

TO: Women of Illinois

FROM: Jocelyn Floyd, Esq., Thomas More Society, national public interest law firm
based in Chicago, IL
Emily Zender, Illinois Right to Life, a human life and women's health
educational not-for-profit

RE: **Crimes Against Women's Health In Illinois and Lack of Accountability By
the State**

DATE: February 11, 2014

SUMMARY

On September 6, 2011, Women's Aid Clinic (the "Clinic") was fined \$36,000 by the Illinois Department of Public Health ("IDPH") for egregious crimes against women's health. Following the IDPH's assessment of violations and fines, the Clinic declared it no longer existed and had no assets. No public health announcement was issued to the women of Illinois who were treated by this clinic.

This memorandum will detail the egregious health violations discovered by the IDPH. This memorandum will also show compelling evidence that the owners of the Clinic reorganized as Women's Aid **Center** instead of Women's Aid **Clinic** and continued to provide services to women while skirting the IDPH fine.

This situation creates a dangerous precedent regarding the lack of accountability for centers that focus on women's health. The State of Illinois has not enforced the power of the IDPH to hold women's health centers accountable to the standards required to protect patients' health. The State's refusal to hold women's health centers to the highest safety and sanitary standards demands an immediate investigation as to why women are not treated equally in Illinois.

Women's Aid Clinic / Women's Aid Center

On September 6, 2011, IDPH inspected the Clinic for the first time in 15 years. The Clinic was immediately shutdown on an emergency basis. [Exh. A-1]

The following itemization is a list of some of the violations IDPH documented in their inspection report:

- "The facility's failure to initiate and perform CPR in accordance with the Facility's policy for a patient who died after the performance of a surgical procedure." [Exh. A-2]
- The clinic contained expired medical supplies.
- The biohazard refrigerator contained eight products of conception (tissue) in the same refrigerator as medications and frozen TV dinners.

- “The recovery room technician (E#1) was observed on 9/6/11 at approximately 9:20AM retrieving a paper towel from a garbage receptacle and using the same paper towel to cover a tray that would serve food items to patients.”
- “The suction machine in OR #1 ‘contained clear water with specks of floating debris....five (5) of 5 recovery beds were rusty....Nine (9) medication cups, identified as containing Motrin and 10 medications cups containing Tylenol contained crumbs.’”
- “The facility’s failure to ensure that a registered nurse supervise and provide medication in order to ensure that medications were provided by personnel licensed for medication administration.”

On October 21, 2011, Dr. Craig Conover, acting director of the IDPH, issued a Notice of Fine Assessment to the Clinic, assessing fines for the violations totaling \$36,000. [Exh. A-3]

In October of 2011, IDPH suspended the facility’s license #7001647 stating that “the public interest, health, safety or welfare imperatively requires” that the Clinic’s license be suspended on an emergency basis. [Exh. A-3]

On November 5, 2011, Ms. Larisa Rozansky, the owner of the Clinic, issued a letter informing Ms. Byerley, Assistant General Counsel for the IDPH, that “Women’s Aid Clinic, IDPH LIC. NO 7001647 will be closing as of November 10, 2011.” This letter also withdrew the Clinic’s request for a hearing before the IDPH. [Exh A-4]

On January 12, 2012, the Assistant Director of IDPH, Teresa Garate Ph.D., signed a final order to withdraw the Clinic’s hearing request and to finalize the findings and fines assessed by the IDPH against the Clinic. [Exh. A-5]

On March 7, 2012, William A. Bell, Chief of the Division of Health Care Facilities and Programs of the IDPH, issued a letter to the Clinic demanding it obey the orders of the IDPH. [Exh. A-6]

- I. “Pursuant to Women’s Aid Clinic’s decision to close, the Clinic MUST return the physical license to IDPH.”
- II. “Pursuant to Women’s Aid Clinic’s decision to withdraw its hearing request, the Clinic MUST pay the Department the Thirty Six Thousand dollar (\$36,000) fine assessed...”
- III. “Pursuant to Women’s Aid Clinic’s decision to withdraw its license and cease operations as a licensed ASTC, the Clinic Must immediately cease and desist from advertising its ability to perform any and all services that would require an active and valid license.”

On March 13, 2012, Women’s Aid Clinic owner Larisa Rozansky mailed the physical license to the IDPH. Ms. Rozansky stated in her letter, “On December 9, 2011, the new company has been formed and temporarily occupies this location. Temporarily, they have been using our old website but they plan to relocate and launch the new website very soon....The Women’s Aid

Clinic **does not exist and does not have any assets or associated bank accounts.**” [Exh. A-7, emphasis in original]

On August 28, 2012, the Illinois Attorney General filed a lawsuit against the Clinic in Cook County Circuit Court to compel it to pay the \$36,000.00 fine to the IDPH. [Exh. A-8]

On January 14, 2014, following multiple continuances in the lawsuit, oral arguments were held. During the oral arguments, attorneys for the Clinic claimed that the entity no longer existed and only had \$77 remaining in its bank account, which it requested be accepted to serve as full payment of the fines.

Itemized below, however, is compelling evidence that the Clinic has abused Illinois corporate law protections in order to duck the consequences of its IDPH sanitary violations. Instead of an entity that no longer exists, it has in fact renamed itself as “Women’s Aid Center” and has continued its business without interruption a mere mile and a half from its original location. A portion or all of this evidence was produced during oral arguments to Judge Alexander White:

- According to the Illinois Secretary of State’s Department of Business Services’ corporate database, Women’s Aid **Clinic** was incorporated on December 2, 1991, with Larisa Rozansky as President and Secretary. [Exh. A-9]
- According to the Illinois Secretary of State’s Department of Business Services’ corporate database, Women’s Aid **Center** was incorporated on December 9, 2011, with Larisa Rozansky as President and Secretary—a mere twenty-nine (29) days after the announced closure of the Clinic. [Exh. A-10]
- Women’s Aid Center (the new entity) continued to operate in the same facility and location as the Clinic until it was evicted. [Exh. A-11]
- Women’s Aid Center continues to this day to use the same phone number as the Clinic. [Exh. A-12 (The Clinic) & Exh. A-13 (The Center)]
- Ms. Larisa Rozansky admitted during the hearing that Women’s Aid Center continued to process transactions under the old corporation’s Merchant Account Number for a period of time.
- Women’s Aid Center continues to use nearly the exact website design as the Clinic. [Exh. A-12 (The Clinic) & Exh. A-13 (The Center)]
 - A Google search for “Women’s Aid Clinic of Lincolnwood” brings up, as the *first* result, a website labeled “Women’s Aid Clinic” at the URL www.womensaidcenter.com. [Exh. A-14]
 - A Google search for “Women’s Aid Clinic” brings up as the second result a website labeled “Women’s Aid Clinic” at the URL www.womensaidcenter.com. [Exh. A-15]

- A Google search for “Women’s Aid Center” brings up, as the *first* result, a website labeled “Women’s Aid Clinic” at the URL www.womensaidcenter.com. [Exh. A-16]
- Women’s Aid Center for a period of time used the same URL as the Clinic. [Exh. A-6]
- The legal eviction notice was filed and granted under the old name, Women’s Aid Clinic, on April 13, 2012, over five months after the announced closure of the Clinic. [Exh. A-11]

Despite these facts, Cook County Circuit Court Judge Alexander White accepted the argument that Women’s Aid Clinic and Women’s Aid Center are two completely separate corporations and therefore reduced the fine against the Clinic to \$77—the entire amount the “non-existent” Clinic claimed to have in its bank account. [Exh. A-17]

The women of Illinois depend on the IDPH to protect our health by ensuring that the clinics we trust with our health are safe. The IDPH protects women by requiring clinics to meet sanitary standards and imposing consequences when those standards are violently disregarded. Allowing a clinic with despicable sanitary violations to pay a \$77 fine, simply because it changed its name and moved down the street, hobbles the IDPH in its ability to protect women.

On behalf of the women of Illinois, we demand the Attorney General’s office appeal Judge White’s verdict. All the Illinois Attorney General needs to do to appeal is file a one-page notice with the Illinois Appellate Court.

On Thursday, February 13, 2014, the Illinois Attorney General office’s opportunity to protect women through an appeal expires.

ILLINOIS DEPARTMENT OF PUBLIC HEALTH

DIVISION OF HEALTH FACILITIES STANDARDS
STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION

☒ ASTC☐ HHA☐ HMO☐ HOSPICE☐ HOSPITAL

NAME AND ADDRESS Women aid Clinic 4751 West Touhy Ave. Lincolnwood, IL 60712
 OF FACILITY

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.220	<p>Organizational Plan</p> <p>An organizational plan shall be known to the staff and available for public information in the facility...document shall set forth the organization, duties...accountability of professional staff and other personnel...all owners, administrators..shall act in accordance with this document..will be reviewed at regular inspections by the Department.</p> <p>This requirement is not met as evidenced by:</p> <p>Findings include:</p> <p>A. Based on Facility's policy and procedure manual reviews and staff interview, it was determined that the Facility failed to ensure the Facility had an Organizational Plan.</p>		

DATE OF SURVEY 9/7/11

BY 07105

(Surveyor)

(Provider's Representative)

NOTE: IF PLV, INDICATE DATE OF PRIOR SURVEY

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Exhibit
A-1

**ILLINOIS DEPARTMENT OF PUBLIC HEALTH
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NAME AND ADDRESS Women Aid Clinic 4751 West Touhy Lincolnwood, IL 60646
OF FACILITY

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG		COMPLETION DATE
205.220 cont.	Organizational Plan Findings include: <ol style="list-style-type: none"> On 9/6/11 at approximately 9:00AM, the Facility's policy and procedure manual was reviewed. The manual lacked a written organizational plan. The above findings were confirmed with the medical Director and Owner/Administrator during an interview on 9/7/11 at approximately 2:00PM. 		

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NAME AND ADDRESS Women's Aid Clinic 4751 West Touhy Ave. Lincolnwood, IL 60712
OF FACILITY

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205.230(a)(2)	<p>Standards of Professional Work The consulting committee shall review development and content of the written policies and procedures of the center...granting privileges...quality of surgical procedures...evidence ...shall be recorded in minutes.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on review of Facility's policy and procedure manual, consulting committee meeting minutes review, and staff interview, it was determined that the Facility failed to ensure that consulting committee minutes were available for review.</p> <p>Findings include:</p>		

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OF FACILITY

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG		COMPLETION DATE
205.230 (a)(2) Cont.	<p>1. On 9/6/11 at approximately 9:30AM, the policy and procedure manual was reviewed. The policy for consulting committee included, "There is a qualified consulting committee for Women's Aid Clinic...shall meet not less than quarterly.. document each meeting with written minutes...shall.. review development and content of policy and procedure .."</p> <p>2. On 9/6/11 at approximately 9:00AM during the entrance conference the</p>		

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205.230(a)(2) Cont.	<p>Surveyors requested the consulting committee meeting minute for six (6) months for review during survey process. The Facility failed to provide surveyors with meeting minutes as requested.</p> <p>3. On 9/6/11 at approximately 2:00PM the Owner/Administrator did not provide the surveyors with the consulting committee meeting minutes.</p> <p>4. The above findings were verified by the Medical Director during an interview on 9/7/11 at approximately 2:30PM.</p>		

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Women's Aid Clinic 4751 West Touhy Lincolnwood, IL 60712

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205.230 (5)	<p>Standards of Professional Work</p> <p>The consulting committee shall act as a tissue committee and shall review at least quarterly pathological reports from procedures performed by each physician on staff. Evidence of such review shall be recorded in the minutes.</p> <p>This requirement is not met as evidenced by:</p> <p>A Based non- availability of the Consulting Committee minutes for 2010 and 2011, it was determined that the facility failed to ensure quarterly pathology reports were reviewed.</p> <p>Findings include:</p>		

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205.230 (5) cont	<p>Standards of Professional Work</p> <ol style="list-style-type: none"> 1. On 9/7/11 at approximately 11:00AM, the consulting committee minutes for 2010 and 2011 were requested again. The facility was unable to produce the consulting committee minutes to review documentation for pathology reports reviewed. 2. The above findings were confirmed with the Administrator during an interview on 9/7/11 at approximately 2:00PM. 		

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205.230 (b))(2)	<p>Standards of professional Work The Medical Director shall responsible for the implementation of medical policies and procedures contained in the facility's policies and procedure manual governing the professional personnel Involved directly in care of patients undergoing surgical procedures, including their preoperative and post operative care and follow up.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on policy , "Anesthesia flow chart/narcotic record" a list of anesthesia medications reviews, and staff interview, it was determined that the facility Medical Director failed to ensure standards of practice were implemented followed in regards to an inventory system that accounted for the receipt, administration, disposition and wastage of narcotics and sedatives.</p>		

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NAME AND ADDRESS OF FACILITY Women's Aid Clinic 4751 West Toughy Ave Lincolnwood, IL 60712

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205.230 (b) (2) cont	<p>Standards of Professional Work</p> <p>Findings include:</p> <ol style="list-style-type: none"> 1. On 9/7/11 at approximately 11:00AM, an untitled facility policy included, "Any narcotic shall be secured by being locked in a cupboard and shall be recorded on a control sheet when administered to a patient. They shall be counted at the beginning of each procedure day. All other medications shall be maintained in cupboards and or drawers..." 2. On 9/7/11 at approximately 11:30AM, the surveyor requested a list of medication and narcotic count documentation. The Administrator stated that she does not count medications. A single locked drawer in the medical records room contained an array of medications that were scattered in the draw. 		

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NAME AND ADDRESS
OF FACILITY Women's Aid Clinic 4751 West Touhy Lincolnwood II 60712

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205.230 (b) (2) cont	<p style="text-align: center;">Standards of Professional Work</p> <p>3. On 9/7/11 at approximately 2:00PM, the Administrator provided a list of anesthesia medications. The document titled, "Meds For Anesthesia" listed 27 medications. There was no inventory or accounting system for each of the medications. As a result, medications were not accurately tracked or documented.</p> <p>4. An interview was conducted with the Certified Nurse Anesthetist (CRNA E#5) who provided anesthesia on 9/6/11. The CRNA stated that the facility does not perform a perpetual inventory to account for narcotics and or sedatives. The CRNA recognized that the narcotic sheets do not contain documentation of drug doses given.</p> <p>5. The above findings were discussed with the Medical Director during an interview on 9/7/11 at approximately 3:00PM.</p>		

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NAME AND ADDRESS Women's Aide Clinic 4751 West Toughy Ave Lincolnwood IL 60712
OF FACILITY

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.240	<p>Policies and Procedures Manual</p> <p>The Management/owner of the ambulatory surgical treatment center shall formulate a written policies and procedures manual. This shall be done in cooperation with the medical and professional staff and shall be approved by the consulting committee. These procedures shall provide for the acceptance, care, treatment, anesthesia services, discharge, referral, and follow up of all patients and all incidental operations of the facility. This manual shall be available to all staff in the center and shall be followed by them at all times in the performance of their duties.</p> <p>This requirement is not met as evidenced by:</p>		

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205.240 cont	<p>Policies and Procedures Manual</p> <p>A. Based on review of the facility's policy and procedures manual and staff interview, it was determined that the facility failed to ensure the manual included patient discharge criteria and an RH negative protocol.</p> <p>Findings include:</p> <ol style="list-style-type: none"> 1. On 9/6/11 at approximately 11:00AM, the policy and procedure manual was reviewed. The manual lacked patient discharge criteria and a protocol for RH negative patients. 2. The above findings were confirmed by the Medical Director, Administrator/Owner during an interview on 9/7/11 at approximately 2:30PM 		

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205.310	<p>Personnel Policies</p> <p>Each ambulatory surgical center shall have written personnel policies including job description for each staff position. There shall be documented procedure for orientation of new employees to the facility's policies and procedures as well as the personnel policies including a copy of the appropriate job description.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on a review of the facility policy and procedure manual, job descriptions and staff interview, it was determined that for 2 of 3 employees (Medical Assistant E#3 and Administrator E#9, the facility failed to have a job description for E#3 and E#9.</p> <p>Findings include</p> <p>1. On 9/6/11 at approximately 11:00AM, the policy and procedure manual was reviewed.</p>		

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205.310 cont	<p>Personnel Policies</p> <p>The manual lacked job descriptions for the Medical Assistant and Administrator.</p> <p>2. The above findings were discussed with the Owner/Administrator and Medical Director during an interview on 9/7/11 at approximately 2:20PM.</p>		

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205.330 (a)	<p>Nursing Personnel</p> <p>At least one registered professional nurse with post graduate education and experience in surgical nursing shall direct and supervise the nursing personnel and nursing care of patients and shall be on duty at all times when the patients are present.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on staff interview, it was determined that the facility failed to ensure a registered professional nurse was hired to supervise and provide patient care.</p>		

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205.330 (a) cont	<p>Nursing Personnel</p> <p>Findings include:</p> <ol style="list-style-type: none"> 1. On 9/6/11 at approximately 1:15PM, the Owner/Administrator was interviewed. The Administrator stated the facility has not had a supervising nurse since June of 2011. During surgical procedures, the Certified Nurse Anesthetist and physician supervise the surgical procedures. The facility performs approximately 10-15 cases per month. 2. The above finding was confirmed by the Medical Director during an interview on 9/7/11 at approximately 2:00PM 		

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205.330 (a)	<p>Nursing Personnel Continued</p> <p>At least one registered professional nurse with Post graduate education and experience in surgical nursing shall direct and supervise the nursing personnel and nursing care of patients...</p> <p>This requirement is not met as evidenced by:</p> <p>B. Based on clinical record review and staff interview, it was determined that for 1 of 3 patients (Pt. #10) who were RH negative, the facility Registered Nurse failed to supervise, that nursing patient care was provided by a licensed professional nurses for medication administration.</p>		

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OF FACILITY

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205.330(a)	<p>Nursing Personnel Continued</p> <p>Findings include:</p> <p>1. On 9/7/11 at approximately 12:00PM, the clinical record for Pt. #10 was reviewed. Pt. #10, a 24 year old female, was admitted on 8/13/11 for a medical abortion. The clinical record contained documentation that Pt. #10 was RH negative confirmed by laboratory testing. A Medical Assistant (E#2) documented that she administered the Rhogam.</p> <p>2. The above finding was discussed with the Owner/Administrator during an interview on 9/7/11 at approximately 12:15PM</p>		

DATE OF SURVEY 9/7/11

BY 07105
(Surveyor)

(Provider's Representative)

NOTE: IF PLV, INDICATE DATE OF PRIOR SURVEY

**ILLINOIS DEPARTMENT OF PUBLIC HEALTH
DIVISION OF HEALTH FACILITIES STANDARDS
STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION**

☒ ASTC ☐ SUB ACUTE ☐ HHA ☐ HMO ☐ HOSPICE ☐ HOSPITAL

Name OF FACILITY Women's Aid Clinic

NAME AND ADDRESS 4751 West Toughy Ave Lincolnwood, IL 60712

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.420 (a)	<p>Sanitary Facility</p> <p>The ambulatory surgical treatment center shall insure maintenance of a sanitary facility with all equipment in good working order.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on observation and staff interview, it was determined that for 4 of 4 rooms inspected (OR#1, exam room #1, recovery room and laboratory), the facility failed to ensure a sanitary environment and maintained supplies to prevent potential contamination.</p> <p>Findings include:</p> <p>1. On 9/6/11 at approximately 9:15AM, the facility was toured and the following was observed:</p> <p>*OR #1 (last used on 9/3/11) contained rust on the base of the surgical table, suction machine and stool. The baseboard near the hand washing sink was damaged.</p>		

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NAME AND ADDRESS OF FACILITY Women's Aid Clinic West Toughy Ave Lincolnwood, IL 60712

LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.420 (a) cont	<p>Sanitary</p> <p>*The suction machine in OR #1 contained clear water with specks of floating debris. Three stacks of gauze, out of the original package, was observed on a table. Five (5) insulin syringes were out of the protective packages. The anesthesia cart was dusty including the 4 drawers that contained medications. The blades of a floor fan had an accumulation of black substance.</p> <p>*The recovery room (RR) contained 5 beds and 2 recovery chairs. Five (5) of 5 recovery beds were rusty. The suction machine was observed with dust. The medication drawer in the RR contained a box of saltine crackers. Nine (9) medication cups, identified as containing Motrin and 10 medication cups containing Tylenol contained crumbs.</p>		

DATE OF SURVEY 9/7/11 BY 07105 (Surveyor) _____ (Provider's Representative)

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205.420 (a) Cont	<p>Sanitary</p> <p>*The Recovery Room technician (E#1) was observed on 9/6/11 at approximately 9:20AM, retrieving a paper towel from a garbage receptacle and using the same paper towel to cover a tray that would serve food items to patients.</p> <p>*The exam room contained 6 speculums and 20 pipettes that were out of the protective package. A rip in the exam table was covered with clear tape.</p> <p>*Two boxes of "Nova Rings" (contraceptive medication) were stored in the RR refrigerator with a liter of cola.</p>		

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205.420 (a) cont	<p>*The biohazard laboratory refrigerator contained 8 products of conception (tissue). The same refrigerator also contained medications and 3 frozen TV dinners.</p> <p>2.The above findings were confirmed with the Owner/Administrator during an interview on 9/6/11 at approximately 10:00AM.</p>		

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LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.510 (a)	<p>Emergency Care</p> <p>Each facility shall have a written plan of procedure to be followed in case of explosion or non-medical emergency. The plan shall specify persons to be notified and actions to be taken and shall be known by all staff of the facility.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on review of facility policy and procedure manual and staff interview, it was determined that emergency plan did not cover all emergencies (explosion-Bomb threat) and other non- medical emergencies.</p> <p>Findings include:</p> <ol style="list-style-type: none"> 1. On 9/7/11 at approximately 11:00AM, the policy and procedure manual was reviewed. The manual approval date 1/2011 lacked a procedure for 		

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205.510 (a) cont	<p style="text-align: center;">Emergency Care</p> <p>Explosion (bomb threat) and other non-medical emergencies.</p> <p>2.The above finding was confirmed by the Owner/Administrator during an interview on 9/7/11 at approximately 12:00PM.</p>		

DATE OF SURVEY 9/7/11 BY 07105 (Surveyor) _____ (Provider's Representative)

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205.510 (b)	<p>Emergency Care</p> <p>Each facility shall be prepared to manage those emergencies which may be associated with procedures performed there.</p> <p>This requirement is not met as evidenced by:</p> <p>A. Based on observation, review of Facility policy, and staff interview, it was determined that for 1 of 1 anesthesia cart and 1 of 1 recovery room medication cart observed, the Facility failed to ensure that emergency supplies were not outdated.</p> <p>Findings include:</p> <p>1. On 9/6/11 at approximately 9:15AM, the Facility was toured.</p>		

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205.510 (b) cont	<p style="text-align: center;">Emergency</p> <p>The anesthesia cart in OR #1 contained 1 Fentanyl 50 cc vial with a torn label thus obscuring the expiration date. (3) vials of Ketamine, (3) vials of Dexamethasine 5cc, (2) 2% lidocain contained an expiration date of 2/2011. Approximately 20 vials of Gentamycin contained an expiration date of 2/20/10.</p> <p>The Recovery Room crash cart contained (3) 500cc bags of .9 normal saline with an expiration date of June 2010.</p> <p>The decontamination room contained (2) bottles of Ferric Sulfate with an expiration date of 7/2010.</p>		

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205.510 (b) cont	Emergency The exam room contained approximately 20 culture swabs (genprobe) with an expiration date of 2/2011. 2. The above findings were confirmed with the Owner/Administrator during an interview on 9/6/11 at approximately 9:30AM		

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LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.520 (f)	<p><u>Emergency Care</u></p> <p>Surgical procedures shall not be performed on Patient's having medical, surgical, or psychiatric Conditions or complications as specified by the Consulting committee in the facility's written Policies.</p> <p>A. Based on clinical record, Facility's policy reviews and staff interview, it was determine that for 1 of 1 Patient (Pt.#1), the facility's Consulting Committee failed to developed written policies on Medical, surgical, or psychiatric conditions to indicate which patients were ineligible for a surgical procedure.</p>		

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(Surveyor)

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205.520 (f) (cont.)	<p style="text-align: center;">Emergency Care</p> <p>Findings include:</p> <p>1. The clinical record of Pt. #1 was reviewed on 9/6/11 at 10:00 AM. The record indicated that Pt. #1 was a 18 yrs old female who came with her mother to the Facility for a surgical Procedure on 5/2/09. On 5/2/09, Pt.#1 was seen by an MD E#4) who documented that "Pt.#1 and mother are" reluctant to leave the Clinic after being turned down by the Anesthesiologist. Patient is directed to be treated For enlarged Tonsils and Adenoids accompanying Upper respiratory infection. Patient states she is Taking antibiotics."</p> <p>2. On 5/2/09, E#4 documented in the clinical record that Pt.#1, was Gravida 3Para 2 at 12 weeks gestation and had an upper respiration infection for 2 weeks and "oropharynx-aveola severely enlarged</p>		

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205.520 (f) (cont.)	<p style="text-align: center;">Emergency Care</p> <p>'beefy red' tonsils and adenoids which are bulging" E#4 asked Pt.#1 which antibiotics she was taking and E#1 stated that she was not taking any antibiotics. Pt.#1 mother also stated that Pt.#1 was previously advised that adenoidectomy and tonsillectomy may be needed. Pt. #1 was also told by E#4 that it was not safe "for her to go to sleep today." When Pt.#1 asked about local anesthesia, E#4 stated that local "is not safe and advised that she could not safely have the procedure until her upper respiratory infection had been treated with antibiotics and evaluated by an internist or a family physician. Per E#4, Pt.#1 and mother agreed to go for treatment and return for reevaluation and the procedure on 5/8/09</p>		

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205.520 (f) (cont.)	<p style="text-align: center;">Emergency Care</p> <p>3. Pt.#1's clinical record reviewed on 9/6/11 also documented that Pt.#1 returned to the clinic on 5/8/09 for the surgical procedure and completed a self-administered Medical History form which indicated that Pt.#1 "bruise easily, and snore when asleep." There was no documentation in the clinical record on 5/8/09, the day of the surgical procedure, that Pt.#1 was re-evaluated for upper respiratory infection or had been seen or treated by a physician prior to the surgical procedure. Clinical documentation post surgery indicated that Pt.#1 experienced respiratory complication and was transferred to a hospital where she later died.</p>		

DATE OF SURVEY 9/7/11 BY 26287 (Surveyor) (Provider's Representative)

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205.520 (f) (cont.)	<p style="text-align: center;">Emergency Care</p> <p>4. The Facility's "Admission Criteria" Policy reviewed on 9/6/11 at 11:00 AM required, "Pt. must be in good health and free from disease" The policy failed to specify medical, surgical or psychiatric conditions or complications that would indicate a patient was ineligible for the surgical procedure. The record also indicated that there was no documentation of Pt.#1 being reevaluated or treated for the upper respiratory infection.</p> <p>5. The above findings were confirmed with The Medical Director and the Owner// Administrator of the Facility on 9/7/11 at 2:00 PM</p>		

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<p>205.530 e)</p>	<p>A registered Nurse, qualified by training and experience in operating room nursing, shall be present in the operating room and function as the circulating nurse during all invasive or operative procedures requiring aseptic technique.</p> <p>Findings include:</p> <ol style="list-style-type: none"> 1. On 9/6/11 at approximately 1:15PM, the Owner/Administrator was interviewed. The Administrator stated the facility has not had a supervising nurse since June of 2011. During surgical procedures, the Certified Nurse Anesthetist and physician supervise the surgical procedures. There was no registered nurse in the procedure room functioning as the circulating nurse during the procedure. 2. The above finding was confirmed by the Medical Director during an interview on 9/7/11 at approximately 2:00PM 		
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LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.540 (c)	<p>Postoperative Care</p> <p>Patients in whom a complication is known or suspected to have occurred during or after the performance of a surgical procedure, shall be informed of such condition and arrangements made for treatment of the complication. In the event of admission to an inpatient facility, summary of care given in the ambulatory surgical treatment center concerning the suspected complication shall accompany the patient.</p> <p>A. Based on clinical record, Facility's Medical Emergency Policy reviews and staff interview, it was determined that for 1 of 1 patient (Pt.#1) who died after the performance of a surgical procedure, the facility failed to initiate and performed CPR in accordance with Facility's policy.</p> <p>Findings include:</p>		

DATE OF SURVEY 9/7/11

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(Surveyor)

(Provider's Representative)

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205.540 (c) (Cont.)	<p style="text-align: center;">Post Operative Care</p> <p>1. The clinical record of Pt.#1 was reviewed on 9/6/11 at 1:00 PM. Pt.#1 was an 18 yr old female who was admitted to the facility for a surgical procedure on 5/8/09. After the surgical procedure, Pt.#1 began to experienced difficulty breathing and bleeding from the nose and mouth. There was no CPR administered, instead, the patient was given a white bag and told to breath into it by a staff member. The patient was eventually transferred to a hospital and later died.</p> <p>2. The Facility's Medical Emergency Policy was Reviewed on 9/6/11 at 2:00 PM. The policy States, "In case of a medical emergency, CPR will be Administered....."</p>		

DATE OF SURVEY 9/7/11 BY 26287 (Surveyor) _____ (Provider's Representative)

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205.540 (c) (Cont.)	<p style="text-align: center;">Post Operative Care</p> <p>3. The findings was confirmed with the Facility's Owner/Administrator and the Medical Director on 9/7/11 at 2:30 PM</p>		

DATE OF SURVEY 9/7/11

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LIST RULE VIOLATED	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG	PROVIDER'S PLAN OF CORRECTION AND DATE TO BE COMPLETED	COMPLETION DATE
205.610 (a)(c)(i)(m)(o)	<p>Clinical Records</p> <p>Accurate and complete clinical records shall be maintained for each patient and all entries in the clinical record shall be made at the time surgical procedure is performed and when care, treatment, medications, or other services are given. The record shall include, but not limited to the following: patient identification...pre-counseling notes...operative record...condition at the time of discharge, notes..post counseling notes.</p> <p>This requirement is not met as evidenced by:</p> <p>Findings include:</p> <p>A. Based on Facility's policy review, policy and procedure manual review, clinical record review, and interview, it was determined that the Facility failed to ensure for 5 of 11 clinical records reviewed (Pts#2,4,6,9,11) the records contained patient's identification, pre-counseling notes, condition at discharge, operative records, and post counseling notes.</p>		

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205.610 (a)(c)(i)(m)(o) cont.	<p style="text-align: center;">Clinical Records</p> <ol style="list-style-type: none"> On 9/6/11 at approximately 10:00AM, the policy and procedure manual was reviewed. The manual lacked policy and procedures for patient identification, pre-counseling notes, conditions at discharge, operative record, and post counseling notes. On 9/6/11 at approximately 10:35AM, the clinical record of Pt#2 was reviewed. Pt#2, a 42 year old female, had a surgical procedure on 1/4/11. The clinical record lacked: patient identification, pre-counseling note, operative record, condition at discharge, and post counseling notes. On 9/6/11 at 10:45AM the clinical record of Pt#4 was reviewed. Pt#4, a 21 year old female, had a surgical procedure on 1/5/11. The clinical record lacked: patient identification, pre-counseling notes, operative record, condition at discharge, and post counseling notes. 	

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205.610 (a)(c)(i)(m)(o) cont.	<p style="text-align: center;">Clinical Records</p> <p>4. On 9/6/11 at approximately 11:00AM, the clinical record of Pt#6 was reviewed. Pt#6, a 20 year old female, had a surgical procedure on 3/1/11. The clinical record lacked: patient identification, pre-counseling notes, operative record, condition at the time discharge, and post counseling notes.</p> <p>5. On 9/6/11 at approximately 1:00PM the clinical record of Pt#9 was reviewed. Pt#9, a 26 year old female had a surgical procedure on 6/11/11. The clinical record lacked: patient identification, pre-counseling notes, operative record, condition at the time discharge, and post counseling notes.</p> <p>6. On 9/7/11 at approximately 10:00AM the clinical record of Pt#11 was reviewed. Pt#11, a 32 year old female, had a surgical procedure on 1/4/11. The clinical record lacked: pre and, post counseling notes.</p>		

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OF FACILITY

VIOLATED LIST RULE	ENTER SUMMARY OF REQUIREMENT AND SPECIFICALLY WHAT IS WRONG		COMPLETION DATE
205.610(a)(c)(i)(m) (o) cont.	<p style="text-align: center;">Clinical Records</p> <p>7. The above findings were confirmed with the Medical Director./Owner/Administrator of the facility during an interview on 9/7/11 at approximately 2:00PM.</p>		

DATE OF SURVEY 9/7/11

BY 07105
(Surveyor)

(Provider's Representative)

NOTE: IF PLV, INDICATE DATE OF PRIOR SURVEY _____

4

ILLINOIS DEPARTMENT OF PUBLIC HEALTH

DEPARTMENT OF PUBLIC HEALTH
STATE OF ILLINOIS

THE DEPARTMENT OF PUBLIC HEALTH,
STATE OF ILLINOIS,

Complainant,

v.

THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.,

Respondent.

Docket No. PTC 11-003

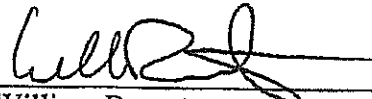
PROOF OF SERVICE

The undersigned certifies that a true and correct copy of the attached NOTICE OF EMERGENCY SUMMARY SUSPENSION, NOTICE OF FINE ASSESSMENT, AND NOTICE OF OPPORTUNITY FOR HEARING was sent by certified US mail and regular US mail in a sealed envelope, postage prepaid, to:

Mark Glickman
Registered Agent
3100 Dundee Road Suite 402
Northbrook, Illinois 60062

Larissa Rowansky
Administrator
4751 W. Touhy Avenue
Lincolnwood, Illinois 60712

That said document was deposited in the United States Post Office at Springfield, Illinois, on the 21st day of October, 2011.



William Bryant
Illinois Department of Public Health

DEPARTMENT OF PUBLIC HEALTH
STATE OF ILLINOIS

THE DEPARTMENT OF PUBLIC HEALTH,
STATE OF ILLINOIS,

Complainant,

v.

THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.,

Respondent.

Docket No. PTC 11-003

NOTICE OF EMERGENCY SUMMARY SUSPENSION,
NOTICE OF FINE ASSESSMENT
AND NOTICE OF OPPORTUNITY FOR HEARING

Pursuant to the authority granted to the Department of Public Health (hereinafter "Department") by the Ambulatory Surgical Treatment Center Act (hereinafter "Act"), 210 ILCS 5/1 *et seq.* NOTICE IS HEREBY GIVEN:

NOTICE OF EMERGENCY SUMMARY SUSPENSION

In accordance with Sections 5/10f and 5/10d of the Act, Section 205.840 of the Ambulatory Surgical Treatment Center Licensing Requirements Code (77 Ill. Admin. Code 205) (the "Code"), and Section 10-65(d) of the Illinois Administrative Procedure Act (5 ILCS 100/1-5 *et seq.*) (the "APA"), incorporated into the Act at 210 ILCS 5/10a, the Department issues this Notice of Summary Suspension and hereby orders the suspension of the license for the operation of the facility known as Women's Aid Clinic, Department license number 7001647, located at 4751 West Touhy Avenue, Lincolnwood, Illinois, 60712 (the "facility"). **The license suspension shall commence immediately and shall continue indefinitely.**

FINDINGS OF NONCOMPLIANCE

The Department has found conditions in the Respondent facility that are directly threatening to the public interest, health, safety and welfare requiring immediate, emergency action. (210 ILCS 10f). The conditions in the facility directly threatening to the public interest, health, safety and welfare include, but are not limited to, a substantial or continued failure to comply with the Act or any rule promulgated thereunder as referenced below and in the attached exhibits, and violations of the provisions of the Act and the rules promulgated thereunder. These conditions and failure to comply with both the Act and the Code have resulted in the facility's inability to meet the public interest, health, safety and welfare needs of the community.

Department staff commenced a licensure survey of the facility on September 6, 2011 through September 7, 2011. (the "September 2011 survey"). During the September 2011 survey, the

Department observed conditions existing in the facility that threaten the public interest, health, safety and welfare. These conditions include, but are not limited to:

- The facility's failure to develop written policies on medical, surgical, or psychiatric conditions to indicate which patients were ineligible for a surgical procedure (77 Ill. Admin. Code 205.520(f));
- The facility's failure to initiate and perform CPR in accordance with the Facility's policy for a patient who died after the performance of a surgical procedure (77 Ill. Admin. Code 205.540(c));
- The facility's failure to hire a registered professional nurse to supervise and provide patient care (77 Ill. Admin. Code 205.330(a));
- The facility's failure to ensure that a registered nurse supervised the administration of medication in order to ensure that medications were provided by personnel licensed for medication administration (77 Ill. Admin. Code 205.330(a));
- The facility's failure to ensure a sanitary environment in operating rooms, examination rooms, recovery rooms and the laboratory (77 Ill. Admin. Code 205.420(a));
- The facility's failure to ensure that a registered nurse, who is qualified by training and experience in operating room nursing, is present in the operating room and functioning as the circulating nurse during all invasive or operative procedures (77 Ill. Admin. Code 205.530(e)).

The findings from the September 2011 survey are hereby incorporated into this "Notice of Emergency License Suspension" and are more fully set forth in the Statement of Deficiencies. (A copy of the September 2011 Statement of Deficiencies is attached hereto as Exhibit "A").

These conditions constitute a substantial or continued failure on the part of the facility to comply with the Act and with the rules and regulations promulgated under the Act. The condition of the facility has deteriorated to a point where "the public interest, health, safety, or welfare imperatively requires" that the facility's license be suspended on an emergency basis. (210 ILCS 5/10f(c)).

NOTICE OF FINE ASSESSMENT

Pursuant to Section 5/10d of the Act and Section 205.850 of the Code, the Department hereby assesses a fine of \$200/day for the following violations (as set forth more fully above and in the attached exhibits):

Violation of 77 Ill. Admin. Code 205.330(a):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.420(a):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.520(f):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.530(e):

(9-7-11 to 10-21-11) 45 days x \$200/day = \$9,000.00

TOTAL FINE:

\$36,000.00

NOTICE OF OPPORTUNITY FOR HEARING


The licensee has a right to a hearing to contest this action pursuant to, without limitation, Section(s) 5/10c, 5/10f, and 5/10g of the Act and Section 205.860 of the Code. A written request for hearing must be sent within ten (10) days of receipt of this Notice. Such request for a hearing must be sent to the Illinois Department of Public Health, Division of Health Facilities Standards, 525 West Jefferson Street, Fifth Floor, Springfield Illinois 62761. 10/21

**FAILURE TO REQUEST THE HEARING AS SPECIFIED HEREIN
SHALL CONSTITUTE A WAIVER OF THE RIGHT TO SUCH HEARING.**

ANSWER BY RESPONDENT

In accordance with Section 100.7(d) of the Department's Rules of Practice and Procedure in Administrative Hearings (77 Ill. Admin. Code 100), a copy of which is enclosed, the Respondent shall file a written answer to the Allegations of Noncompliance, within twenty (20) days after receiving this Notice. Such answer must be sent to the Illinois Department of Public Health, Division of Health Facilities Standards, 525 West Jefferson Street, Fifth Floor, Springfield Illinois 62761. 11/10

**FAILURE TO FILE AN ANSWER WITHIN TWENTY (20) DAYS
OF THE RECEIPT OF THIS NOTICE SHALL CONSTITUTE
RESPONDENT'S ADMISSION OF THE ALLEGATIONS OF NONCOMPLIANCE**


Craig Conover, M.D., M.P.H. *MD MPH*
Acting Director
Illinois Department of Public Health

Dated this 21 day of October, 2011.

Nov. 5, 2011,

Ms.Byerley,

Assistant General Counsel

Dear Ms.Byerley,

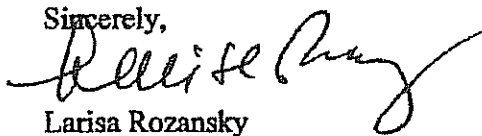
I am sorry to inform you, that after 21 years in business, Women's Aid Clinic, IDPH LIC. NO. 7001647 will be closing as of November 10, 2011.

As an Administrator of the Women's Aid Clinic, I disagree with the Noncompliance Findings from the licensure survey of the Facility by the department staff, which ended on September 7, 2011. One of the conditions was due to "the facility's failure to perform CPR for a patient who died after a surgical procedure". The paramedics initiated a CPR at the Facility before the patient was transferred to St. Francis hospital. CPR was not needed before paramedics arrived.

I requested a hearing before but I do not need it anymore as of today, due to the closing On November 10, 2011.

If you have any questions regarding this letter, please contact me at (847) 676-2428.

Sincerely,

A handwritten signature in black ink, appearing to read "Larisa Rozansky", written over the printed name.

Larisa Rozansky

Women's Aid Clinic

THE DEPARTMENT OF PUBLIC
HEALTH, STATE OF ILLINOIS,

Complainant,

vs.

THE WOMEN'S AID CLINIC
OF LINCOLNWOOD,
(License #7001647)

Respondent.

Docket No. PTC 11-003

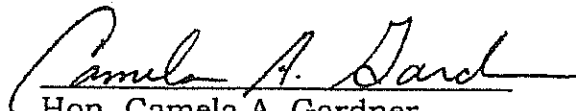
ADMINISTRATIVE LAW JUDGE'S REPORT AND RECOMMENDATION

On November 5, 2011, the Respondent, Larisa Rozansky, the administrator of the, Women's Aid Clinic, (IDPH License # 7001647) submitted a request to withdraw her request for hearing attached hereto and made a part of the record. In support of its request to withdraw, the Respondent reported that a hearing is not longer necessary as the facility is scheduled to close effective November 10, 2011.

Therefore, based Respondent's voluntary request to withdraw

IT IS HEREBY RECOMMENDED:

That this matter be dismissed.



Hon. Camela A. Gardner
Administrative Law Judge
Illinois Department of Public Health

Entered this 28th day of December, 2011.

THE DEPARTMENT OF PUBLIC
HEALTH, STATE OF ILLINOIS,

Complainant,

vs.

THE WOMEN'S AID CLINIC
OF LINCOLNWOOD,
(License #7001647)

Respondent.

Docket No. PTC 11-003

FINAL ORDER

This cause is dismissed in that the Complainant, prior to the administrative hearing, has withdrawn his hearing request in this matter attached here to and made a part hereof.

The Director of the Illinois Department of Public Health has delegated to the undersigned the authority to issue a final order. The undersigned, after careful review and consideration of the entire record of these proceedings, adopts the recommendation of the Administrative Law Judge, attached hereto and made a part hereof.

This order is a final administrative decision within the provisions of the Ambulatory and Surgical Treatment Center Act, the Administrative Procedures Act and the Rules of Practice and Procedure in Administrative Hearings. Any petition for judicial review of this decision shall be filed within 15 days after receipt of the final agency determination.



Teresa Garate, Ph.D.
Assistant Director
Office of the Director
Illinois Department of Public Health

Dated this 12 day of Jan, ²⁰¹²~~2011~~.

STATE OF ILLINOIS

Respondent.

Docket No. PTC 11-003

That said document was deposited in the United States Post Office at Chicago, Illinois, on the 3/5th day of January 2012.

cc: Eva Byerley
File

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

ANTHONY ROSS, as Special Administrator of the)
Estate of ANTONESHA ROSS, deceased)

Plaintiff,)

vs.)

No.)

THE WOMEN'S AID CLINIC OF)
LINCOLNWOOD, INC., a corporation;)
JOSEPHINE KAMPER, M.D.,)

Individually and as Agent of The Women's)
Aid Clinic of Lincolnwood, Inc. a corporation;)
LAWRENCE HILL, CRNA,)
Individually and as Agent of The Women's)
Aid Clinic of Lincolnwood, Inc. a corporation;)

Defendants.)

2009L007351
JURY DEMAND
CLERK/ROOM F
TIME 00:00
Medical Malpractice

COMPLAINT AT LAW

COUNT I

**(Wrongful Death—The Women's Aid Clinic of Lincolnwood, Inc.
by and through its employees and/or agents,
Josephine Kamper, M.D. and Lawrence Hill, CRNA)**

NOW COMES Plaintiff, ANTHONY ROSS, as Special Administrator of the estate of ANTONESHA ROSS, Deceased, by and through his attorneys, POWER ROGERS & SMITH, P.C., hereby complaining of Defendants, THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC., by and through its employees and/or agents, Josephine Kamper, M.D. and Lawrence Hill, CRNA,; JOSEPHINE KAMPER, M.D., Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., a corporation; and LAWRENCE HILL, CRNA, Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., a corporation, pleading hypothetically and in the alternative, state as follows:

1. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc. was a corporation doing business in the State of Illinois.
2. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc, was licenced by the State of Illinois as a medical clinic.
3. That on or about May 2, 2009 through May 8, 2009 Josephine Kamper, M.D. was a physician licensed in the State of Illinois.
4. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill was a certified registered nurse anesthetist licensed by the State of Illinois.
5. That on or about May 2, 2009 through May 8, 2009 Josephine Kamper, M.D. was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.
6. That on or about May 2, 2009 through May 8, 2009 and at all times material, Josephine Kamper, M.D. was acting within the scope of her employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
7. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill, was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.
8. That on or about May 2, 2009 through May 8, 2009 and at all times material, Lawrence Hill was acting within the scope of his employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
9. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was seen as a patient at Women's Aid Clinic of Lincolnwood, Inc.
10. That on or about May 2, 2009 Plaintiff's decedent, Antonehsa Ross, was treated by Josephine Kamper, M.D. at Women's Aid Clinic of Lincolnwood, Inc.
11. That on or about May 2, 2009, Plaintiff's decedent, Antonehsa Ross, had an

ultrasound taken of her abdomen at Women's Aid Clinic of Lincolnwood, Inc.

12. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was pregnant.
13. That on or about May 2, 2009 and at all times material, Plaintiff's decedent, Antonesha Ross, paid a down payment to Women's Aid Clinic of Lincolnwood, Inc. for services to have her pregnancy terminated.
14. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was told that she was 13 weeks pregnant Women's Aid Clinic of Lincolnwood, Inc.
15. That on or about May 2, 2009 Plaintiff's decedent, Antonehsa Ross, was told that the balance to be paid for services to be rendered on May 8, 2009 was \$390.00 to terminate her pregnancy.
16. That on or about May 8, 2009 Plaintiff's decedent, Antonesha Ross, returned to Women's Aid Clinic of Lincolnwood, Inc.
17. That on or about May 8, 2009 Plaintiff's decedent, Antonesha Ross, was treated by Josephine Kamper, M.D.
18. That on or about May 8, 2009 Kamper performed a procedure to terminate the pregnancy of Plaintiff's decedent, Antonesha Ross.
19. That on or about May 8, 2009 Lawrence Hill provided anesthesia services to decedent, Antonesha Ross.
20. That on or about May 8, 2009 while anesthesia services were being provided by Lawrence Hill to Plaintiff's decedent, Antonesha Ross, her blood oxygen levels were determined to be abnormal.
21. That on or about May 8, 2009 while Lawrence Hill was providing anesthesia

services to Plaintiff's decedent, Antonesha Ross, her blood oxygen saturations were determined to be in the 80s to 90 range.

22. That on or about May 8, 2009, while Lawrence Hill was providing anesthesia services to Plaintiff's decedent, Antonesha Ross, she was coughing up blood through her mouth and nose.
23. That an employee of Women's Aid Clinic of Lincolnwood, Inc. gave Plaintiff's decedent, Antonesha Ross, a bag to breath into.
24. That on or about May 8, 2009, Plaintiff's decedent, Antonesha Ross, suffered a respiratory and cardiac arrest.
25. That on or about May 8, 2009 and at all times material, defendants, Women's Aid Clinic of Lincolnwood, Inc., Josephine Kamper and Lawrence Hill were negligent in one or more of the following ways:
 - a. failing to properly monitor the blood oxygen levels of Antonehsa Ross; or
 - b. failing to provide adequate oxygenation for Antonehsa Ross; or
 - c. failing to maintain a patent airway for Antonehsa Ross; or
 - d. giving Antonesha Ross a bag to breath into; or
 - e. failing to properly resuscitate Antonehsa Ross; or
 - f. was otherwise negligent in the care and treatment of Antonehsa Ross.
26. That as a proximate result of one or more of the foregoing negligent acts and/or omissions, Antonehsa Ross, was injured and later died.
27. That Antonehsa Ross left surviving her two minor children: Antonio Hooper, dob, 9/6/07; and Antwane Hooper, dob, 10/27/08.
28. That Anthony Ross has been appointed Special Administrator of the Estate of Antonehsa Ross, deceased and brings this cause of action on behalf of the Estate of the decedent pursuant to 740 ILCS 180/1, commonly known as the Wrongful Death Act of Illinois.

WHEREFORE, the Plaintiff, ANTHONY ROSS, as Special Administrator of the Estate of ANTONESHA ROSS, by and through his attorneys, POWER ROGERS & SMITH, P.C., demands judgment against, defendants, THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC., by and through its employees and/or agents, Josephine Kamper, M.D. and Lawrence Hill, CRNA,; JOSEPHINE KAMPER, M.D., Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., a corporation; and LAWRENCE HILL, CRNA, Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., and each of them, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) as shall represent fair and just compensation.

COUNT II

**Survival—The Women's Aid Clinic of Lincolnwood, Inc.
by and through its employees and/or agents,
Josephine Kamper, M.D. and Lawrence Hill, CRNA)**

NOW COMES Plaintiff, ANTHONY ROSS, as Special Administrator of the estate of ANTONESHA ROSS, Deceased, by and through his attorneys, POWER ROGERS & SMITH, P.C., hereby complaining of Defendants, THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC., by and through its employees and/or agents, Josephine Kamper, M.D. and Lawrence Hill, CRNA,; JOSEPHINE KAMPER, M.D., Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., a corporation; and LAWRENCE HILL, CRNA, Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., pleading hypothetically and in the alternative, state as follows:

1. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc. was a corporation doing business in the State of Illinois.

2. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc, was licenced by the State of Illinois as a medical clinic.
3. That on or about May 2, 2009 through May 8, 2009 Josephine Kamper, M.D. was a physician licensed in the State of Illinois.
4. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill was a certified registered nurse anesthetist licensed by the State of Illinois.
5. That on or about May 2, 2009 through May 8, 2009 Josephine Kamper, M.D. was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.
6. That on or about May 2, 2009 through May 8, 2009 and at all times material, Josephine Kamper, M.D. was acting within the scope of her employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
7. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill, was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.
8. That on or about May 2, 2009 through May 8, 2009 and at all times material, Lawrence Hill was acting within the scope of his employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
9. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was seen as a patient at Women's Aid Clinic of Lincolnwood, Inc.
10. That on or about May 2, 2009 Plaintiff's decedent, Antonehsa Ross, was treated by Josephine Kamper, M.D. at Women's Aid Clinic of Lincolnwood, Inc.
11. That on or about May 2, 2009, Plaintiff's decedent, Antonehsa Ross, had an ultrasound taken of her abdomen at Women's Aid Clinic of Lincolnwood, Inc.
12. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was

pregnant.

13. That on or about May 2, 2009 and at all times material, Plaintiff's decedent, Antonesha Ross, paid a down payment to Women's Aid Clinic of Lincolnwood, Inc. for services to have her pregnancy terminated.
14. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was told that she was 13 weeks pregnant Women's Aid Clinic of Lincolnwood, Inc.
15. That on or about May 2, 2009 Plaintiff's decedent, Antonehsa Ross, was told that the balance to be paid for services to be rendered on May 8, 2009 was \$390.00 to terminate her pregnancy.
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17. That on or about May 8, 2009 Plaintiff's decedent, Antonesha Ross, was treated by Josephine Kamper, M.D.
18. That on or about May 8, 2009 Kamper performed a procedure to terminate the pregnancy of Plaintiff's decedent, Antonesha Ross.
19. That on or about May 8, 2009 Lawrence Hill provided anesthesia services to decedent, Antonesha Ross.
20. That on or about May 8, 2009 while anesthesia services were being provided by Lawrence Hill to Plaintiff's decedent, Antonesha Ross, her blood oxygen levels were determined to be abnormal.
21. That on or about May 8, 2009 while Lawrence Hill was providing anesthesia services to Plaintiff's decedent, Antonesha Ross, her blood oxygen saturations were determined to be in the 80s to 90 range.

22. That on or about May 8, 2009, while Lawrence Hill was providing anesthesia services to Plaintiff's decedent, Antonesha Ross, she was coughing up blood through her mouth and nose.
23. That an employee of Women's Aid Clinic of Lincolnwood, Inc. gave Plaintiff's decedent, Antonesha Ross, a bag to breath into.
24. That on or about May 8, 2009, Plaintiff's decedent, Antonesha Ross, suffered a respiratory and cardiac arrest.
25. That on or about May 8, 2009 and at all times material, defendants, Women's Aid Clinic of Lincolnwood, Inc., Josephine Kamper and Lawrence Hill were negligent in one or more of the following ways:
- a. failing to properly monitor the blood oxygen levels of Antonehsa Ross; or
 - b. failing to provide adequate oxygenation for Antonehsa Ross; or
 - c. failing to maintain a patent airway for Antonehsa Ross; or
 - d. giving Antonesha Ross a bag to breath into; or
 - e. failing to properly resuscitate Antonehsa Ross; or
 - f. was otherwise negligent in the care and treatment of Antonehsa Ross.
26. That as a proximate result of one or more of the foregoing negligent acts and/or omissions, Antonehsa Ross, was injured and later died.
27. As a proximate result of the foregoing conditions, Antonesha Ross, endured pain and suffering, disability and disfigurement, prior to her death on May 8, 2009.
28. That had she survived, ANTONESHA ROSS would have been entitled to bring an action for injuries she suffered and said action has survived her death, pursuant to 755 ILCS 5/27-6, commonly known as the Survival Act.

WHEREFORE, the Plaintiff, ANTHONY ROSS, as Special Administrator of the Estate of ANTONESHA ROSS, by and through his attorneys, POWER ROGERS & SMITH, P.C., demands judgment against, defendants, THE WOMEN'S AID CLINIC OF

LINCOLNWOOD, INC., by and through its employees and/or agents, Josephine Kamper, M.D. and Lawrence Hill, CRNA,; JOSEPHINE KAMPER, M.D., Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., a corporation; and LAWRENCE HILL, CRNA, Individually and as agent of the Women's Aid Clinic of Lincolnwood, Inc., and each of them, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) as shall represent fair and just compensation.

COUNT III
Institutional Negligence—Women's Aid Clinic of Lincolnwood, Inc.

NOW COMES Plaintiff, ANTHONY ROSS, as Special Administrator of the estate of ANTONESHA ROSS, Deceased, by and through his attorneys, POWER ROGERS & SMITH, P.C., hereby complaining of Defendant, THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC., pleading hypothetically and in the alternative, state as follows:

1. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc. was a corporation doing business in the State of Illinois.
2. That on or about May 2, 2009 through May 8, 2009 Women's Aid Clinic of Lincolnwood, Inc, was licenced by the State of Illinois as a medical clinic.
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4. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill was a certified registered nurse anesthetist licensed by the State of Illinois.
5. That on or about May 2, 2009 through May 8, 2009 Josephine Kamper, M.D. was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.

6. That on or about May 2, 2009 through May 8, 2009 and at all times material, Josephine Kamper, M.D. was acting within the scope of her employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
7. That on or about May 2, 2009 through May 8, 2009 Lawrence Hill, was an agent and/or employee of Women's Aid Clinic of Lincolnwood, Inc.
8. That on or about May 2, 2009 through May 8, 2009 and at all times material, Lawrence Hill was acting within the scope of his employment and/or agency with Women's Aid Clinic of Lincolnwood, Inc.
9. That on or about May 2, 2009 Plaintiff's decedent, Antonesha Ross, was seen as a patient at Women's Aid Clinic of Lincolnwood, Inc.
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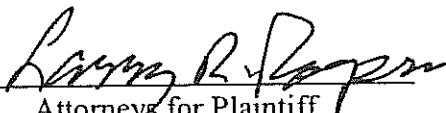
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19. That on or about May 8, 2009 Lawrence Hill provided anesthesia services to decedent, Antonesha Ross.
20. That on or about May 8, 2009 while anesthesia services were being provided by Lawrence Hill to Plaintiff's decedent, Antonesha Ross, her blood oxygen levels were determined to be abnormal.
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22. That on or about May 8, 2009, while Lawrence Hill was providing anesthesia services to Plaintiff's decedent, Antonesha Ross, she was coughing up blood through her mouth and nose.
23. That an employee of Women's Aid Clinic of Lincolnwood, Inc., gave Plaintiff's decedent, Antonesha Ross, a bag to breath into.
24. That on or about May 8, 2009, Plaintiff's decedent, Antonesha Ross, suffered a respiratory and cardiac arrest.
25. That on or about May 8, 2009 and at all times material, defendants, Women's Aid

Clinic of Lincolnwood, Inc., Josephine Kamper and Lawrence Hill were negligent
in one or more of the following ways:

- a. failing to provide proper emergency equipment for resuscitation purposes; or
- b. failing to provide a manual resuscitator; or
- c. failing to provide a properly working laryngoscope; or
- d. failing to provide endotracheal tubes; or
- e. failing to provide other resuscitation equipment necessary for the proper resuscitation of Plaintiff's decedent, Antonehsa Ross.

26. That as a proximate result of one or more of the foregoing negligent acts and/or omissions, Antonehsa Ross, was injured and later died.

WHEREFORE, the Plaintiff, ANTHONY ROSS, as Special Administrator of the Estate of ANTONESHA ROSS, by and through his attorneys, POWER ROGERS & SMITH, P.C., demands judgment against, defendant, Women's Aid Clinic of Lincolnwood, Inc., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) as shall represent fair and just compensation.

By: 
Attorneys for Plaintiff

Larry R. Rogers
POWER, ROGERS & SMITH, P.C.
70 West Madison Street
55th Floor
Chicago, IL 60602-4212
Phone No. 312/236-9381
Atty. No. 31444

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

ANTHONY ROSS, as Special Administrator of the)	
Estate of ANTONESHA ROSS, deceased)	
)	
Plaintiff,)	
vs.)	No.
)	
THE WOMEN'S AID CLINIC OF)	
LINCOLNWOOD, INC., a corporation;)	
JOSEPHINE KAMPER, M.D.,)	
Individually and as Agent of The Women's)	
Aid Clinic of Lincolnwood, Inc. a corporation;)	JURY DEMAND
LAWRENCE HILL, CRNA,)	
Individually and as Agent of The Women's)	
Aid Clinic of Lincolnwood, Inc. a corporation;)	
)	
Defendants.)	

AFFIDAVIT

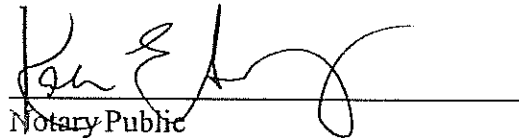
NOW comes Affiant, Larry R. Rogers, and being first duly sworn on oath,
deposes and states:

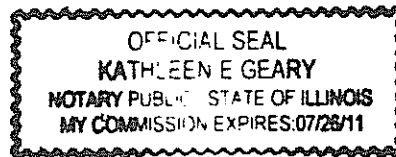
1. That he is one of the attorneys representing the Estate of Antonesha Ross,
deceased, in the above cause.
2. That he is familiar with the facts in the above cause.
3. That he has reviewed the available information relating to the money damages
in the above matter.

4. That based upon information and belief, the total money damages sought in the above cause are worth in excess of Fifty Thousand Dollars (\$50,000.00).


Larry R. Rogers

Subscribed and sworn to before me
this 23rd day of JUNE, 2009


Notary Public



POWER, ROGERS & SMITH, P.C.
70 West Madison Street—55th Floor
Chicago, IL 60602
Phone No. 312/236-9381

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

2009 JUN 23 PM 12:00
CLERK OF COURT
OF COOK COUNTY, ILL.

ANTHONY ROSS,

Petitioner,

vs.

THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.,

Respondents.

No. 09 L 5653

2009L007351
CALENDAR/ROOM F
TIME 00:00
Medical Malpractice

PETITION TO APPOINT SPECIAL ADMINISTRATOR

Petitioner, Anthony Ross, moves this Honorable Court to appoint her as Special Administrator of the Estate. In support of said motion, states:

1. Petitioner is the father of Antonesha Ross, deceased, who died on May 8, 2009
2. At the time of Antonesha Ross' death, she was survived by:

Antonio Hooper, minor, dob: 9/6/07;
Antawne Hooper, minor, dob: 10/27/08
3. The Decedent died without leaving a will.
4. No petition for letters of office has been filed.

WHEREFORE, Petitioner, Anthony Ross, requests that this Honorable Court appoint her as Special Administrator of the Estate of Antonehsa Ross, Deceased, pursuant to 740 ILCS 180/2.1.

Respectfully submitted,



Anthony Ross, Petitioner

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

ANTHONY ROSS,

Petitioner,

vs.

THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.,

Respondents.

)
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No. 09 L 5653

APPEARANCE, WAIVER OF NOTICE, AND CONSENT

I, Maria Ross, mother of Antonesha Ross , deceased, hereby appear, waive notice, and consent to the immediate appointment of Maria Ross as special Administrator of the Estate of Antonesha Ross, deceased, pursuant to 740 ILCS 180/2.1.

Maria Ross

Maria Ross

010 - No Fee Paid
1919 - Fee Paid
JURY DEMAND

CCG-67 (2-81)

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

ANTHONY ROSS, as Special Administrator of the
Estate of ANTONESHA ROSS, deceased,

Plaintiff,

v.

THE WOMEN'S AID CLINIC OF LINCOLNWOOD,
INC., a corporation; JOSEPHINE KAMPER, M.D.,
Individually and as Agent of The Women's Aid Clinic
of Lincolnwood, Inc. a corporation; LAWRENCE
HILL, CRNA, Individually and as Agent of The
Women's Aid Clinic of Lincolnwood, Inc. a
corporation,

Defendant.

NO.

2009L007351
CALENDAR/ROOM F
TIME 00:00
Medical Malpractice

JURY DEMAND

The undersigned demands a jury trial.


LARRY R. ROGERS

Name POWER ROGERS & SMITH, P.C.
LARRY R. ROGERS
Attorney for Plaintiff(s)
Address 70 West Madison Street—55th Floor
City Chicago, Illinois 60602-4212
Telephone 312-236-9381
Atty. No. 31444

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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

FILED-2

2010 SEP -2 PM 2:26

CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
LAW DIVISION

CLERK

No. 09 L 007351 "F"

MARIA ROSS, as Independent Administrator)
DBN of the Estate of ANTONESHA ROSS,)
deceased)
Plaintiff,)
vs.)
THE WOMEN'S AID CLINIC OF)
LINCOLNWOOD, INC., a corporation;)
JOSEPHINE KAMPER, M.D.,)
Individually and as Agent of The Women's)
Aid Clinic of Lincolnwood, Inc. a corporation;)
LAWRENCE HILL, CRNA,)
Individually and as Agent of The Women's)
Aid Clinic of Lincolnwood, Inc. a corporation;)
and as Agent of VANSCHOVAL, INC.,)
Defendants.)

3008
2800
3352
C.C.
E.S.

PETITION TO SETTLE WRONGFUL DEATH ACTION, FINDING OF
DEPENDENCY AND APPROVAL OF DISBURSEMENTS

Now comes the plaintiff, MARIA ROSS, as Independent Administrator DBN of the Estate of ANTONESHA ROSS, deceased, by her attorney, POWER, ROGERS & SMITH, P.C., and moves the Court for approval of settlement of the wrongful death action, a finding of dependency and approval of disbursements, and in support thereof state as follows:

1. That an offer of settlement in the above-captioned matter has been made in the amount of \$555,508.00.
2. The defendant, Lawrence Hill, CRNA and Vanscoval, Ltd. have made an offer of settlement in the amount of \$80,508.00.
3. The defendant, Women's Aid Clinic of Lincolnwood, Inc., has made an offer of settlement in the amount of \$475,000.00 payable as follows:
 - a. Immediate cash payment of Seventy-Five Thousand and 00/100 Dollars (\$75,000.00)

payable to MARIA ROSS, as Independent Administrator DBN of the Estate of ANTONESHA ROSS, deceased, and her attorneys, Power, Rogers & Smith, P.C.

b. Future periodic payments as follows:

For Antonio Hooper DOB 09/06/07

- ▶ \$35,000.00 per year, guaranteed 4 years, beginning 07/01/2026, with the last guaranteed payment on 7/1/2029 (College Plan); Guaranteed Payout \$140,000.00
- ▶ \$4,357.02 per month, guaranteed 7 years and 4 months, beginning 6/1/2030, with the last guaranteed payment on 9/1/2037 (Monthly Income after graduation until age 30); Guaranteed Payout \$383,418.00
- ▶ The cost of Annuity is \$200,000.00

For Antwane Hooper DOB 10/27/08

- ▶ \$35,000.00 per year, guaranteed 4 years, beginning 07/01/2027, with the last guaranteed payment on 7/1/2030 (College Plan); Guaranteed Payout \$140,000.00
- ▶ \$4,701.15 per month, guaranteed 7 years and 5 months, beginning 6/1/2031, with the last guaranteed payment on 10/1/2038 (Monthly Income after graduation until age 30); Guaranteed Payout \$418,402.00.
- ▶ The cost of Annuity is \$200,000.00

The total cost of the structured settlement is \$400,000.00. See Exhibit A - Settlement Agreement and Release.

4. Plaintiff agrees that the defendant, Women's Aid Clinic of Lincolnwood, Inc., and/or their insurer may make a qualified assignment within the meaning of Section 130 (c) of the Internal Revenue Code of 1986, as Amended, to make the periodic future payments as set forth in Page II; Paragraph 4 of the Addendum to Release (Exhibit A) to New York Life Insurance and Annuity Corporation. The New York Life Insurance and Annuity Corporation reserves the right to fund the liability to make its periodic payments described in Page II ; Para 6 of Addendum to Release above through the purchase of an annuity policy from New York Life Insurance Company. New

York Life Insurance Company has the following ratings: AM BEST A++.

5. All sums set forth in Paragraphs 3(a) and 3(b) above constitute damages on account of personal injury, within the meaning of Section 104 (a)(2) of the Internal Revenue Code of 1986, as amended.

6. Larry R. Rogers has conferred with Maria Ross concerning the offer of settlement and she has agreed that the offer of settlement is fair and reasonable and should be accepted.

7. Power Rogers & Smith, PC, were retained as attorneys in this matter and, pursuant to the Medical Malpractice Act of 1985, attorneys fees are \$151,377.00, schedule as follows:

1/3 of \$150,000.00	\$ 50,000.00
25% of \$405,508.00	<u>101,377.00</u>
	\$ 151,377.00

Power Rogers & Smith, P.C. have reduced their attorneys' fee to \$38,885.56.

8. Power Rogers & Smith, PC, has incurred expenses in the preparation of the cause of action for trial in the amount of \$11,235.95. An itemized list of expenses has been presented to this Court under separate cover.

9. The next of kin pursuant to the Wrongful Death Act are:

Antonio Hooper, a minor son dob: September 6, 2007

Antwane Hooper, a minor son dob: October 27, 2008

10. Petitioner and her attorney, Larry R. Rogers, believe that an equitable finding of dependency would be as follows:

Antonio Hooper, a minor son 50%

Antwane Hooper, a minor son 50%

11. The balance of \$505,386.49 available for distribution after payment of attorneys' fees (\$38,885.56); reimbursement of expenses (\$11,235.95); shall be distributed to the next of kin of the

decedent as follows:

Antonio Hooper, a minor son	\$252,693.24
Cost of annuity - future periodic payments	<u>- 200,000.00</u>
Present cash distribution	\$ 52,693.24
 Antwane Hooper, a minor son	 \$252,693.25
Cost of annuity - future periodic payments	<u>- 200,000.00</u>
Present cash distribution	\$ 52,693.25

WHEREFORE, plaintiff, MARIA ROSS, as Independent Administrator DBN of the Estate of ANTONESHA ROSS, deceased, moves the Court for the entry of an Order as follows:

A. Finding the settlement offer as set forth above in paragraphs 1, 2 and 3(a) and (b) are fair and reasonable and approved.

B. Finding that Power Rogers & Smith, PC, are entitled to attorneys' fees in the amount of \$38,885.56.

C. Finding that Power Rogers & Smith, PC, is entitled to reimbursement of expenses in the amount of \$11,235.95.

D. Finding that the amount distributable from the settlement after payment of attorneys' fees (\$38,885.56); expenses (\$11,235.95); and cost of annuities (\$400,000.00) the net settlement cash portion of the settlement is \$105,386.49 which shall be paid in accordance with the equitable finding of dependency and shall be distributed as follows:

Antonio Hooper, a minor son	\$ 52,693.24
 Antwane Hooper, a minor son	 \$ 52,693.25

E. The net settlement amount approved herein shall be paid only to a guardian appointed by the Probate Division and the Order shall be effective only after the entry in the Probate Division

of an order approving the bond or other security required to administer the settlement and distribution provided for in this Order.

F. That the Court retains jurisdiction until settlement checks have been delivered to plaintiffs' counsel and annuity premiums paid. Further, annuities cannot be sold, transferred or assigned without prior approval of court.

G. That the above-entitled cause be dismissed as to all Defendants with prejudice and without costs.

Maria Ross

MARIA ROSS, as Independent Administrator DBN of the
Estate of ANTONESHA ROSS, deceased

DEPARTMENT OF PUBLIC HEALTH
STATE OF ILLINOIS

THE DEPARTMENT OF PUBLIC HEALTH,
STATE OF ILLINOIS,

Complainant,

v.

THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.,

Respondent.

Docket No. PTC 11-003

NOTICE OF EMERGENCY SUMMARY SUSPENSION,
NOTICE OF FINE ASSESSMENT
AND NOTICE OF OPPORTUNITY FOR HEARING

Pursuant to the authority granted to the Department of Public Health (hereinafter "Department") by the Ambulatory Surgical Treatment Center Act (hereinafter "Act"), 210 ILCS 5/1 *et seq.* NOTICE IS HEREBY GIVEN:

NOTICE OF EMERGENCY SUMMARY SUSPENSION

In accordance with Sections 5/10f and 5/10d of the Act, Section 205.840 of the Ambulatory Surgical Treatment Center Licensing Requirements Code (77 Ill. Admin. Code 205) (the "Code"), and Section 10-65(d) of the Illinois Administrative Procedure Act (5 ILCS 100/1-5 *et seq.*) (the "APA"), incorporated into the Act at 210 ILCS 5/10a, the Department issues this Notice of Summary Suspension and hereby orders the suspension of the license for the operation of the facility known as Women's Aid Clinic, Department license number 7001647, located at 4751 West Touhy Avenue, Lincolnwood, Illinois, 60712 (the "facility"). **The license suspension shall commence immediately and shall continue indefinitely.**

FINDINGS OF NONCOMPLIANCE

The Department has found conditions in the Respondent facility that are directly threatening to the public interest, health, safety and welfare requiring immediate, emergency action. (210 ILCS 10f). The conditions in the facility directly threatening to the public interest, health, safety and welfare include, but are not limited to, a substantial or continued failure to comply with the Act or any rule promulgated thereunder as referenced below and in the attached exhibits, and violations of the provisions of the Act and the rules promulgated thereunder. These conditions and failure to comply with both the Act and the Code have resulted in the facility's inability to meet the public interest, health, safety and welfare needs of the community.

Department staff commenced a licensure survey of the facility on September 6, 2011 through September 7, 2011. (the "September 2011 survey"). During the September 2011 survey, the

Department observed conditions existing in the facility that threaten the public interest, health, safety and welfare. These conditions include, but are not limited to:

- The facility's failure to develop written policies on medical, surgical, or psychiatric conditions to indicate which patients were ineligible for a surgical procedure (77 Ill. Admin. Code 205.520(f));
- The facility's failure to initiate and perform CPR in accordance with the Facility's policy for a patient who died after the performance of a surgical procedure (77 Ill. Admin. Code 205.540(c));
- The facility's failure to hire a registered professional nurse to supervise and provide patient care (77 Ill. Admin. Code 205.330(a));
- The facility's failure to ensure that a registered nurse supervised the administration of medication in order to ensure that medications were provided by personnel licensed for medication administration (77 Ill. Admin. Code 205.330(a));
- The facility's failure to ensure a sanitary environment in operating rooms, examination rooms, recovery rooms and the laboratory (77 Ill. Admin. Code 205.420(a));
- The facility's failure to ensure that a registered nurse, who is qualified by training and experience in operating room nursing, is present in the operating room and functioning as the circulating nurse during all invasive or operative procedures (77 Ill. Admin. Code 205.530(e)).

The findings from the September 2011 survey are hereby incorporated into this "Notice of Emergency License Suspension" and are more fully set forth in the Statement of Deficiencies. (A copy of the September 2011 Statement of Deficiencies is attached hereto as Exhibit "A").

These conditions constitute a substantial or continued failure on the part of the facility to comply with the Act and with the rules and regulations promulgated under the Act. The condition of the facility has deteriorated to a point where "the public interest, health, safety, or welfare imperatively requires" that the facility's license be suspended on an emergency basis. (210 ILCS 5/10f(c)).

NOTICE OF FINE ASSESSMENT

Pursuant to Section 5/10d of the Act and Section 205.850 of the Code, the Department hereby assesses a fine of \$200/day for the following violations (as set forth more fully above and in the attached exhibits):

Violation of 77 Ill. Admin. Code 205.330(a):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.420(a):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.520(f):

(9-7-11 to 10-21-11) 45 days x \$200/day = **\$9,000.00**

Violation of 77 Ill. Admin. Code 205.530(e):

(9-7-11 to 10-21-11) 45 days x \$200/day = \$9,000.00

TOTAL FINE:

\$36,000.00

NOTICE OF OPPORTUNITY FOR HEARING


The licensee has a right to a hearing to contest this action pursuant to, without limitation, Section(s) 5/10c, 5/10f, and 5/10g of the Act and Section 205.860 of the Code. A written request for hearing must be sent within ten (10) days of receipt of this Notice. Such request for a hearing must be sent to the Illinois Department of Public Health, Division of Health Facilities Standards, 525 West Jefferson Street, Fifth Floor, Springfield Illinois 62761. 10/21

**FAILURE TO REQUEST THE HEARING AS SPECIFIED HEREIN
SHALL CONSTITUTE A WAIVER OF THE RIGHT TO SUCH HEARING.**

ANSWER BY RESPONDENT

In accordance with Section 100.7(d) of the Department's Rules of Practice and Procedure in Administrative Hearings (77 Ill. Admin. Code 100), a copy of which is enclosed, the Respondent shall file a written answer to the Allegations of Noncompliance, within twenty (20) days after receiving this Notice. Such answer must be sent to the Illinois Department of Public Health, Division of Health Facilities Standards, 525 West Jefferson Street, Fifth Floor, Springfield Illinois 62761. 11/10

**FAILURE TO FILE AN ANSWER WITHIN TWENTY (20) DAYS
OF THE RECEIPT OF THIS NOTICE SHALL CONSTITUTE
RESPONDENT'S ADMISSION OF THE ALLEGATIONS OF NONCOMPLIANCE**


Craig Conover, M.D., M.P.H. *MD MPH*
Acting Director
Illinois Department of Public Health

Dated this 21 day of October, 2011.

Nov. 5, 2011,

Ms.Byerley,

Assistant General Counsel

Dear Ms.Byerley,

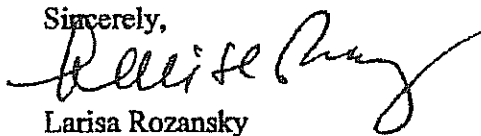
I am sorry to inform you, that after 21 years in business, Women's Aid Clinic, IDPH LIC. NO. 7001647 will be closing as of November 10, 2011.

As an Administrator of the Women's Aid Clinic, I disagree with the Noncompliance Findings from the licensure survey of the Facility by the department staff, which ended on September 7, 2011. One of the conditions was due to" the facility's failure to perform CPR for a patient who died after a surgical procedure". The paramedics initiated a CPR at the Facility before the patient was transferred to St. Francis hospital. CPR was not needed before paramedics arrived.

I requested a hearing before but I do not need it anymore as of today, due to the closing On November 10, 2011.

If you have any questions regarding this letter, please contact me at (847) 676-2428.

Sincerely,



Larisa Rozansky

Women's Aid Clinic

THE DEPARTMENT OF PUBLIC
HEALTH, STATE OF ILLINOIS,

Complainant,

vs.

THE WOMEN'S AID CLINIC
OF LINCOLNWOOD,
(License #7001647)

Respondent.

Docket No. PTC 11-003

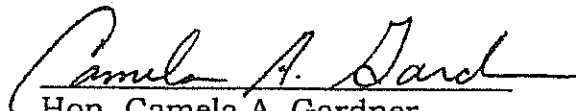
ADMINISTRATIVE LAW JUDGE'S REPORT AND RECOMMENDATION

On November 5, 2011, the Respondent, Larisa Rozansky, the administrator of the, Women's Aid Clinic, (IDPH License # 7001647) submitted a request to withdraw her request for hearing attached hereto and made a part of the record. In support of its request to withdraw, the Respondent reported that a hearing is not longer necessary as the facility is scheduled to close effective November 10, 2011.

Therefore, based Respondent's voluntary request to withdraw

IT IS HEREBY RECOMMENDED:

That this matter be dismissed.



Hon. Camela A. Gardner
Administrative Law Judge
Illinois Department of Public Health

Entered this 28th day of December, 2011.

THE DEPARTMENT OF PUBLIC
HEALTH, STATE OF ILLINOIS,

Complainant,

vs.

THE WOMEN'S AID CLINIC
OF LINCOLNWOOD,
(License #7001647)

Respondent.

Docket No. PTC 11-003

FINAL ORDER

This cause is dismissed in that the Complainant, prior to the administrative hearing, has withdrawn his hearing request in this matter attached here to and made a part hereof.

The Director of the Illinois Department of Public Health has delegated to the undersigned the authority to issue a final order. The undersigned, after careful review and consideration of the entire record of these proceedings, adopts the recommendation of the Administrative Law Judge, attached hereto and made a part hereof.

This order is a final administrative decision within the provisions of the Ambulatory and Surgical Treatment Center Act, the Administrative Procedures Act and the Rules of Practice and Procedure in Administrative Hearings. Any petition for judicial review of this decision shall be filed within 15 days after receipt of the final agency determination.



Teresa Garate, Ph.D.
Assistant Director
Office of the Director
Illinois Department of Public Health

Dated this 12 day of Jan, ²⁰¹²~~2011~~.

STATE OF ILLINOIS

Respondent.

Docket No. PTC 11-003

That said document was deposited in the United States Post Office at Chicago, Illinois, on the 3/5th day of January 2012.

cc: Eva Byerley
File



122 S. Michigan Ave., Suite 7000 • Chicago, IL

Via fax and U.S. Mail

March 7, 2012

Larisa Rozansky
Administrator, Women's Aid Clinic
4751 W. Touhy Avenue
Lincolnwood, IL 60712

**Re: Women's Aid Clinic, ASTC License # 7001647
License Surrender**

Ms. Rozansky:

As you are aware, the Illinois Department of Public Health ("IDPH" or the "Department") suspended your facility License number 7001647 in October of 2011. (A copy of the Notice of Suspension is attached hereto as Exhibit A.) On October 25, 2011, your clinic filed a hearing request with IDPH to contest the allegations outlined in exhibit A and to fight the suspension. (A copy of the hearing request is attached hereto as Exhibit B.) However, on November 5, 2011, you informed IDPH that after further consideration, Women's Aid Clinic had decided to cease operation as an IDPH licensed entity. (A copy of the notice of closure is attached hereto as Exhibit C.)

On January 12, 2012, the Assistant Director of IDPH, Teresa Garate, Ph.D., signed a final order, granting your request that the hearing request be withdrawn and thus affirming the findings and sanctions contained exhibit A. (A copy of the Final Order is attached hereto as Exhibit D.)

As of the date of this letter, Women's Aid Clinic's license remains suspended and the Clinic is prohibited from conducting any procedure that would require a Pregnancy Termination Center ("PTC") License pursuant to the Ambulatory Surgical Treatment Center Act (the "Act"). 210 ILCS 5/.

In order for the Clinic to complete its closure with regard to the IDPH License, Women's Aid Clinic **must** take the additional steps outlined below.

I. Pursuant to Women's Aid Clinic's decision to close, the Clinic MUST return the physical license to IDPH.

Women's Aid Clinic has represented to the Department that it has decided to cease operation as a licensed PTC under the Act. As such, Women's Aid Clinic no longer needs the physical license

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To: Women's Aid
Street, Apt. No.,
or PO Box No. 7001647
City, State, ZIP+4 31210

PS Form 3800, August 2006 See Reverse for Instructions

7010 1060 0002 1903 4907

issued by IDPH (Lic. No.7001647). IDPH now demands that Women's Aid Clinic return the license to the Department within ten (10) days of receiving this letter. The original license **must** be mailed to the Illinois Department of Public Health, Division of Health Facilities and Programs, 525 West Jefferson Street, Fourth Floor, Springfield, Illinois, 62761. **Please be advised that if Women's Aid Clinic fails to return the original license to the Department within the time proscribed above, the Department will be forced to institute a revocation action against the Clinic.**

II. Pursuant to Women's Aid Clinic's decision to withdraw its hearing request, the Clinic MUST pay the Department the Thirty Six Thousand dollar (\$36,000.00) fine assessed in the attached Notice of Summary Suspension.

Women's Aid Clinic officially withdrew its request for a hearing to contest the allegations and remedies contained in the Notice of Summary Suspension. By doing so, Women's Aid Clinic waived its right to contest the assessed fine that was outlined in the Notice attached hereto as exhibit A. As such, the remedies outlined in this notice, including the license suspension and the assessed fine have been officially imposed against the Clinic.

IDPH now demands that Women's Aid Clinic pay the full assessed fine amount as outlined in the original Notice of Summary Suspension within ten (10) days of receiving this letter. A check, made payable to the Illinois Department of Public Health, in the amount of Thirty Six Thousand dollars (\$36,000.00) **must** be mailed to the Illinois Department of Public Health, Division of Health Facilities and Programs, 525 West Jefferson Street, Fourth Floor, Springfield, Illinois, 62761. **Please be advised that if Women's Aid Clinic fails to pay the full assessed fine within the time proscribed above, the Department will be forced to turn this matter over to the Illinois Attorney General's office for collection proceedings.**

III. Pursuant to Women's Aid Clinic's decision to withdraw its license and cease operations as a licensed ASTC, the Clinic Must immediately cease and desist from advertising its ability to perform any and all services that would require an active and valid license.

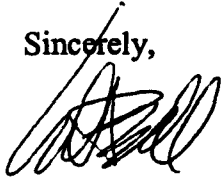
Women's Aid Clinic no longer has a valid, active PTC license. As such, Women's Aid Clinic is prohibited from performing any and all functions that require a Department license, including surgical abortions. It has come to the Department's attention that Women's Aid Clinic's own website (www.womensaidclinic.com) still advertises that surgical abortions are available at the Clinic. (A printout from Women's Aid Clinic's website is attached hereto as Exhibit E.)

IDPH now demands that Women's Aid Clinic immediately remove any and all reference to surgical abortions, and other services that require licensure, from its website. **Please be advised that if Women's Aid Clinic fails to remove any such false advertising from its website and other informational materials, the Department will be forced to refer this matter to the Illinois Attorney General's Office, Consumer Protection Division where this matter will be prosecuted to the fullest extent of the law. Women's Aid Clinic must provide proof that all**

such false advertising has been removed from the website within ten (10) days of the receipt of this letter.

I look forward to working with you to resolve this matter. If you have any questions, please feel free to contact me via e-mail, telephone or U.S. mail.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Bell', written over the word 'Sincerely,'.

William A Bell, Chief
Division of Health Care Facilities and Programs
Illinois Department of Public Health

March 13, 2012

William A. Bell, Chief
Division of Health Care Facilities and Programs
Illinois Department of Public Health

Re: Women's Aid Clinic, license #7001647

2012 MAR 19 A 11:33
DIVISION OF HEALTH CARE FACILITIES & PROGRAMS

Mr. Bell:

I am returning a **physical license** as it was requested in your letter from March 7, 2012.

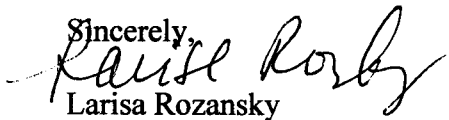
No surgical abortions or any other surgeries are being performed at any time at 4751 W. Touhy Avenue, Lincolnwood location, since after receiving a letter from the Department of Public Health on October 24, 2011.

On December 9, 2011, the new company has been formed and temporarily occupies this location. Temporarily, they have been using our old website but they plan to relocate and launch the new website very soon.

All of the advertisement that pertains to **surgical abortions has been removed** from this site (please check: womensaidclinic.com).

The Women's Aid Clinic **does not exist and does not have any assets or associated bank accounts.**

Sincerely,


Larisa Rozansky

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

FILED LAW DIVISION
2012 AUG 28 AM 11:00
DOROTHY B. BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

People of the State of Illinois *ex rel.*
Illinois Department of Public Health,

Plaintiff,

v.

The Women's Aid Clinic of Lincolnwood,
Inc., an Illinois domestic corporation,

Defendant.

No.

Amount Claimed: \$36,000.00

20121009696
SALENOAR/ROOM Y
TIME 00:00
Clerk of the Court

VERIFIED COMPLAINT

Now comes the Plaintiff, People of the State of Illinois *ex rel.* Illinois Department of Public Health, by and through its attorney Lisa Madigan, Attorney General of Illinois, and complaining of the Defendant The Women's Aid Clinic of Lincolnwood, Inc., states as follows:

1. The Plaintiff, the Illinois Department of Public Health ("Department") is a statutory department of the State of Illinois created by Section 5-15 of the Civil Administrative Code of Illinois, 20 ILCS 5/5-1 *et seq.*

2. The Defendant, The Women's Aid Clinic of Lincolnwood, Inc. ("WA-Lincolnwood"), is an Illinois domestic corporation that, at all relevant times, maintained a principal place of business at 4751 W Touhy Ave., Lincolnwood, IL 60646.

3. The Department, under the authority granted by the Ambulatory and Surgical Treatment Center Act ("ASTC Act")(210 ILCS 5/1 *et seq.*), issued and served a Notice of Emergency Summary Suspension, Notice of Fine Assessment, and Notice of Opportunity for Hearing to WA-Lincolnwood on October 21, 2011. The Notices are attached to this complaint as Group Exhibit A.

4. On October 25, 2011, WA-Lincolnwood requested a hearing according to the Department's October 21 Notices. WA-Lincolnwood's October 25 letter is attached to this complaint as Exhibit B.

5. On November 5, 2011, WA-Lincolnwood withdrew its request for hearing. WA-Lincolnwood's November 5 letter is attached to this complaint as Exhibit C.

6. The Department entered a Final Administrative Order on January 12, 2012 suspending WA-Lincolnwood's ASTC Act license and assessing a \$36,000.00 fine for noncompliance with the Act. The Final Administrative Order is attached to this complaint as Exhibit D.

7. The Department served the above Final Administrative Order on January 30, 2012. See Exhibit D.

8. Defendant WA-Lincolnwood did not file a complaint for administrative review of the Department's Final Administrative Order within the time required by the Administrative Review Law and the time to do so has expired.

9. Defendant WA-Lincolnwood has not paid the \$36,000.00 fine assessed in the Department's Final Administrative Order or any portion thereof.

Wherefore, the Plaintiff, People of the State of Illinois *ex rel.* Illinois Department of Public Health prays (1) that judgment be entered in favor Plaintiff and against the Defendant The Women's Aid Clinic of Lincolnwood, Inc. in the amount of \$36,000.00 plus statutory interest as provided by 735 ILCS 5/2-1303; and (2) for any other relief the Court deems equitable and just.

Respectfully submitted,

LISA MADIGAN
Attorney General of Illinois

By: 

Vincent Kan
Assistant Attorney General

LISA MADIGAN
Illinois Attorney General
Revenue Litigation Bureau
100 W. Randolph St., Rm. 13-210
Chicago, IL 60601
(312) 814-2497
Atty. No. 99000

State of Illinois

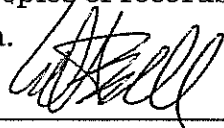
SS:

County of Cook

VERIFICATION

William A. Bell, being first duly sworn, on oath deposes and says as follows:

1. That he is employed by the Illinois Department of Public Health in the capacity of Chief, Division of Health Care Facilities and Programs.
2. That he is authorized to and does make this affidavit as agent of the Illinois Department of Public Health under its certification.
3. That he has knowledge of the facts relating to the claims set forth in the foregoing Complaint.
4. That the matters and things set forth in said Complaint are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned believes the same to be true.
5. That there is due to the Plaintiff from the Defendants the sum of \$36,000.00 in Ambulatory and Surgical Treatment Center Act liability as a result of the Department's Final Administrative Order dated January 12, 2012.
6. That pursuant to Illinois Supreme Court Rule 222 the total of money damages sought does not exceed \$50,000.00.
7. That he hereby certifies that the photocopied records attached and described to the Complaint as Exhibits are true and correct copies of records in the custody of the Illinois Department of Public Health.



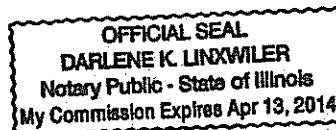
William A. Bell, Chief
Division of Health Care
Facilities and Programs
Illinois Department of
Public Health

Subscribed and sworn to

before me this 23RD day


of August 20 12
Darlene K. Linkwiler

Notary Public



WWW.CYBERDRIVEILLINOIS.COM

JESSE WHITE
SECRETARY OF STATE



CORPORATION FILE DETAIL REPORT

Entity Name	THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC.	File Number	56625186
Status	NOT GOOD STANDING		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	12/02/1991	State	ILLINOIS
Agent Name	MARK R GLICKMAN	Agent Change Date	12/13/2010
Agent Street Address	3330 DUNDEE RD STE C4	President Name & Address	LARISA ROZANSKY 4751 W. TOUHYLINCOLNWOOD IL 60646
Agent City	NORTHBROOK	Secretary Name & Address	LARISA ROZANSKY 4751 W. TOUHYLINCOLNWOOD IL 60646
Agent Zip	60062	Duration Date	PERPETUAL
Annual Report Filing Date	00/00/0000	For Year	2013

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JESSE WHITE
SECRETARY OF STATE



CORPORATION FILE DETAIL REPORT

Entity Name	WOMEN'S AID CENTER, INC.	File Number	68112842
Status	ACTIVE		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	12/09/2011	State	ILLINOIS
Agent Name	MARK R GLICKMAN	Agent Change Date	12/09/2011
Agent Street Address	3330 DUNDEE RD C4	President Name & Address	LARISA ROZANSKY 4801 W PETERSON AVE #609 CHICAGO 60646
Agent City	NORTHBROOK	Secretary Name & Address	SAME
Agent Zip	60062	Duration Date	PERPETUAL
Annual Report Filing Date	12/06/2013	For Year	2013

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, SECOND DISTRICT

HUNTER PROPERTIES, INC.,

Plaintiff,

v.

THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC.,
LARISA ROZANSKY and ALL UNKNOWN OCCUPANTS,

Defendants.

No. 12 M2 000675

AGREED ORDER FOR POSSESSION

This cause coming on to be heard before me today on the complaint of the Plaintiff, HUNTER PROPERTIES, INC., the issues having been heard and determined by the Court, the parties hereto being in full agreement and having otherwise stipulated as follows, and the Court having found that the Plaintiff, HUNTER PROPERTIES, INC., is entitled to the premises described herein;

IT IS HEREBY ORDERED AND ADJUDGED AS FOLLOWS:

1. The Plaintiff, HUNTER PROPERTIES, INC., shall have and recover of and from the Defendants, **THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC. and ALL UNKNOWN OCCUPANTS**, the possession of the following described premises:

**THE WOMEN'S AID CLINIC OF LINCOLNWOOD, INC.
and ALL UNKNOWN OCCUPANTS
4751 WEST TOUHY AVENUE
SUITE #101 (Garden Level Unit)
LINCOLNWOOD, ILLINOIS 60712**

2. Enforcement of this judgement is stayed until **April 30, 2012**. Pursuant to Supreme Court Rule 304(a), the court expressly finds that there exists no just reason to delay enforcement of this order, subsequent to the expiration of the stay entered herein, if any.

DATE ENTERED: 4/13/12

ENTER: Sheldon G. Perl #19362

I hereby certify the above to be correct

Dated DOROTHY BROWN MAY 22 2012
(Seal of Clerk of Circuit Court)

Clerk of the Circuit Court of Cook County, Illinois

This order is the command of the Circuit Court, and violation thereof is subject to the penalty of law.

SHELDON G. PERL #19362
Attorney for Plaintiff
7161 North Cicero Avenue, Suite 204
Lincolnwood, Illinois 60712
(847) 673-8575 / FAX (847) 933-9634

Receiver's telephone number:
(773) 550-0074

DUPLICATE ORIGINAL

**Exhibit
A-11**



EVICTIION DISCLOSURE FORM

SHERIFF OF COOK COUNTY - COURT SERVICES

PLEASE FILL OUT THE FOLLOWING INFORMATION AND ENSURE THAT ALL CONTACT INFORMATION IS CORRECT.

FOR OFFICE USE ONLY

☐ I DO NOT HAVE A LAWYER (Pro Se Litigant)

☒ I AM AN ATTORNEY REPRESENTING A CLIENT

1. CASE NUMBER: 12ma 000673

2. ATTORNEY INFORMATION (If you do not have a lawyer, please leave this section blank):

NAME: Sheldon G. Perl ADDRESS: 7161 N. Cicero Ave., Ste. #204, Lincolnwood, IL 60712

E-MAIL: sheldongperl@gmail.com PHONE (CELL AND/OR DAY CONTACT NUMBER): 847/219-4619 or 847/673-8575

3. LANDLORD/PLAINTIFF INFORMATION:

NAME: Hunter Properties, Inc. ADDRESS: (773) 550-0074

EMAIL: hpaulock@hunterprop.com TEXT MESSAGE/SMS NOTIFICATION? YES ☒ NO ☐ [By checking YES: Standard Data/SMS rates apply.]

4. WHO DO YOU WANT TO RECEIVE THE 24-HOUR NOTICE PHONE CALL BEFORE THE EVICTION?

☐ MY ATTORNEY ☒ THE LANDLORD/AGENT ☐ OTHER: Milary Paulock NAME: 773/550-0074 PHONE (CELL AND/OR DAY CONTACT NUMBER): 773/550-0074 E-MAIL:

5. WHO WILL BE AT THE PROPERTY WHEN THE SHERIFF ARRIVES TO DO THE EVICTION?

☐ MY ATTORNEY ☒ THE LANDLORD/AGENT ☐ OTHER: Milary Paulock NAME: 773/550-0074 PHONE (CELL AND/OR DAY CONTACT NUMBER): 773/550-0074 E-MAIL:

FOR 6. PLEASE SELECT THE SITUATION THAT APPLIES TO YOUR CASE AND FILL OUT THE NECESSARY INFORMATION:

☒ I AM THE LANDLORD OR AN AGENT OF THE LANDLORD OR ASSOCIATION. MY EVICTION IS FOR A:

☒ RESIDENTIAL RENTAL PROPERTY (including, but not limited to a condominium being rented to tenants).

☐ CONDOMINIUM OR HOMEOWNERS ASSOCIATIONS (if you are seeking past dues etc.).

☐ COMMERCIAL/ BUSINESS ENTITY (including LLCs, Partnerships, Sole Proprietors, Rental establishments NOT occupied as residences etc.).

MORTGAGE FORECLOSURES

7. ☐ THIS IS A MORTGAGE FORECLOSURE ACTION WITHOUT FORCIBLE DETAINER ACTION(S) ATTACHED. OR:

8. ☐ THIS IS A FORCIBLE DETAINER THAT AROSE FROM A MORTGAGE FORECLOSURE ACTION. IF YES, PLEASE FILL OUT A-C:

A. MORTGAGE FORECLOSURE CASE NUMBER [CHANCERY DIVISION]:

B. DATE THE NOTICE OF INTENT WAS SERVED:

C. DATE THE FORCIBLE ACTION WAS FILED WITH THE CLERK OF THE CIRCUIT COURT: OR:

9. ☐ THIS IS A MORTGAGE FORECLOSURE ACTION WITH FORCIBLE DETAINER ACTION(S) ATTACHED? IF YES, PLEASE FILL OUT THE FOLLOWING:

Forcible Detainer Case Number (Municipal Division)	Date the Notice of Intent was Served	Date the Forcible Detainer was filed with the Clerk of the Circuit Court

10. TO THE BEST OF YOUR KNOWLEDGE, PLEASE LIST ALL OCCUPANTS OF THE PROPERTY. THIS INFORMATION IS IMPORTANT FOR OFFICER SAFETY AND FOR POSSIBLE REFERRAL FOR SERVICES AND WILL NOT BE USED TO DELAY THE SCHEDULING OF YOUR EVICTION.

LAST NAME	FIRST NAME	PHONE NO.	IS THIS PERSON OVER 65 YEARS OF AGE? (Check if applicable)	IS THIS PERSON UNDER 14 YEARS OF AGE? (Check if applicable)	IS THIS PERSON DISABLED OR HAVE MENTAL HEALTH CONDITIONS? (Check if applicable and please explain)
The Women's Aid		847/1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clint of Lincolnwood		676-	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
INC.		2127	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. ARE THERE ANY ANIMALS ON THE PROPERTY THAT OFFICERS SHOULD BE AWARE OF? YES ☐ NO ☒

IF YES, PLEASE LIST THEM:

NOTE: WHERE OCCUPANTS ARE CHILDREN, ELDERLY, HAVE MENTAL HEALTH CONDITIONS, ARE DISABLED OR HAVE PETS, THE SHERIFF'S SOCIAL WORKER WILL ATTEMPT TO NOTIFY AND COORDINATE WITH SOCIAL SERVICES TO ASSIST OCCUPANTS IN VACATING THE PROPERTY.

12. IS THERE ANYTHING ON SITE THAT MAY COMPROMISE OFFICER SAFETY? YES ☐ NO ☒ If so, please explain:

13. I HAVE READ THIS DISCLOSURE AND COMPLETED IT TRUTHFULLY AND TO THE BEST OF MY KNOWLEDGE.

Sheldon G. Perl

NAME OF PERSON COMPLETING FORM (PRINT)

SIGNATURE

MAY 22 2012

DATE

NOTE: RESIDENTIAL EVICTIONS WILL NOT OCCUR WHEN A HEAT INDEX WARNING IS IN EFFECT, THE TEMPERATURE IS BELOW 15° F, OR REGARDLESS OF OUTSIDE TEMPERATURE, IF EXTREME WEATHER CONDITIONS ENDANGER THE HEALTH AND WELFARE OF THOSE BEING EVICTED. YOU WILL BE CONTACTED AT LEAST ONE BUSINESS DAY BEFORE THE EVICTION DATE AT THE NUMBER PROVIDED IN # 5 (ABOVE) OR THE NUMBER LISTED ON YOUR COURT ORDER. YOU CAN TRACK YOUR EVICTION ONLINE AT <http://www.cookcountysheriff.org>. IF NO ONE IS PRESENT WHEN THE SHERIFF ARRIVES, THE EVICTION CAN BE DELAYED. IF THE DEFENDANT FILES A MOTION, YOUR EVICTION CAN ALSO BE DELAYED UNTIL IT EXPIRES OR THE JUDGE ORDERS OTHERWISE. FOR OFFICER SAFETY, PLEASE DO NOT TELL OCCUPANTS WHEN THE SHERIFF HAS GIVEN YOU NOTICE OF THE UPCOMING EVICTION.



SHERIFF'S OFFICE OF COOK COUNTY, ILLINOIS
50 W. WASHINGTON ROOM 701
CHICAGO, IL 60602
(312) 603-3365

05/22/2012

PERL SHELDON G
7161 N CICERO AV STE 204
LINCOLNWOOD, IL 60712
(847)673-8575

RE: 12M2000675
DEFENDANT: THE WOMEN'S AID CLINIC OF
LINCOLNWOOD, INC.
EVICTON LOCATION
4751 W TOUHY AVE SUITE 101 GARDEN LEV
LINCOLNWOOD, IL 60712

YOU HAVE FILED AN ORDER OF POSSESSION WITH THE EVICTION UNIT OF THE COOK COUNTY SHERIFF'S OFFICE. THE EVICTION WILL BE DONE ANYTIME AFTER TWENTY-FOUR (24) HOURS FROM THE DATE OF THIS LETTER AS THE SCHEDULE PERMITS. YOU CAN CHECK THE SHERIFF'S WEBSITE AT WWW.COOKCOUNTYSHERIFF.COM

TO TRACK THE EVICTIONS SCHEDULE. YOU WILL NEED THE FOLLWING INFORMATION TO CHECK FOR YOUR EVICTION.

DISTRICT NUMBER: 712
SHERIFF'S NUMBER: 00692391

COOK COUNTY SHERIFF'S OFFICE
CIVIL DIVISION EVICTION UNIT

JON614

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Second MUNICIPAL DISTRICT

Hunter Properties, Inc.,
 Plaintiff

v.

The Women's Aid Clinic of Lincolnwood, Inc., et al.,
 Defendant

No. 12 ma 000675

ORDER

This matter having come before the court, the court having jurisdiction as being fully advised in the premises:

IT IS ORDERED AS FOLLOWS:

4219 ☐

4001 ☐ XP Default Judgment for Plaintiff For \$ _____ and Costs.

9207 ☐ Payment Plan ☐ yes ☐ no.

9293 ☐ Assess costs _____

4002 ☐ XP Default Judgment for Defendant For \$ _____

4219 ☐ (on counter complaint or third party complaint)

4293 ☐ 4293 Assess costs _____

4001 ☐ XP Default Judgment For Plaintiff

4301 ☐ XP Default Judgment for specific Litigant

4219 ☐ ~~XP Default Judgment for specific Litigant~~

8001 ☒ Judgment for Plaintiff after Trial for \$ 50,000.00 and Costs, against the party Defendant,

9207 ☐ Payment Plan ☐ yes ☐ no.

4293 ☐ Assess costs _____

8002 ☐ Judgment for Defendant after Trial

8301 ☐ Judgment for Specific Litigant after Trial in favor of

_____ For \$ _____ and Costs.

☒ See Attached Order This matter is now off-call.

Atty. No. 19362

Name: Sheldon G. Perl

Enter: May 18, 2012

Attorney For: Plaintiff

Address: 7161 N. Cicero Ave., #204




City/Zip: Lincolnwood, IL 60712

Judge

Judge's No.

WOMEN'S AID CLINIC

Providing the support and care you deserve

We speak:    
Call Us @ (800) 998-4751 • (847) 676-2428 • (773) 725-4232
4751 W. Touhy Ave. | Lincolnwood, IL 60712
We are located 2 blocks east on Touhy Ave. off 94

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Surgical Abortion

The vacuum aspiration abortion procedure is done in our clinic, using the safe and most common method of abortion performed in the United States. We offer first trimester abortion services from 6 to 14 weeks of pregnancy with two types of anesthesia.

Local Anesthetic

The local anesthesia is the simplest and least expensive method. Injection of Lidocaine is used to numb the area where the surgery is taking place. This means your cervix will be numb, but you will still feel some cramping. The nurse and/or counselor will assist you in relaxing during the procedure.

Twilight or IV Sedation

Through the IV (intravenous) you will receive sedative medication to relieve your anxiety and produce a tranquil, asleep state. This sedation is recommended for women who have a very low tolerance to discomfort, nervous about the procedure or have never been pregnant before.

Information prior to surgical abortion

- Do not have anything to eat, drink, smoke or chew after midnight the night before your surgery.
- Please remember not to use alcohol or drugs the day of or night before your appointment. If you take prescription medication, you may be instructed to take them with a small amount of water in the morning of surgery (especially if the prescription medication is for your heart, lungs, or blood pressure). Please bring medications with you on the day of your appointment. You should let us know about any important medical conditions you might have such as: heart

Other Services

Urine Pregnancy Testing

Blood Pregnancy Test

D & C Procedure (Dilation & Curettage)

STD Testing

Emergency Contraception

Routine Gynecological Exams and Pap Smears

Birth Control Methods

Pills

Depo-Provera

NuvaRing

IUD (intrauterine device)

Diaphragm Fittings



SCHEDULE AN APPOINTMENT ONLINE

Call Us @ (773) 725-4232 • (847) 676-2428 • (800) 998-4751
4801 Peterson, suite 609 | Chicago, Illinois 60646
We are located on Peterson Ave., just east of I-94

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- WOMEN'S HEALTH
- ABORTION
- STDs
- BIRTH CONTROL
- FAQ
- CONTACT US



About Us

We know it can be difficult to make reproductive healthcare choices... from remembering to schedule an annual pap smear to deciding not to continue pregnancy. We provide women with safe, legal and confidential services in a compassionate and supportive setting.

read more

Hours & Location

* Free Easy Parking – Large Parking Lot
4801 Peterson Ave., Suite 609
Chicago, Illinois 60646
(773) 725-4232, (847) 676-2428, or (800) 998-4751

Monday: 9 – 5
Tuesday: 8 – 5

Our Services

We are able to offer our patients a less costly alternative to a regular doctor's office providing the following services:

- Non-Surgical Abortion – Abortion Pill
- General Gynecology & Women's Health
- Pap Smear, HPV & Colposcopy

Testimonials

"In a time of uncertainty and confusion, Woman's Aid was very helpful, caring and supportive. I would recommend a visit to visit the clinic."



- ANONYMOUS -

"I have

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Exhibit A-13

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[Women's Aid Clinic - Abortion Clinic - WomensAidCenter.com](#)



Ad [www.womensaidcenter.com/](#) ▾ 1 (773) 569 3364

Northwest Side of Chicago. Call Now to Schedule Appt.

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[Womens Aid Clinic - Lincolnwood, IL, \(Illinois\) - HealthGrades](#)

[www.healthgrades.com](#) › ... › [Illinois \(IL\)](#) › [Lincolnwood](#) ▾ [HealthGrades](#) ▾

Womens Aid Clinic, a Medical Group Practice located in **Lincolnwood**, Illinois, (IL)

[Women's Aid Clinic Ltd in Lincolnwood, IL - 773-725-4232](#)

[www.switchboard.com/business/womens-aid-clinic-ltd-lincolnwood-il-2](#) ▾

Find **Women's Aid Clinic Ltd** at 4751 W Touhy Ave Ste 101, **Lincolnwood**, IL. Call them at (773) 725-4232.

[Women's Aid Clinic Limited in Lincolnwood, IL | 4751 W Touhy Ave ...](#)

[www.superpages.com/.../Lincolnwood.../A-Womens-Aid-Clinic-Limited-...](#) ▾

Women's Aid Clinic Limited in **Lincolnwood**, IL – Map, Phone Number, Reviews, Photos and Video Profile for **Lincolnwood Women's Aid Clinic Limited**. Women's ...

Women's Aid Clinic - WomensAidCenter.com

Ad www.womensaidcenter.com/ 1 (773) 569 3364

We Provide Safe & Confidential Services in a Supportive Setting.

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[Service Info](#)

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[Directions](#)

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Ad www.illinoisabortion.com/ 1 (877) 417 0795

Abortions Medical and Surgical

Women's Aid Clinic

www.womensaidcenter.com/

Chicago Abortion **Clinic**. **Women's Aid** Center. We provide women with safe, legal and confidential services in a compassionate and supportive setting.

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Women's Aid Clinic

www.womensaidclinic.com/

WEBSITE IS UNAVAILABLE. . Download Google Chrome (LNK). View on Mobile.

Women's Aid Clinic Ltd in Lincolnwood, IL - 773-725-4232

www.switchboard.com/business/womens-aid-clinic-ltd-lincolnwood-il-2

Find **Women's Aid Clinic** Ltd at 4751 W Touhy Ave Ste 101, Lincolnwood, IL. Call them at (773) 725-4232.

women's aid clinic « Pro-Life Hotline

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Women's Aid Clinic

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 (773) 725-4232

Abortion Facts - Abortion Pill - Women's Health

Women's Aid Center - Sauganash - Chicago, IL - Yelp

www.yelp.com > Health & Medical > Medical Centers > Yelp, Inc.

★★★★★ Rating: 5 - 1 review

1 Review of **Women's Aid Center** "Some of the best professionals around and they've been good to me and kept me healthy over the years.I have noticed ...

Women's Aid Center | AbortionDocs

abortiondocs.org/clinic/medical/344/

Womens Aid - Inspection Report - Sep 7, 2011. The IL Dept of Health issues the immediate, emergency suspension of **Women's Aid** Clinic license, after noting ...

women's aid clinic « Pro-Life Hotline

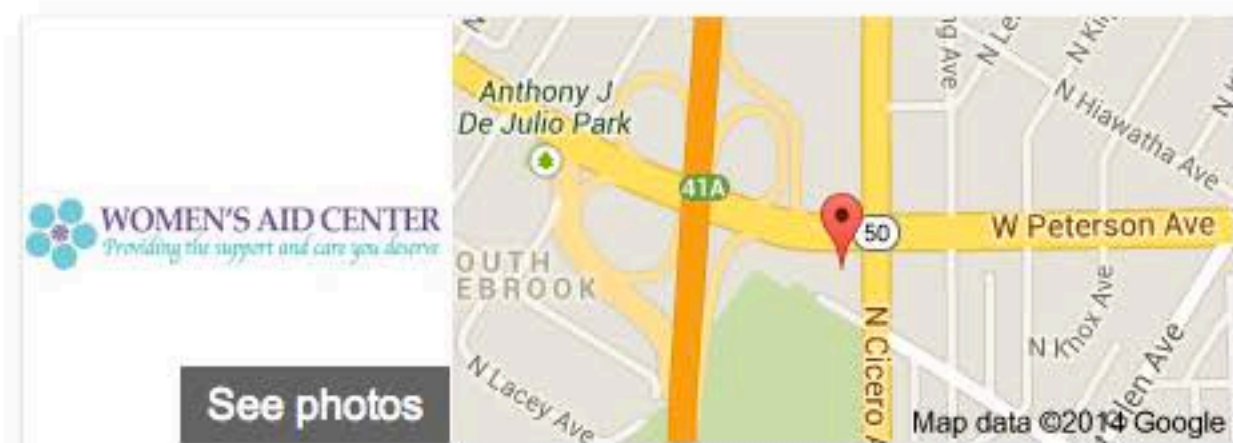
prolifeaction.org/hotline/tag/womens-aid-clinic/

Jan 15, 2014 - Tags: judge alexander white, larisa rozansky, scott skaletsky, vincent kan, **women's aid center**, women's aid clinic, women's aid clinic of ...

women's aid center « Pro-Life Hotline

prolifeaction.org/hotline/tag/womens-aid-center/

Jan 15, 2014 - Tags: judge alexander white, larisa rozansky, scott skaletsky, vincent



Women's Aid Center, Inc.

Directions

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Address: 4801 W Peterson Ave #609, Chicago, IL 60646

Phone: (773) 725-4232

Hours: Monday 9:00 am – 5:00 pm - [See all](#)

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Recent posts

Common Questions & Myths about Abortion <http://www.prochoice.org/>...

Jan 16, 2014

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

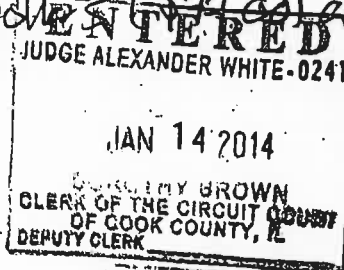
People ex rel. IL Dept. of Public Health

v.

No. 2012 L 9696The Women's Aid Clinic of Lincolnwood, Inc. et al.

ORDER

This matter coming to be heard upon a motion for Turnover Order and the Court being advised, the Motion is GRANTED as to Seventy-Seven Dollars (\$77.00) and is DENIED as to all other sums.



ENTERED
JUDGE ALEXANDER WHITE-0241

Atty. No.: 99060Name: Vincent Kan, AAG

ENTERED:
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

Atty. for: PlaintiffAddress: 108 W Randolph St., 13th Fl.City/State/Zip: Chicago, IL 60601Telephone: (312) 844-2497

Dated: _____

Judge

Judge's No.