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

Thomas C. Fernandez. )

)

Plaintiff, )

)

VS. )

)

Meier Clinics of Illinois, P.C., )

An Illinois Corporation, )

Defendant. )

Case No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

VERIFIED COMPLAINT

NOW COMES the Plaintiff, Thomas C. Fernandez, by and through his attorney, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 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.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

1. That Defendant is engaged in the business of providing psychiatric services and counseling to the public.
2. Fernandez was a client of the Defendant's for a period beginning sometime in 2016 through May 7th,2022.
3. Dr. Steve C. Lee (Dr. Lee) is an employee of Meier and was the treating physician during all times in question.

COUNT I

PROFESSIONAL NEGLIGENCE FAILURE TO KEEP HIS PERSONAL COMMENTS TO HIMSELF

(Running his mouth after causing Fernandez’s Divorce)

1. On May 4th, after causing Fernandez’s divorce with inappropriate communications with Fernandez’s wife. Dr. Lee stated “Be careful how you talk to your ex-wife”.
2. It was actually how Dr. Lee spoke to Fernandez’s wife.
3. Fernandez responded in writing.
4. Fernandez’s comments were directed at his psychiatrist, but his wife was included on the email chain.
5. Fernandez’s ex-wife sought an order of protection.
6. Fernandez was then found in violation of the order of protection, because his mother purchased flowers for his ex-wife.
7. Fernandez also posted pictures of his ex-wife on Facebook.
8. Fernandez received a second violation of the order of protection, for these pictures.
9. Dr. Lee is primarily liable.
10. That Fernandez suffered extreme pain and anguish, personally, due to the Dr. Lee’s comments, fraudulent statements, misdirection, lies, and HIPPA violations, and the ensuing order of protection.
11. That the damages pled hereafter under separate paragraph, are incorporated herein.

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 $100,000.00, and for any other relief the Court deems just and appropriate.

COUNT II

INTENTIONAL MALFEASENCE

1. Plaintiff incorporates and re-alleges paragraphs 1 through 16 of the Complaint as though fully set forth herein.
2. Fernandez believes that due to Dr. Lee causing Fernandez’s divorce, and his comments leading to the order of protection, that Dr. Lee intended to permanently and irrevocably destroy Fernandez’s reputation.
3. The Plaintiff incorporates the list of damages stated later herein, as damages resulting hereunder.

 WHEREFORE, the Plaintiff prays this honorable Court find in its favor and enter judgment against the Defendant as to Count II of this Complaint in an amount in excess of $100,000.00, and for any other relief the Court deems just and appropriate.

DAMAGES

1. Due to the Dr. Lee’s destructive and intentional damage to Fernandez’s relationship, loss of affection, and the ensuing negative legal impact, the following damages were incurred.
2. **Negative Legal Impact:** Shortly after the divorce was entered, and prompted by Dr. Lee, Fernandez sent a variety of e-mails concerning his psychiatrist's treatment to his psychiatrist. His ex-spouse, family, and his family were also included. Due to his general condition from the withdrawal from the drugs and as they were excerpts from his journal during withdrawal, the emails further damaged his relationships. His wife sought an order of protection.
3. **Legal Fees and Attorney Expense:** $2,500
4. **One Night in Jail:** $1,000,000
5. **Loss of Marital Settlement Agreement Rights**: Fernandez is also prevented from seeing his dog.

Respectfully Submitted

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**VERIFICATION**

State of Illinois )

 ) ss

County of DuPage )

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

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Thomas C. Fernandez

Subscribed and sworn to before me this

\_\_\_\_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_, 2022

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Notary Public