuing manifest injustice, and uphold the supremacy of the United States Constitution.

Count V — Denial of Due Process and Equal Protection by Judicial Bias and Procedural Manipulation (42 U.S.C. § 1983; U.S. Const. Amend. I, XIV)

(Defendants US Bank; McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes))

A. Incorporation of Prior Allegations

150. Plaintiff incorporates by reference all preceding paragraphs, exhibits, and factual statements as though fully set forth herein.

B. Jurisdictional and Legal Basis

152. This claim arises under the Due Process and Equal Protection Clauses of the Fourteenth Amendment, enforceable through 42 U.S.C. § 1983, and under the First Amendment right of access to the courts.

Jurisdiction is proper under 28 U.S.C. §§ 1331, 1343, and 1367.

C. Factual Predicate

153. The presiding state court judge, acting under color of state law, entered an order granting Defendant leave to file an amended answer without motion, notice, or opportunity for Plaintiff to be heard.

154. The amended answer, introduced ex parte, added the affirmative defense of res judicata—a defense absent from the original pleading.

155. This ex parte order was not served upon Plaintiff, and no certificate of service indicated notice, date, or method of delivery, in violation of Ohio Civ. R. 5(B) and fundamental principles of due process.

156. The unauthorized amendment enabled Defendant's subsequent Motion for Judgment on the Pleadings, which would have been procedurally defective without the added res judicata claim.

157. Plaintiff filed timely motions and judicial notices challenging the defective service, lack of notice, and procedural irregularities, including:

158. Judicial Notice of Order Entered Without Service;

159. Motion to Vacate Order Entered Without Notice;

160. Motion for Sanctions for Repeated Violation of Civ. R. 5(B); and

161. Judicial Notice of Continuing Defective Service.

162. The presiding judge ignored or struck these motions, asserting that Plaintiff should rely on "periodic review of the docket" in lieu of proper notice — a position contrary to Ohio procedural law and constitutional due process.

163. The cumulative actions of the state tribunal and opposing counsel deprived Plaintiff of a meaningful opportunity to respond, object, or preserve issues for review, thereby violating his constitutional rights.

D. Pattern of Constructive Judicial Bias

164. The state court's pattern of conduct demonstrates constructive judicial bias, where procedural acts consistently favored the Defendant and obstructed Plaintiff's ability to assert and protect his rights.

165. Such bias is evidenced by:

- (a) Selective enforcement of procedural rules;
- (b) Granting relief to Defendant sua sponte or ex parte;
- (c) Disregarding Plaintiff's motions for enforcement of service; and
- (d) Facilitating Defendant's procedural advantage by altering the record post hoc.

166. The Court's irregular orders and dismissive treatment of Plaintiff's filings amount to systemic partiality and retaliatory conduct, violating the constitutional requirement of a fair and impartial tribunal.

E. Constitutional Deprivations

167. Due Process Violation (Fourteenth Amendment):

- (a) Plaintiff was denied notice and an opportunity to be heard before judicial action materially affected his rights.
- (b) Orders entered without service deprived Plaintiff of procedural fairness and the ability to object or seek relief.

168. Equal Protection Violation (Fourteenth Amendment):

- (a) Defendant was afforded procedural leniency and ex parte relief unavailable to Plaintiff, establishing unequal treatment under the law.

169. Access to Courts Violation (First Amendment):

- (a) The manipulation of pleadings and obstruction of Plaintiff's filings hindered his ability to present his claims and pursue judicial redress.

170. These acts were undertaken under color of state law, by officials and agents of the state judiciary, and constitute actionable violations of federal rights under **42 U.S.C. § 1983**.

F. Causation and Harm

171. As a direct and proximate result of these actions:

- (a) Plaintiff suffered deprivation of constitutional rights;

- (b) The judicial process was tainted by bias and irregularity;
- (c) Plaintiff incurred emotional distress, delay, and reputational harm; and
- (d) Plaintiff's access to meaningful appellate or federal review was obstructed.

G. Request for Relief

172. Plaintiff respectfully requests that this Court:

- (a) Declare that the conduct of the state judicial officers and opposing counsel described herein violated Plaintiff's rights under the Fourteenth and First Amendments;
- (b) Issue appropriate injunctive and declaratory relief to prevent further interference, retaliation, or procedural manipulation;
- (c) Vacate or nullify state-court orders entered without notice or jurisdiction;
- (d) Award Plaintiff compensatory and nominal damages for constitutional deprivation and due process violations;
- (e) Grant reasonable costs and attorney's fees pursuant to 42 U.S.C. § 1988; and
- (f) Award such other and further relief as justice may require.

Count VI — COLLUSIVE STATE ACTION, FRAUDULENT COORDINATION WITH DEFENDANT, AND DEPRIVATION OF DUE PROCESS RIGHTS (U.S. Const. Amend XIV)

(Defendants US Bank, McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes))

173. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully restated herein.

174. Plaintiff brings this cause of action for violations of his constitutional rights under the **Fourteenth Amendment** to the United States Constitution, arising from a coordinated pattern of judicial and procedural actions in state court designed to protect Defendant **U.S. Bank** and to deprive Plaintiff of fair process, impartial adjudication, and the opportunity to be heard.

175. Plaintiff was a party to both (a) a **federal proceeding in the U.S. District Court for the District of Minnesota**, in which **U.S. Bank** was a named defendant, and (b) a **parallel state proceeding**, in which the state court explicitly referenced the federal case as a related matter.

176. During the pendency of both actions, **U.S. Bank** engaged in unlawful conduct, including **disclosing Plaintiff's confidential Safe-at-Home address, closing Plaintiff's business bank account, and transferring funds belonging to Plaintiff to an unauthorized private citizen in another state**, thereby causing significant financial and personal harm.

177. Plaintiff immediately filed an **Emergency Motion for Order of Protection and Emergency Hearing** in the state proceeding to safeguard his personal and financial security.

178. Instead of granting protection or even setting a hearing, the state court denied the emergency request and, without explanation, issued an **Order to Show Cause** directed at Plaintiff himself, thereby reversing the roles of the victim and the violator.

179. Plaintiff timely and fully responded to the **Order to Show Cause**, providing proof of U.S. Bank's misconduct and breach of confidentiality.

180. Thereafter, the presiding state judge issued a **Scheduling Order for Trial and Mediation**, and Plaintiff filed an **Application to Proceed In Forma Pauperis (IFP)**, which was accepted by the clerk's office.

181. After the IFP application was filed, Plaintiff **ceased receiving all further correspondence** from the state court or from opposing counsel.

182. On **August 27, 2025**, Plaintiff contacted the clerk's office to inquire about the status of the case and simultaneously filed a **Change of Address**, confirming his continued effort to comply with procedural obligations.

183. Shortly thereafter, Plaintiff received written notice that his case had been **dismissed without prejudice**, without any prior motion to dismiss, hearing, or service of a proposed order by the defendant or the court.

184. Plaintiff immediately filed a **Motion to Reconsider**, explaining the defective service and lack of notice; however, **no acknowledgment or response was ever received** from the court.

185. On **October 10, 2025**, the same date Plaintiff filed his **Complaint and Petition for Federal Remedy for Manifest Injustice** in federal court, the state court issued a **new order**, which Plaintiff received that day, purporting to dismiss **Counts I, II, and V "with prejudice."**

186. The order received on **October 10, 2025** was **backdated to October 1, 2025**—two days *before* Plaintiff had filed an **Exhibit implicating U.S. Bank** in the pending federal complaint—suggesting deliberate backdating to preempt or interfere with Plaintiff's federal action.

187. The backdated and contradictory dismissal order was not served upon Plaintiff electronically or by mail, and its docket entry included only "Email/Mail Notify Filed," with no actual certificate of service or record showing to whom or how the order was sent.

188. These actions, occurring contemporaneously with Plaintiff's pending federal complaint, reveal an **unusual and unlawful alignment** between the state court and **U.S. Bank**, intended to:

- a. Shield the defendant from federal accountability;
- b. Undermine the jurisdiction of the U.S. District Court;
- c. Deprive Plaintiff of due process and equal protection under the law; and
- d. Create a false record to obstruct subsequent federal review.

189. The pattern of backdated orders, denials of emergency relief, absence of notice, and interference with concurrent federal proceedings constitutes **collusive state action under color of law** and violates **42 U.S.C. § 1983**, the **Fourteenth Amendment's Due Process Clause**, and the **Supremacy Clause** of the United States Constitution.

190. Plaintiff seeks declaratory and injunctive relief vacating the orders entered without service, prohibiting further interference by the state court with the pending federal proceedings, and remanding the matter for appropriate review in accordance with constitutional guarantees and federal supremacy.

PRAYER FOR RELIEF

191. WHEREFORE, based upon the foregoing facts and causes of action, Plaintiff respectfully prays that this Honorable Court enter judgment in his favor and against all named Defendants, jointly and severally, and grant the following relief:

Declaratory and Injunctive Relief

1. **Declare** that the acts and omissions of the state judicial officers, opposing counsel, and related defendants described herein constitute violations of Plaintiff's rights to **due process, equal protection, and access to the courts** under the **Fourteenth Amendment** to the United States Constitution.
2. **Declare** that the backdated, unsigned, and unserved orders and docket entries purporting to dismiss Plaintiff's claims "with prejudice" are **void ab initio** for lack of notice, service, and jurisdiction.
3. **Declare** that any reliance by the Illinois or Ohio state tribunals on the disposition of the prior **Title VII federal action**—which was dismissed **without prejudice** and involved **different defendants and causes of action**—constitutes improper judicial reliance and extrajudicial interference with pending federal jurisdiction.
4. **Declare** that the continued failure to properly serve Plaintiff, strike his filings, or conceal docket activity constitutes an **unconstitutional denial of notice and opportunity to be heard**, and violates the principles of procedural due process guaranteed by the Fourteenth Amendment.
5. **Issue an Injunction** prohibiting all named state court defendants, officers, or their agents from:
 - a. Taking any further judicial or administrative action in the underlying state proceedings until the federal court determines the constitutional claims raised herein;
 - b. Modifying pleadings, altering party names, or amending records *sua sponte* in a manner inconsistent with Plaintiff's filings or due process rights; and

- c. Communicating or coordinating with defendants or their counsel in pending or future actions concerning Plaintiff's federal claims.
6. **Issue a Supervisory or Structural Injunction** directing appropriate oversight to ensure future compliance with service requirements, docket transparency, and federal–state jurisdictional boundaries.

Vacatur and Corrective Relief

7. **Vacate** all orders, entries, and dismissals issued without notice, without service, or based on incomplete or fraudulent certificates of service.
8. **Order reinstatement** of Plaintiff's dismissed claims in the state or federal proceedings improperly terminated by the actions described herein.
9. **Refer the matter** for appropriate disciplinary review or federal investigation into judicial conduct, where the evidence suggests backdating, fraudulent docket alteration, or suppression of filings to protect a party defendant.

Compensatory and Equitable Relief

10. Award Plaintiff **compensatory damages** in an amount to be proven at trial, including but not limited to losses resulting from:
 - o Financial injury caused by the unlawful closure of Plaintiff's business account and unauthorized transfer of funds;
 - o Emotional distress and reputational harm resulting from disclosure of Plaintiff's confidential Safe-at-Home address; and
 - o Costs and expenses incurred in defending against and remedying the unlawful judicial actions described herein.
11. Award **punitive damages** against the defendants whose conduct was willful, malicious, or carried out in reckless disregard of Plaintiff's federally protected rights.
12. Award **attorney's fees and costs** pursuant to 42 U.S.C. § 1988 and other applicable law.

Further Relief

13. Grant such other and further relief as this Court deems just and proper, including but not limited to structural oversight, federal monitoring of the affected state proceedings, or additional equitable remedies necessary to restore Plaintiff's constitutional rights and ensure the integrity of the judicial process.

Count VII — Interference with Federal Tribunal and Retaliatory Adjudication (42 U.S.C. § 1983; U.S. Const. Arts. VI, III; Amends. I & XIV)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes))

A. Incorporation of Prior Allegations

192. Plaintiff incorporates by reference all preceding paragraphs, exhibits, and factual statements as though fully set forth herein.

B. Jurisdiction and Authority

193. This claim arises under the Supremacy Clause (U.S. Const. art. VI), the Due Process and Equal Protection Clauses of the Fourteenth Amendment, and the First Amendment right of access to courts, all enforceable under 42 U.S.C. § 1983.

194. Jurisdiction and venue are proper in this Court pursuant to 28 U.S.C. §§ 1331, 1343, 1367, and 1391, as the events giving rise to this claim occurred in part within this District and involve interference with a pending federal proceeding before the U.S. District Court for the District of Minnesota (Eighth Circuit).

C. Factual Predicate

195. While Plaintiff's federal action asserting federal-question, diversity, and supplemental jurisdiction was pending in the United States District Court for the District of Minnesota, state-court officials and opposing counsel in an Ohio civil action undertook acts that interfered with that federal proceeding.

196. Opposing counsel filed memoranda in the Ohio action referencing a federal court opinion from a separate Title VII case involving different defendants and distinct causes of action, falsely asserting that such opinion constituted res judicata against Plaintiff's state claims.

197. The presiding Ohio judge adopted that characterization in rulings and orders entered while Plaintiff's federal case remained pending and before any final adjudication on the merits.

198. Despite Plaintiff's filing of a Writ of Prohibition in the Ohio appellate court—seeking to halt further proceedings until jurisdictional conflicts and federal interference could be resolved—the state judge continued to act, issuing substantive orders referencing federal matters and facilitating motions designed to prejudice Plaintiff's pending federal claims.

199. These actions coincided with a pending federal motion for injunctive relief and notice of interference filed by Plaintiff in the Eighth Circuit, demonstrating active federal judicial consideration of the same subject matter.

200. The continuation of state proceedings during the pendency of the writ and the federal injunctive request constituted direct interference with a federal tribunal, violating principles of comity, due process, and supremacy of federal jurisdiction.

201. The pattern of procedural manipulation—including defective service, ex parte orders, and unauthorized amendments to pleadings—further reveals a retaliatory intent to frustrate Plaintiff's exercise of constitutional rights and access to federal relief.

D. Constitutional and Statutory Violations

202. Violation of the Supremacy Clause (Art. VI, cl. 2):

(a) State judicial officers acted in disregard of federal jurisdiction and pending proceedings, effectively nullifying federal authority and encroaching upon the constitutional separation of judicial sovereignty.

203. Violation of the Due Process Clause (Fourteenth Amendment):

(a) Plaintiff was deprived of fair notice, impartial adjudication, and the right to have federal issues heard in a federal forum without state interference.

204. Violation of the First Amendment (Access to Courts):

(a) By using state-court processes to mischaracterize and pre-adjudicate pending federal issues, Defendants chilled and obstructed Plaintiff's lawful pursuit of federal remedies.

205. Retaliation for Protected Activity (42 U.S.C. § 1983):

(a) Plaintiff's participation in protected civil-rights litigation and whistleblower activity prompted coordinated judicial and prosecutorial actions designed to retaliate, intimidate, and impair access to justice.

E. Causation and Injury

206. As a direct and proximate result of these acts:

- (a) Plaintiff's federal claims were publicly misrepresented and prejudiced;
- (b) State-court rulings were tainted by reliance on non-final and inapplicable federal opinions;
- (c) Plaintiff suffered reputational, professional, and emotional harm; and
- (d) Plaintiff's access to impartial judicial review was materially obstructed.

F. Relief Requested

207. Plaintiff respectfully requests that this Court:

- (a) Declare that the acts of the Ohio state-court officials and opposing counsel described herein violated Plaintiff's constitutional rights and the Supremacy Clause;
- (b) Issue an injunction prohibiting further interference with Plaintiff's federal proceedings, including any state-court adjudication of overlapping or derivative issues;
- (c) Order the vacatur of any state orders entered in violation of comity or due process;

- (d) Award compensatory and nominal damages for constitutional deprivation;
- (e) Award costs and reasonable attorney's fees under 42 U.S.C. § 1988; and
- (f) Grant such other and further relief as the Court deems just and proper.

Count VII — Retaliation for Protected Activity (42 U.S.C. § 1983)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and U.S. Bank National Association)

208. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

209. This Count arises under 42 U.S.C. § 1983, which provides a remedy to individuals deprived of rights secured by the Constitution and laws of the United States by persons acting under color of state law.

210. The Fourteenth Amendment guarantees that no state shall deprive any person of life, liberty, or property without due process of law, and that all persons shall receive equal protection of the laws.

211. A civil rights conspiracy exists under §1983 where two or more persons, acting under color of law, conspire to deprive another of constitutional rights. *See Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970); *Dennis v. Sparks*, 449 U.S. 24 (1980).

C. Factual Allegations Supporting the Violation

212. Plaintiff engaged in protected legal and administrative actions, including Title VII complaints, contract enforcement actions, and civil rights proceedings in multiple jurisdictions.

213. In retaliation and to obstruct Plaintiff's lawful redress, Defendants and their agents entered into an agreement, tacit or express, to use state judicial machinery and official authority to deprive Plaintiff of constitutional rights.

214. Upon information and belief, this coordinated conduct included:

- a. Defendant McGaw's use of its influence and connections to prompt adverse judicial actions in a domestic proceeding while Plaintiff was a resident of Minnesota;
- b. Communication and coordination between the Illinois employer, Ohio employer, and judicial officers to create parallel proceedings and adverse orders undermining Plaintiff's pending civil rights complaints;

- c. Improper disclosure of Plaintiff's confidential financial information by Defendant U.S. Bank to one or more state entities, in violation of Minnesota privacy and banking laws;
- d. Fraudulent use of garnishment and support orders to seize funds from Plaintiff's Minnesota-based financial accounts, without notice or due process;
- e. Defamatory and false publication of judicial records and orders by or at the direction of state actors, with intent to discredit Plaintiff and chill future protected activity;
- f. Suppression of Plaintiff's pleadings and exhibits in state tribunals, and manipulation of dockets and hearings to foreclose fair adjudication; and
- g. Use of state power and judicial orders to intimidate, obstruct, and financially harm Plaintiff, preventing him from exercising his constitutional and statutory rights.

215. Each Defendant acted either directly or in concert with others to perpetuate this coordinated deprivation.

216. The conspiratorial actions of Defendants resulted in:

- (a) Loss of Plaintiff's business and professional reputation;
- (b) Unlawful seizure and closure of his financial accounts;
- (c) Loss of parental rights and family access;
- (d) Loss of home; and
- (e) The inability to obtain fair judicial review in multiple jurisdictions.

217. Defendants' concerted efforts were motivated by discriminatory animus and retaliatory purpose, particularly following Plaintiff's protected civil rights activities and filings before the EEOC and federal courts.

D. Acting Under Color of Law

218. The State Defendants, through their offices, agencies, and representatives, acted under color of state law.

219. The private Defendants—including McGaw Medical Center of Northwestern University, Wood Health Company, LLC, and U.S. Bank National Association—acted jointly and in concert with state officials and received significant aid, encouragement, and cooperation from them, satisfying the "under color of law" requirement for §1983 liability.

See Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982).

E. Nature of the Deprivation

220. The actions of Defendants, acting in concert, deprived Plaintiff of:

- (a) His liberty interest in family relationships and parental access;
- (b) His property interests in earned income, bank deposits, and real property;
- (c) His right to due process before deprivation of those interests;
- (d) His right to equal protection of the laws; and
- (e) His right to seek redress and access an impartial tribunal.

- (f) The deprivation was accomplished through extrinsic fraud, procedural manipulation, and the misuse of state processes for retaliatory and obstructive purposes.
- (g) The conduct described herein constitutes a pattern of ongoing civil rights violations that continues to cause harm in Minnesota, where Plaintiff resides and where part of the injury—including closure of accounts and publication of false records—occurred.

F. Damages and Relief

221. As a direct and proximate result of Defendants' actions, Plaintiff has suffered:

- (a) Economic loss, including seized wages and closed accounts;
 - (b) Loss of employment and business opportunities;
 - (c) Loss of familial relationships and reputation;
 - (d) Severe emotional distress and mental anguish; and
- Continuing injury due to ongoing use and publication of fraudulent judicial records.

222. Defendants' conduct was intentional, malicious, and in reckless disregard of Plaintiff's constitutional rights, warranting compensatory and punitive damages.

223. WHEREFORE, Plaintiff respectfully requests that this Court:

- (a) Declare that Defendants' conduct constituted a conspiracy under 42 U.S.C. § 1983;
 - (b) Declare that the acts described deprived Plaintiff of liberty and property interests without due process of law and denied equal protection;
 - (c) Enjoin Defendants from continuing to use fraudulent or retaliatory judicial orders or records;
 - (d) Order the restoration and correction of official records affected by such conduct;
 - (e) Award compensatory and punitive damages in an amount to be proven at trial;
 - (f) Award Plaintiff costs, interest, and attorney's fees pursuant to 42 U.S.C. § 1988; and
- Grant such other and further relief as this Court deems just and proper.

Count VIII — Conspiracy to Interfere with Civil Rights (42 U.S.C. § 1985(3))

(Defendants U.S. Bank, McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and all other persons acting in concert with them, whether named or unnamed)

224. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

225. This cause of action arises under 42 U.S.C. § 1985(3), which prohibits conspiracies to deprive any person or class of persons of the equal protection of the laws or of equal privileges and immunities under the laws.

226. To state a claim under § 1985(3), Plaintiff must show:

- (a) A conspiracy;

- (b) For the purpose of depriving a person or class of persons of equal protection or equal privileges;
- (c) An act in furtherance of the conspiracy; and
- (d) An injury or deprivation of rights resulting from that act. *See Griffin v. Breckenridge*, 403 U.S. 88 (1971); *Haddle v. Garrison*, 525 U.S. 121 (1998).

227. The conspirators need not all be state actors; a § 1985(3) claim may lie against private parties who conspire with state officials or among themselves to achieve unconstitutional objectives.

B. Factual Allegations Supporting the Conspiracy

228. Beginning in or about 2021 and continuing through the present, Defendants and their agents entered into a tacit and/or express agreement to retaliate against, intimidate, and obstruct Plaintiff's lawful pursuit of civil rights, employment, and judicial remedies.

229. The conspiracy's objectives included:

- a. Suppressing Plaintiff's exercise of protected rights under 42 U.S.C. §§ 1981 and 1983 and the First and Fourteenth Amendments;
- b. Preventing Plaintiff from obtaining and retaining lawful employment by circulating defamatory statements and false records;
- c. Using state judicial machinery to impose unlawful orders, seizures, and liens without due process; and
- d. Deterring Plaintiff and similarly situated individuals from engaging in protected legal activity opposing race-based discrimination and retaliation.

230. Defendants knowingly communicated and coordinated across state lines—including through Illinois, Ohio, and Minnesota—by electronic correspondence, telephonic communications, and court filings, to advance the conspiracy's objectives.

231. The acts in furtherance of the conspiracy included, without limitation:

- (a) The filing and manipulation of duplicative or fraudulent state proceedings to discredit Plaintiff's pending federal claims;
- (b) The misuse of subpoenas, garnishments, and judicial orders to seize Plaintiff's property and finances;
- (c) Dissemination of false or defamatory records to prospective employers and public agencies;
- (d) Concealment or suppression of material evidence in state tribunals; and
- (e) Coordinated efforts to obstruct Plaintiff's access to counsel and to federal courts.

232. These actions were motivated by discriminatory and retaliatory animus directed at Plaintiff as a member of a protected class and as a citizen asserting civil-rights protections guaranteed by federal law.

233. The conspiracy was facilitated by the cooperation of both public and private actors, including certain judicial officers and employers in Illinois and Ohio employers (McGaw and Wood Health);

C. Injury and Deprivation

234. As a direct and proximate result of Defendants' conspiracy and acts in furtherance thereof, Plaintiff suffered:

- (a) Loss of employment and future career opportunities;
- (b) Financial deprivation through unlawful garnishments and account closures;
- (c) Emotional distress, humiliation, and reputational harm;
- (d) Loss of parental and familial relations; and
- (e) Continued denial of access to an impartial forum to redress these wrongs.

235. The overt acts of each Defendant were intended to, and did, deprive Plaintiff of the equal protection of the laws, and were carried out with reckless disregard for Plaintiff's federally protected rights.

D. Willfulness and Class-Based Animus

236. The conspiratorial conduct described herein was motivated, at least in part, by class-based, invidiously discriminatory animus based on Plaintiff's race and his opposition to racially discriminatory and retaliatory practices, in violation of *Griffin v. Breckenridge*, *supra*.

237. Alternatively, Defendants' concerted actions were undertaken in retaliation for Plaintiff's exercise of federal rights to petition and seek redress, which independently satisfies § 1985(3) when the conspirators' purpose is to hinder or punish federal court access. *See Kush v. Rutledge*, 460 U.S. 719 (1983).

E. Relief Requested

238. Plaintiff is entitled to recover compensatory and punitive damages for the injuries sustained as a result of Defendants' unlawful conspiracy.

239. Plaintiff further seeks declaratory and injunctive relief to prevent Defendants from continuing to disseminate false information, enforce fraudulent orders, or otherwise act in concert to obstruct Plaintiff's civil rights.

240. WHEREFORE, Plaintiff respectfully requests that this Court:

- (a) Declare that Defendants' conduct constituted a conspiracy to interfere with Plaintiff's civil rights in violation of 42 U.S.C. § 1985(3);
- (b) Permanently enjoin Defendants and their agents from continuing such conduct;
- (c) Award Plaintiff compensatory and punitive damages in an amount to be determined at trial;
- (d) Award Plaintiff his costs and attorney's fees pursuant to 42 U.S.C. § 1988; and
- (e) Grant such other and further relief as the Court deems just and proper.

Count IX — Invasion of Privacy/Breach of Safe at Home Confidentiality
(Minn. Stat. §§ 5B.01-5B.12; Common Law Right of Privacy; 42 U.S.C. §1983)
(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC;
State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel.

Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and all other persons acting in concert with them, whether named or unnamed)

241. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

242. This cause of action arises under:

- a. Minn. Stat. §§ 5B.01–5B.12, which establish Minnesota’s Safe at Home address confidentiality program to protect participants from disclosure of residential addresses and identifying information;
- b. The common law torts of invasion of privacy, intrusion upon seclusion, and public disclosure of private facts recognized under Minnesota law; and
- c. The Fourteenth Amendment and 42 U.S.C. § 1983, insofar as Defendants, acting jointly and under color of state law, violated Plaintiff’s constitutional right to privacy and informational security.

B. Factual Allegations

243. At all times relevant, Plaintiff was a duly certified participant in Minnesota’s Safe at Home program, established pursuant to Minn. Stat. ch. 5B, and was entitled to the full confidentiality protections afforded by law.

244. Plaintiff’s true residential address and contact information were statutorily confidential and maintained only by the Minnesota Secretary of State.

245. Defendants, including one or more Illinois judicial officers and Illinois state agencies, obtained knowledge of Plaintiff’s confidential address and other identifying information through indirect communications with Defendant U.S. Bank National Association, whose principal offices are in Minnesota and which maintained Plaintiff’s business and deposit accounts.

246. Defendant U.S. Bank, without warrant, subpoena, court order, or Plaintiff’s consent, disclosed Plaintiff’s personal identifying and financial information—including Plaintiff’s residential address—to third parties outside Minnesota.

247. The unauthorized disclosures enabled one or more Illinois state officials to identify Plaintiff’s location and initiate garnishment, closure, or seizure of Plaintiff’s Minnesota bank accounts.

248. No notice of such disclosures or account closures was provided to Plaintiff’s Safe at Home address, telephone number, or email address on file with U.S. Bank, contrary to statutory and contractual obligations.

249. The disclosure of Plaintiff’s confidential Safe at Home address and related data directly contravened:

- (a) Minn. Stat. § 5B.07, which prohibits disclosure of a participant's address except as expressly authorized;
- (b) Minn. Stat. § 13A.02, which restricts government access to financial records absent lawful process; and
- (c) Minn. Stat. § 46A.02, which mandates that financial institutions safeguard customer information.

250. Upon information and belief, Defendants exchanged this information deliberately and in concert for the purpose of assisting out-of-state litigation adverse to Plaintiff, constituting a knowing and willful breach of Plaintiff's statutory and constitutional privacy rights.

C. Injury and Damages

251. As a direct and proximate result of Defendants' wrongful acts and omissions, Plaintiff suffered:

- (a) Compromise of his legally protected confidential address and location;
- (b) Loss of financial access due to account closures and garnishments;
- (c) Fear, humiliation, emotional distress, and loss of security associated with the exposure of his
- (d) Safe at Home identity; and
- (e) Consequential damages from the misuse of unlawfully disclosed information in out-of-state judicial proceedings.

252. Defendants' actions were undertaken with willful disregard for Plaintiff's statutory protections, and with knowledge that unauthorized disclosure of Safe at Home participant data poses grave safety and privacy risks.

D. Relief Requested

253. Plaintiff seeks:

- a. A declaration that Defendants' disclosure and use of Safe at Home information violated Minn. Stat. §§ 5B.01–5B.12 and Plaintiff's constitutional rights to privacy and due process;
- b. An injunction prohibiting Defendants from any further dissemination or use of Plaintiff's confidential address, identifying information, or financial records;
- c. Compensatory and punitive damages in an amount to be determined at trial;
- d. Costs, disbursements, and reasonable attorney's fees under 42 U.S.C. § 1988 and Minn. Stat. § 5B.11; and
- e. Such other and further relief as this Court deems just and equitable.

254. WHEREFORE, Plaintiff respectfully demands judgment against Defendants for violation of Plaintiff's privacy and confidentiality rights, and for all declaratory, injunctive, and monetary relief described herein.

Count X — Defamation and False Light (Minnesota Common Law; 42 U.S.C. §1983 – Constitutional Deprivation of Liberty Interest in Reputation)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel.

Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and all other persons acting in concert with them, whether named or unnamed)

255. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Legal Basis

256. This cause of action arises under:

- a. The common law torts of defamation and false light recognized under Minnesota law; and
- b. 42 U.S.C. § 1983, insofar as the acts of Defendants, acting under color of state law and in concert with one another, deprived Plaintiff of a protected liberty interest in his reputation, professional standing, and good name without due process of law, in violation of the Fourteenth Amendment.

B. Factual Allegations

257. Defendants knowingly and willfully disseminated, published, or caused to be published false and disparaging statements concerning Plaintiff, both in court filings and in communications to third parties, including but not limited to employers, counsel, and financial institutions.

258. Defendant McGaw Medical Center of Northwestern University, directly and through its representatives, disseminated false statements alleging professional misconduct, moral unfitness, and disreputable behavior by Plaintiff, with the intent and effect of harming Plaintiff's career prospects and reputation.

259. Defendant Wood Health Company, LLC, in coordination with Illinois state officials, furthered this campaign by engaging in extrajudicial communications with tribunals and third parties to characterize Plaintiff as dishonest, unstable, or professionally incompetent, despite actual knowledge of the falsity of such assertions.

260. Defendants' false and defamatory statements were included in, or attached to, judicial filings that were later unlawfully published online and indexed by public search engines, including Google, causing widespread and ongoing reputational harm to Plaintiff.

261. Upon information and belief, certain of these publications were deliberately maintained on public databases to ensure their accessibility to potential employers, clients, and professional peers, constituting a knowing and malicious act of professional defamation.

262. Defendant U.S. Bank National Association, by disclosing Plaintiff's confidential Safe at Home information and closing his business bank account without lawful basis, created a public implication of financial misconduct or fraud, further placing Plaintiff in a false light before the public.

263. Defendants' collective actions were not mere negligence but part of a coordinated effort to damage Plaintiff's credibility and foreclose his access to fair adjudication and future employment opportunities, constituting a deliberate deprivation of liberty interest protected under the Fourteenth Amendment.

264. Defendants acted with actual malice, knowing that their statements were false or with reckless disregard for their truth, and with the intent to injure Plaintiff's reputation, cause emotional distress, and destroy his ability to obtain future employment in his professional field.

D. Injury and Damages

265. As a direct and proximate result of Defendants' defamatory publications and false light portrayals, Plaintiff suffered:

- (a) Severe reputational injury and loss of standing in his professional community;
- (b) Loss of employment and future economic opportunities;
- (c) Emotional distress, humiliation, and anxiety; and
- (d) Continuing harm due to the permanent digital publication of defamatory statements.

266. The wrongful conduct of Defendants constitutes defamation per se, as it imputes dishonesty, professional incompetence, and misconduct in Plaintiff's trade or occupation, and is actionable without proof of special damages.

D. Relief Requested

267. Plaintiff seeks:

- a. A declaration that Defendants' statements and publications were false, defamatory, and made in reckless disregard of the truth;
- b. An injunction requiring Defendants to retract and remove the defamatory publications from all public sources and court-related databases under their control;
- c. Compensatory damages in an amount to be determined at trial for reputational harm, economic loss, and emotional distress;
- d. Punitive damages sufficient to deter similar misconduct;
- e. Costs and attorney's fees under 42 U.S.C. § 1988 and applicable Minnesota law; and
- f. Such other and further relief as this Court deems just and proper.

268. WHEREFORE, Plaintiff respectfully demands judgment against all Defendants, jointly and severally, for defamation and false light invasion of privacy, and requests all declaratory, injunctive, and monetary relief described herein.

Count XI — DEFAMATION, FALSE LIGHT, AND DENIAL OF DUE PROCESS BY MISUSE OF PUBLICLY ACCESSIBLE COURT INFORMATION

**(Pursuant to 28 U.S.C. §§ 1331, 1343(a)(3), 1367 – U.S. Const. amend. I, XIV;
Minnesota common law)**

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC;
CaseMine, Inc; Justia, Inc., State of Illinois ex rel. Office of the Attorney General (official

capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes); and all other persons acting in concert with them, whether named or unnamed

269. Plaintiff realleges and incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

270. Defendants, acting individually, jointly, or in concert, directly or indirectly caused, permitted, or facilitated the **publication and online optimization** of judicial materials and memoranda falsely implying that Plaintiff had been subject to a **final judgement on the merits** in prior civil actions, when in fact **no such judgement existed**, and the underlying federal matter was dismissed **without prejudice** on procedural grounds only.

271. The misleading materials contained phrases such as “**Final Judgement**” and were indexed and optimized to appear under Plaintiff’s **personal name** and **business name**, creating the false implication that Plaintiff had lost on the merits of multiple civil actions.

272. Plaintiff was **never served** with a formal copy of the final memorandum or order referenced in the publications, having been **denied access to CM/ECF filing privileges**, and only discovered the alleged ruling online in search results of his name.

273. The publication of this materially misleading content constitutes ongoing **reputational, economic, and emotional harm**, and is part of a broader pattern of retaliation and obstruction of Plaintiff’s access to justice.

A. Defamation and False Light

274. The publications are **false and misleading statements of fact** concerning Plaintiff.

275. They were **publicized to third parties** through online platforms accessible nationally.

276. They convey that Plaintiff was the subject of a **final adjudication adverse to him**, which is demonstrably false.

277. The publications were made **recklessly, negligently, or with actual malice**, and remain publicly accessible despite requests for correction and removal.

278. As a result, Plaintiff has suffered **loss of reputation, embarrassment, mental anguish**, and economic harm, including diminished business goodwill, because the defamatory listings had appeared above Plaintiff’s own business in search results.

B. Denial of Due Process and Manifest Injustice

279. These actions constitute a **deprivation of Plaintiff’s right to due process** under the **Fourteenth Amendment**, insofar as judicial records were misused or misrepresented to the public, creating a false judicial narrative.

280. These false publications have **prejudiced Plaintiff's ability to litigate pending claims**, obstructed fair adjudication, and contributed to the ongoing **manifest injustice** alleged throughout this Complaint.

281. This misconduct is also part of a broader pattern of **retaliation** against Plaintiff for engaging in protected activity.

C. Damages

282. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered:

- (a) Reputational and professional harm;
- (b) Loss of business opportunities and goodwill;
- (c) Emotional distress; and
- (d) Ongoing injury to legal rights and access to justice.

283. **WHEREFORE**, Plaintiff respectfully requests that this Court:

- (a) Declare Defendants' publication and optimization of false judicial information to be **defamatory, false-light invasion of privacy, and a violation of due process**;
- (b) Enter an order **compelling correction, removal, or retraction** of misleading publications;
- (c) Award **compensatory and punitive damages** for reputational, economic, and emotional harm;
- (d) Grant injunctive relief preventing further dissemination of false or misleading content;
- (e) Award attorney's fees and costs under 42 U.S.C. § 1988 and applicable law; and
- (f) Grant such other and further relief as the Court deems just and proper

Count XII — Petition for Federal Remedy for Manifest Injustice and Denial of Constitutional Rights

(Pursuant to 28 USC §§1331, 1343, 2201, and 1651(a); U.S. Const. Amends. V & XIV)

(Defendants McGaw Medical Center of Northwestern University; Wood Health Company, LLC; State of Illinois ex rel. Office of the Attorney General (official capacity); State of Ohio ex rel. Office of the Attorney General (official capacity); and State of Minnesota ex rel. Office of the Attorney General (official capacity, for venue and oversight purposes; and all other persons acting in concert with them, whether named or unnamed)

284. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Nature of this Petition

285. This Count constitutes a Petition for Federal Remedy invoking this Court's inherent equitable and supervisory authority, the Declaratory Judgment Act, and the All Writs Act, to redress and prevent ongoing constitutional injury, systemic denial of due process, and the

perpetuation of manifest injustice arising from the coordinated acts of Defendants and associated state instrumentalities.

286. Plaintiff seeks intervention and declaratory relief not merely as a matter of private redress, but to vindicate federal constitutional guarantees of due process, equal protection, and access to an impartial tribunal.

B. Legal Basis

287. The **Fifth and Fourteenth Amendments** to the U.S. Constitution guarantee that no person shall be deprived of life, liberty, or property without due process of law and that all persons shall receive equal protection of the laws.

288. Under **28 U.S.C. § 1651(a)**, the federal courts are empowered to issue writs “necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.”

299. Under **28 U.S.C. § 2201**, federal courts may declare the rights and legal relations of parties in cases of actual controversy.

300. These statutory and constitutional authorities collectively authorize the federal judiciary to intervene when state processes or private actors acting under color of state law have systemically denied a litigant constitutional fairness, thereby rendering state remedies inadequate.

C. Factual Allegations Supporting Manifest Injustice

301. As alleged in detail in preceding Counts, Defendants—acting in concert and under color of state law—engaged in a coordinated pattern of interference with Plaintiff’s access to impartial adjudication in both Illinois and Ohio tribunals.

302. Through acts including ex parte communications, fraudulent orders, concealment of service, misuse of judicial authority, and the extrajudicial publication of defamatory materials,

303. Defendants caused the constructive denial of Plaintiff’s fundamental rights to: fair notice and opportunity to be heard, impartial adjudication free from corruption or external influence, freedom from retaliatory deprivation of property and employment, and protection from reputational and familial destruction through abuse of judicial mechanisms.

304. The cumulative result of these acts has been to defeat the core constitutional purpose of due process—a fair and neutral forum—and to perpetuate ongoing injury through continued reliance upon and publication of fraudulent or void judicial orders.

305. These actions constitute manifest injustice: a condition in which the normal operation of law has been subverted to such an extent that constitutional rights cannot be vindicated through existing state procedures.

306. The inclusion of the State of Minnesota, ex rel. Office of the Attorney General, in this Petition is for venue, jurisdictional propriety, and oversight purposes, as the injuries to Plaintiff's financial and privacy interests occurred within Minnesota, and continuing relief will require enforcement within this district.

D. Continuing Harm and Federal Necessity

307. The ongoing use and dissemination of fraudulent orders and defamatory materials continue to inflict irreparable harm to Plaintiff's constitutional rights, employment prospects, and familial relationships.

308. State remedies have proven inadequate, as those same judicial actors whose conduct caused the injury continue to control the state forums in which redress would otherwise be sought.

309. Absent federal intervention, Plaintiff's constitutional rights will remain denied, and **the manifest injustice already committed** will persist unchecked.

E. Relief Requested

310. WHEREFORE, Plaintiff respectfully petitions this Court to:

- (a) Declare that the acts, omissions, and proceedings described herein—occurring in the States of Illinois and Ohio—were undertaken in violation of Plaintiff's constitutional rights to due process, equal protection, and access to an impartial tribunal;
- (b) Declare that all orders and judgments obtained through fraud, concealment, ex parte communication, or bias are constitutionally void and unenforceable;
- (c) Enjoin any further enforcement, reliance upon, or collateral use of such void and fraudulent orders by any state actor, agency, or private party acting under color of law;
- (d) Mandate appropriate federal oversight to ensure that any future related proceedings be conducted before impartial tribunals consistent with due process and equal protection;
- (e) Affirm that Plaintiff's rights to pursue relief under 42 U.S.C. §§ 1981, 1983, and 1985 are protected from interference, retaliation, or obstruction by any state or private actor;
- (f) Award equitable and supervisory relief under 28 U.S.C. §§ 2201 and 1651(a) to prevent ongoing manifest injustice and restore the integrity of the judicial process;
- (g) Award compensatory and punitive damages as warranted to redress the constitutional and economic injuries sustained;
- (h) Grant such other and further relief as this Court deems just, equitable, and proper in the interests of justice.
- (i) JURY DEMAND. Plaintiff demands a trial by jury on all issues so triable.

Count XIII — Violation of Minn. Stat. § 13A.02 (Unauthorized Access to Financial Records) (Defendant U.S. Bank)

311. Plaintiff re-alleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

312. Defendant U.S. Bank National Association (“U.S. Bank”) maintained a business account in Plaintiff’s name, with Plaintiff as the sole depositor and account holder.

313. Plaintiff was a participant in Minnesota’s **Safe-at-Home Address Confidentiality Program**, which protects the location and identifying information of program participants from unauthorized disclosure.

314. Without notice to Plaintiff and **without a judicial subpoena, search warrant, or administrative order**, U.S. Bank disclosed, transmitted, or otherwise made available Plaintiff’s private financial records and account information to one or more out-of-state judicial officers or government agencies located in Illinois.

315. Such disclosure included or revealed Plaintiff’s confidential Minnesota address and financial identifiers.

316. These actions violated **Minn. Stat. § 13A.02**, which expressly prohibits any financial institution from releasing or transferring a customer’s financial records to a government authority except pursuant to lawful process or with the customer’s written consent.

317. Defendant’s disclosure was willful, reckless, or negligent and directly resulted in the unauthorized release of Plaintiff’s confidential information, subsequent retaliatory garnishments, and economic and reputational injury.

318. As a proximate result, Plaintiff suffered loss of funds, business disruption, emotional distress, and invasion of statutory and constitutional privacy rights.

319. WHEREFORE, Plaintiff demands judgment against U.S. Bank National Association for actual, statutory, and punitive damages, declaratory relief deeming the disclosure unlawful, and such other relief as the Court deems just and proper.

Count IV — Violation of Minn. Stat. § 46A.02 (Safeguarding Customer Information)

(Against Defendant U.S. Bank)

320. Plaintiff re-alleges and incorporates all preceding paragraphs.

321. Under Minn. Stat. § 46A.02, financial institutions in Minnesota are required to implement and maintain procedures reasonably designed to safeguard the confidentiality and integrity of customer information.

322. Defendant U.S. Bank failed to employ adequate administrative, technical, and physical safeguards to prevent unauthorized access to Plaintiff’s financial records.

323. Defendant admitted that the release of Plaintiff’s account information and subsequent account closure resulted from “technical error” and/or “human error,” confirming its failure to meet the standard of care required by statute.

324. As a direct and foreseeable result, Plaintiff's confidential financial information was accessed and transmitted to unauthorized parties, causing financial loss, reputational harm, and emotional distress.

325. Defendant's conduct constitutes a violation of Minn. Stat. § 46A.02 and demonstrates reckless disregard for the security of customer data.

326. WHEREFORE, Plaintiff seeks compensatory and punitive damages, declaratory relief finding U.S. Bank's safeguards inadequate under Minnesota law, and such other and further relief as the Court deems equitable and proper.

Count XV — Violation of Minn. Stat. § 325D.44 (Deceptive Trade Practices)
(Against Defendant US Bank)

327. Plaintiff re-alleges and incorporates all preceding paragraphs.

328. Defendant U.S. Bank represented to Plaintiff and the public that it maintained secure, confidential, and protected financial services in compliance with state and federal law.

329. Defendant's representations were false and misleading because it failed to protect Plaintiff's confidential records, disclosed such records without lawful authority, and closed Plaintiff's business account without prior notice or explanation.

330. Defendant's conduct constitutes deceptive and unfair trade practices under Minn. Stat. § 325D.44, subd. 1(13), (17), and related provisions.

331. Defendant's actions were willful, reckless, or grossly negligent, likely to cause confusion and misunderstanding among consumers, and resulted in direct injury to Plaintiff's business and personal interests.

332. Plaintiff is entitled to injunctive and monetary relief under Minn. Stat. § 325D.45, including reasonable attorney's fees and costs.

333. WHEREFORE, Plaintiff requests:

- (a) A declaratory judgment that U.S. Bank's conduct constitutes deceptive trade practices;
- (b) An injunction prohibiting further dissemination or use of Plaintiff's financial data;
- (c) Compensatory and punitive damages; and
- (d) Such other relief as this Court deems just and proper.

VI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully prays that this Honorable Court enter judgment in Petitioner's favor and grant the following relief:

1. Declare Defendants' acts unconstitutional and in violation of Minnesota law;

2. Declare all fraudulent, coercive, or unauthorized orders and disclosures void and unenforceable;
3. Enjoin Defendants from further disclosure, enforcement, or retaliation;
4. Direct oversight to ensure future proceedings respect Plaintiff's constitutional rights;
5. Award **compensatory, statutory, and punitive damages**;
6. Award **injunctive relief**, including protection of Safe-at-Home confidentiality;
7. Award costs and attorney's fees under 42 U.S.C. § 1988;
8. Grant any additional relief necessary to prevent manifest injustice; and
9. **Empanel a jury for all triable issues.**

A. Declaratory and Injunctive Relief

1. **Declaration of Constitutional Violation**
Declare that the acts, omissions, and proceedings described herein—occurring in the State of Illinois and the State of Ohio—were undertaken in violation of Petitioner's rights to due process, equal protection, and access to an impartial tribunal under the Constitution of the United States.
2. **Declaration that Fraudulent Orders Are Void and Unenforceable**
Declare that any orders, judgments, or directives issued in the referenced Illinois and Ohio proceedings, obtained through extrinsic fraud, concealment of service, ex parte communications, or judicial bias, are constitutionally void and unenforceable.
3. **Prospective Injunctive Relief**
Enjoin any further enforcement, reliance upon, or collateral use of such void and fraudulent orders by state actors, agencies, or private parties acting under color of state law, where such enforcement would perpetuate ongoing violations of Petitioner's constitutional rights.
4. **Restoration of Access to Impartial Adjudication**
Direct appropriate federal oversight, including a mandate to ensure that any future proceedings in related state or federal matters be conducted before impartial tribunals that comply with the requirements of due process, equal protection, and fair procedure.
5. **Protection of Federal Civil Rights Remedies**
Declare that Petitioner's rights to pursue federal civil rights relief under 42 U.S.C. §§ 1981, 1983, and 1985 are protected from interference, intimidation, retaliation, or obstruction by any state actor, officer of the court, or private individual acting under color of law.
6. **Equitable and Supervisory Relief to Prevent Manifest Injustice**
Grant such further declaratory and equitable relief as may be necessary under 28 U.S.C. § 2201 and the All Writs Act, 28 U.S.C. § 1651(a), to prevent manifest injustice, protect the integrity of the judicial process, and restore Petitioner's constitutional rights.

7. Other Relief Deemed Just and Proper

Grant such other and further relief as this Court deems just, equitable, and proper in the interests of justice.

B. Monetary and Compensatory Relief

8. Award Plaintiff compensatory damages in an amount to be determined at trial for economic, emotional, and reputational harm.
9. Award punitive damages against private Defendants for willful and malicious conduct.
10. Award Plaintiff costs, fees, and attorney's fees pursuant to 42 U.S.C. § 1988.
11. Grant any other relief the Court deems just and proper, including restoration of Safe-at-Home confidentiality and safeguards against further unauthorized disclosures.

C. Prayer for Relief (as to Counts against U.S. Bank)

12. Plaintiff respectfully requests that this Court:
13. Declare that Defendant U.S. Bank violated Minnesota law and Plaintiff's statutory privacy rights;
14. Award compensatory, statutory, and punitive damages in an amount to be determined at trial;
15. Issue injunctive relief to prevent further dissemination or use of Plaintiff's financial information; and
16. Grant such further equitable relief as the Court deems just and proper.

VII. CONCLUSION

For the reasons set forth herein, Petitioner respectfully requests that this Honorable Court exercise its equitable and constitutional authority to prevent further manifest injustice and irreparable harm.

Petitioner seeks a federal remedy for the continuing violations of due process, equal protection, and access to the courts that have arisen through actions taken under color of state law in the States of Illinois and Ohio, and respectfully requests declaratory and prospective injunctive relief as outlined in the foregoing *Prayer for Relief*.

Petitioner further requests such other and additional relief as this Court deems just, equitable, and proper in the interests of justice and in the preservation of constitutional rights.