

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS

Thomas C.Fernandez, O.M.

Plaintiff,

vs.

Meier Clinics of Illinois P.C., An Illinois Company
Defendants.

vs.

Dr. Steve Lee

3rd Party Defendant.

vs.

Meier Clinics of Illinois' Insurance Company
3rd Party Defendant.

vs.

Hall, Prigel, and Shooveldt

3rd Party Defendant.

Candice Adams
e-filed in the 18th Judicial Circuit Court
DuPage County
ENVELOPE: 31941388
2025LA000304
FILEDATE: 3/24/2025 12:00 AM
Date Submitted: 3/22/2025 9:46 PM
Date Accepted: 3/24/2025 11:34 AM
BC

Case No.

2025LA000304

VERIFIED AMENDED COMPLAINT

NOW COMES the Plaintiff, Thomas C. Fernandez, by and through his attorney, _____ Pro_Se _____, and as his Complaint against the Defendant, Meier Clinics of Illinois P.C., states as follows:

PARTIES

1. The Plaintiff, Thomas C. Fernandez (Fernandez) is an individual residing in DuPage County, Illinois and was a former patient of Meier Clinics of Illinois, P.C.
2. The Defendant, Meier Clinics of Illinois, P.C., (Meier) is an Illinois corporation with its principal office and registered agent's address at 2100 Manchester Road, Suite 1510, Wheaton, Illinois. Steve Lee, is an agent of Meier Clinic of Wheaton.
3. Hall, Prigel, and Shooveldt were hired to represent Meier Clinic of Wheaton, on two separate divorce, and medical malpractice, cases, filed by the Plaintiff.
4. Meier, Clinic of Wheaton, nor Hall, Prigel, and Shooveldt, have felt motivated, to divulge Meier's insurance company.

COUNT I - PROFESSIONAL NEGLIGENCE - INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS

5. The Defendant caused the Plaintiff's divorce, through a combination of, and resulting in, medication mismanagement, fraud, slander, libel, defamation, threats, misstatements, HIPPA violations, lack of informed consent, determining a course of treatment without consultation, breaches of duty, breaches of privacy, breaches of trust, breaches of contract, due diligence failures, operating in bad faith, coercion, serious misconduct, hate speech, death threats, falsification of medical records, and falsification of prescription records.

6. Leading to errors and omissions, intimidation tactics, civil rights violations, constitutional rights violations, theft, biblical sin, Hippocratic oath violations, intention to incite violence, intention to do bodily harm, intentional infliction of emotional distress, and intention to deprive civil liberties.

7. Leading to submitting fraud to a court of law, submitting incomplete inaccurate and misleading information to a court of law, breach of duty to uphold the law, entrapment, attempted entrapment, negligent homicide, attempted manslaughter, misdiagnosis/no diagnosis, diagnosis of a non-patient, lack of informed consent-coercion, collusion, censorship, ignorance, gross negligence, criminal negligence, assault, battery, baby snatching, homewrecking, verbal abuse, refusal to do their job, sexual discrimination, general discrimination, harassment, deceitful business practices, and false advertising.

8. The Plaintiff sustained extensive injuries, due to medication mismanagement, and lack of informed consent, in the period leading up to the Plaintiff's divorce, including a broken leg, five bruised ribs, four cracked teeth, one broken hand, extensive dermatological issues, loss of weight, and divorce.

9. The Plaintiff's losses sustained due to divorce include, but are not limited to, loss of home, divorce, loss of dog, loss of family, loss of job, loss of future income, loss of future children, loss of future, numerous other financial damages, and damage to both the Plaintiff's personal, and professional reputation.

10. The Plaintiff states that the infliction of emotional distress was intentional on the Defendant's part. The Defendant laughed.
11. Please see: (DuPage County Court Case Numbers 2022LA1051, 2023LA1091, 2023LA449, 2024LA638, and 2024LA1242 for additional information).
12. Please see: (Affidavit of Damages (Original: May of 2022 / Revised: March of 2025)).

WHEREFORE, the Plaintiff prays this honorable Court find in its favor and enter judgment against the Defendant as to Count I of this Complaint in an amount in excess of \$50,000.00, and for any other relief the Court deems just and appropriate.

DAMAGES

AFFIDAVIT OF DAMAGES (UPDATED: MARCH 2025)

NOW COMES the Affiant, Thomas Fernandez and under oath states as follows:

1. I am an adult over the age of 18 years old and am competent to attest to the facts in this matter, not being under any disability.
2. That the Defendant intentionally, and maliciously, through gross negligence, ALL ENCOMPASSING MEDICAL MALPRACTICE, and for enjoyment, caused catastrophic damages, COERCING THE PLAINTIFF OUT OF THEIR MARRIAGE, between September of 2021, and May of 2022, with damages moving forward throughout the rest of the Plaintiff's life.
3. The amount owed for the damages, and future liabilities incurred, resulting from divorce & all-encompassing medical malpractice are:
 - A. **Legal Fees of Divorce:** Fernandez incurred \$2,500 in attorney's fees.
 - B. **Loss of Affection:** \$50,000
 - C. **Pain and Suffering (2025):** \$100,000
 - D. **Loss of Marriage & Emotional Support Structure:** \$50,000
 - E. **Gross Negligence:** \$50,000
 - F. **Divorce Under the Care of a Mental Health Professional, who Caused the Divorce, After Causing the Divorce:** \$50,000
 - G. **IVF Reimbursement Expense:** \$20,000.00
 - H. **Future Life-Time Support Liability Incurred (2025):** \$40,321,920
 - I. **Reimbursement Expense for MSA Settlement (Moral Obligation to Repay):**
\$12,500.00
 - J. **Moving and Storage Expense (2025):** \$4,980

- K. Rental Expense (2025): \$46,800**
- L. Living Expenses, Non-ordinary (2025): \$25,000**
- M. Replacement Value of Home per Independent Appraisal (Due to a typo, this was stated as \$350,000 on the original damages, in May of 2022. Revised 2024): \$320,000**
- N. Replacement Value of Vehicle: \$60,000.00**
- O. Loss of Community: \$50,000**
- P. Loss of Goodwill and Lifetime Favors: \$50,000**
- Q. Employee Loan Reimbursement Expense: \$70,000**
- R. Loss of Professional Reputation: \$50,000**
- S. Replacement Value of Marital Property: \$100,000.00**
- T. Breach of Trust: \$50,000**
- U. Breach of Privacy (Missed on Original Damages in May of 2022. (2025)): \$100,000**
- V. Loss of Future Income: \$6,500,000**
- W. Legal Fees, Attorney Expense, and Fines (No jury trial. Revised 2024): \$6,500**
- X. Medical Malpractice Attorney's Fees and Expenses: \$25,000**
- Y. Loss of Marital Settlement Agreement Rights, Replacement Value of Dog (Missed on Original Damages in May of 2022. Updated 2024.): \$1000 (priceless)**
- Z. Therapy Expense: \$9,828**
- AA. Pro Se Representation, Research, and Literary Fees (2025): \$180,000**
- AB. Outside Legal Consultation (2025): \$90,000**
- AC. Nonrefundable Educational Expenses (2025): \$53,000**
- AD. Trailer Purchase (2025): \$5,000**
- AE. Interest Expense on Damages (3-years, 2025): \$394,000**

4. To date, the Defendant has not made payment toward any of the damages.

Further the Affiant sayeth naught.

MEDICAL RECORDS

13. Fernandez refutes ALL medical records already submitted to this court, in the previous, or current, lawsuits.
14. Fernandez refutes ALL medical records, that have not been independently substantiated, and verified, against tele-health videos, or recorded phone calls, and compared with phone company phone records, prescription records, personal records, previous medical records, and other materials.
15. Meier states that the tele-health videos, and recordings of phone calls, are unavailable, and are not considered to be a part of the medical record.
16. The tele-health videos, and recorded phone conversations, have not been used in the medical record verification process, or while seeking certification.

WITNESS CONTACT INFORMATION

Walgreens

The Expert Institute

Rapier Law

Dr. Daniel P. Fisher

Timothy Whelan Law

Hall, Prager, and Shooveldt

Peskind Law

Dupage county, Illinois

Kane county, Illinois

Judge Neal Cerne

The State of Illinois

The Fernandez family et. al.

The Chrisos Family et. al.

Dan Nold Law

Facebook.com

Diane F.

Megan C.

The extended Fernandez family

The extended Chrisos family

“Everyone Else”

CERTIFICATE OF MERIT

14. The Defendant confirmed their own medical malpractice, and breach of trust, in writing, to the Plaintiff, in May of 2022.
15. As such, a qualified “mental health care professional,” with the required training, certifications, and a comparable level of experience, has stated that this case is, in fact, medical malpractice.
16. Certification of Merit was sought, and paid for, during the review process.
17. Due to extensive fraud, and omissions, from the medical records, various individuals, businesses, and expert witnesses, have been unable to independently certify medical malpractice.
18. This case does not require a Certificate of Merit, as the Defendant operated outside of their medical authority, as a doctor, and psychiatrist, in diagnosing a non-patient, leading to the Plaintiff’s divorce.
19. A Certificate of Merit had been provided, below.

2022LA001051

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DuPage County
ENVELOPE: 22854536
2022LA001051
FILEDATE: 5/24/2023 9:00 AM
Date Submitted: 5/24/2023 9:00 AM
Date Accepted: 5/25/2023 8:09 AM
JRB

**CERTIFICATE OF MERIT
FOR ALL-ENCOMPASSING
MEDICAL MAL PRACTICE
WHICH THE PLAINTIFF
ACTUALLY DIED FROM &
LOST EVERYTHING.**

**PER STATE OF ILLINOIS LEGISLATION
& SWORN ON THIS 20TH DAY
OF MAY IN THE YEAR OF OUR
LORD 2023**

**THIS CERTIFICATE OF MERIT HOLDS
ALL LEGAL POWER & IS
MERITORIOUS OF
MEDICAL MAL PRACTICE.**




THOMAS C. FERNANDEZ

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Thomas C. Fernandez', is written over a horizontal line. The signature is stylized with a large, sweeping 'T' and a long, horizontal stroke extending to the right.

Thomas C. Fernandez

VERIFICATION

State of Illinois }
County of DuPage } SS

The undersigned, deposes and states that he is the Plaintiff in this matter, and under penalties of perjury, does hereby state that the information contained herein is true and correct to his best knowledge and belief.


Thomas C. Fernandez

Subscribed and sworn to before me this
7th Day of March 2025


Notary Public



Filer:
Thomas Fernandez
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West Chicago, IL 60185
630-649-4467
Pro Se