

## Case No.

### VERIFIED 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.

COUNT I - PROFESSIONAL NEGLIGENCE - BREACH OF PRIVACY  
or "Be careful how you talk to my wife, and mother"

3. The Defendant caused the Plaintiff's divorce, in October, of 2021, or over the preceding fifteen (15) months.
4. In May, of 2022, the Defendant ended their business relationship with the parting advice, "Be careful how you talk to your ex-wife" - Steve Lee
5. The Plaintiff has spent the intervening 900+ days, since the Defendant made this statement, attempting to clear their name from the Defendant's fraudulent statements, which caused the Plaintiff's divorce.
6. The Defendant was grossly negligent in not specifying, "EVERYONE ELSE."
7. This statement came after Meier: diagnosed Fernandez's wife, who is not a patient of Meier as being "psychotic"; determined a course of treatment without consulting Fernandez; caused Fernandez's divorce, in which his wife received everything; attempted to coerce Fernandez into hospitalization, and medication increase; coerced Fernandez out of his home, marriage, and family; attacked, and threatened, Fernandez, Fernandez's wife, and mother; ignored Fernandez's repeated statements that he was over-medicated, for fifteen months; inappropriately wee(a)ned Fernandez off medications, repeatedly, and laughed; ignored extensive, and repeated, personal injuries caused to Fernandez, due to medication mismanagement, and medication side-effects, including, but not limited to, a broken leg, five bruised ribs, four cracked teeth, a broken hand, and a melted face; and tried to frame Fernande , and Fernandez's family, for their divorce, which the Defendant caused, through a combination of 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, coercion, serious misconduct, hate speech, death threats, intimidation tactics, civil rights violations, constitutional rights violations, theft, biblical sin, and etc.

10. The Plaintiff states that the breaches of privacy were not an isolated incident, and are directly tied to the extensive, and extreme, physical injuries, and financial damages.
11. Please see: (DuPage County Court Case Numbers 2022LA1051, 2023LA1091, and 2024LA000638, for additional information).
12. Please see: (Affidavit of Damages (Original: May of 2022 / Revised: April of 2024)).

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: APRIL 2024)

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:** \$50,000
  - 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 WITHOUT VISITATION:**  
\$40,321,920
  - I. **Reimbursement Expense for MSA Settlement (Moral Obligation to Repay):**  
\$12,500.00
  - J. **Moving and Storage Expense:** \$2,340

- K. Rental Expense: \$14,400**
- L. Living Expenses, Non-ordinary (Updated 2024): \$12,500**
- 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. Updated 2024): \$50,000**
- 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, Replacment Value of Dog (Missed on Original Damages in May of 2022. Updated 2024.): \$1000 (priceless)**
- Z. Therapy Expense: \$9,828**
- AA. Interest Expense on Damages (2-years, 2024): \$2,940,000**

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. Fernande 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 Shofeld

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

### 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

Candice Adams  
e-filed in the 18th Judicial Circuit Court  
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 20<sup>TH</sup> 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



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  
14th Day of March 2024

  
Notary Public

Filer:

Thomas Fernandez

480 Roosevelt Rd., Suite 203

West Chicago, IL 60185

630-649-4467

Pro Se

