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DAUPHIN COUNTY
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: CIVIL ACTION LAW
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: NO. 2013-CV-09708-CV

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Jury Trial Demanded

PRODUCTION

and in support thereof, Plaintiff avers the following:

ki, is an adult individual residing in the County of
herein did occur in the county of Dauphin PA.

yski, MD is, and at all times relevant hereto was, a
specialty in psychiatry, and practiced in Dauphin
and belief, at times relevant hereto, Kruszewski was
nia Medical Society and/or Foundation of the

an adult individual, who, at all times relevant hereto,
with Defendant Kruszewski, and was his medical
Pennsylvania.

believed to be deceased but was, at all times relevant
physician who was, or is, employed by Defendants

Pennsylvania Medical Society and/or Foundation of the Pennsylvania Medical Society. He was at all times located in Dauphin County, Pennsylvania.

5. Defendant, Pennsylvania Medical Society (herein PMS) is a professional association for Pennsylvania's licensed physicians and medical professionals, and is located in Dauphin County, Pennsylvania.

6. Defendant, Foundation of the Pennsylvania Medical Society is, upon information and belief, a subsidiary organization of the Defendant Pennsylvania Medical Society.

7. Defendant, Garen Meguirian, is a licensed Pennsylvania attorney, who has, at times relevant hereto, acted as the agent of Defendant Kruszewski. His office is located in Paoli, Pennsylvania.

8. Defendant, John/Jane Does, are currently unknowable adult individuals, at least one of whom may have been associated with Marworth in Waverly, PA, who consulted and/or worked with the other Defendants throughout the matters complained of herein.

FACTUAL BACKGROUND

9. Plaintiff sought medical treatment from Defendant Kruszewski through the Pennsylvania Bar Association "Lawyers Concerned for Lawyers" program in or around June 2003, for certain symptoms that he had experienced throughout most of his life. Plaintiff recently discovered during another professional evaluation, in or around early 2013, that these problems emanated from Post Traumatic Stress Disorder (PTSD), resulting from a childhood accident causing second and third degree burns on over 15% of his body.

10. Plaintiff also discovered that he suffers an attachment disorder, due to the long-term separation from his family, while hospitalized for over five weeks at the impressionable age

of eight, due to these burns. Current research states that attachment disorders are the result of negative experiences in early life.

11. Plaintiff had several lengthy consultations with Defendant Kruszewski, during which he recorded copious notes of his investigative inquiries, including a trauma analysis, which is a standard psychiatric diagnostic technique.

12. Plaintiff confided to Kruszewski in depth about every relevant detail of his entire life, specifically recounting the accident causing the burns.

13. Plaintiff avers that Kruszewski used this knowledge in violation of his professional code of ethics, withheld the PTSD diagnosis from Plaintiff, and acted immorally, and intentionally caused egregious emotional and financial damage, and ultimately contributed to the further deterioration of the well-being of Plaintiff.

14. Plaintiff had sought help in the past concerning the struggles that he had throughout his life, but, because there was no information on PTSD and pain treatment until into the 1990s, the proper diagnosis and treatment evaded him.

15. PTSD in child burn victims had been studied extensively at the time that Plaintiff met Kruszewski. It was already common knowledge, and widely published in prestigious medical journals, that PTSD leads to severe chronic hormonal and cognitive perception problems, if not properly treated, particularly in child burn victims. Current medical research concludes that PTSD is a physiological impairment which can result from a disruption of the hypothalamus/pituitary/adrenal system (the HPA axis), when the patient is inadequately treated for pain. In 1973, when the Plaintiff was hospitalized at the critical developmental age of eight, the specialty of Pain Management was not established.

16. Plaintiff has recently retrieved his medical records from the hospital where he was treated for the burns, which clearly show he was indeed under-medicated for pain, and unnecessarily traumatized, by today's standards.

17. Defendant Kruszewski gained Plaintiff's confidence and trust, with representations about himself and his credentials. Kruszewski is a graduate of Princeton University, and Harvard Medical School. He has board certification in general psychiatry as well as the subspecialties of geriatric, adolescent, and addiction psychiatry, and in addiction medicine.

18. Plaintiff confided to Kruszewski that he was trying to save his marriage, and was desperate for help.

19. Upon information and belief, Kruszewski communicated Plaintiff's healthcare information to Defendant Hobbs and others without the knowledge or consent of the Plaintiff.

20. The meetings between Plaintiff and Kruszewski were always at Kruszewski's private residence.

21. Plaintiff in confidence told Kruszewski that he was self-medicating to deal with his symptoms that interfered with his marriage, and all aspects of his life.

22. After the initial diagnostic consultations, Kruszewski knew that Plaintiff suffered from PTSD; however, at no time did Kruszewski ever inform Plaintiff of that proper diagnosis. Instead, Kruszewski only told Plaintiff that he suffered from "substance abuse."

23. Kruszewski recommended Plaintiff go to an inpatient rehabilitation center called Marworth, which is also where Kruszewski, through Defendant PMS, sent many physicians for treatment for similar problems. Plaintiff was admitted there for approximately three weeks in August 2003.

24. Plaintiff was further subjected to a battery of psychological tests at Marworth, the results of which were communicated to Kruszewski, all of which are believed to have further confirmed that Plaintiff was suffering from PTSD, but Kruszewski never disclosed that diagnosis to the Plaintiff.

25. After Plaintiff was released from Marworth, Kruszewski recommended holding an “intervention” with Plaintiff’s immediate family. At the time, Plaintiff had not abused any substances for three or four months, and this step seemed unwarranted. Plaintiff had been having marital problems due to his unresolved medical issues, was trying to reconcile with his wife, and most of his family-of-origin did not live in Harrisburg, and was not relevant to his current situation.

26. Kruszewski consulted with Plaintiff’s now ex-wife, about the prospects of treatment, telling her it was solely an addiction issue; however, Kruszewski knew that Plaintiff was suffering with the chronic condition of PTSD.

27. Plaintiff objected to Kruszewski involving his family; however, he was struggling severely, and was influenced by Kruszewski because of his demeanor and credentials. He accused the Plaintiff of creating a problem by resisting, so Plaintiff agreed to the intervention. Regardless, Plaintiff’s family of four brothers, a sister, and parents, all met at Kruszewski’s residence.

28. The meeting proved to be therapeutically pointless, however, Kruszewski continually refer to Plaintiff’s family’s personalities throughout the next year of treatment.

29. Kruszewski had oddly worn a wedding band only to this intervention, as it was never worn during sessions with Plaintiff, and Kruszewski talked of a “son,” to Plaintiff’s

family, although Plaintiff had previously been led to believe Kruszewski was not married, and had no children.

30. Plaintiff subsequently learned that Kruszewski is homosexual, and lives with Defendant Tobiasz, who was also his medical assistant. There was another adult male, who they call their son, living with them. This is all relevant, because it is believed Defendants Kruszewski and Tobiasz attempted to seduce Plaintiff into a homosexual relationship with them.

31. Over the next several months, Plaintiff continued to meet with Kruszewski, attended 12-step meetings as advised by Kruszewski, and abstained from all substance use. However, his symptoms did not subside, and in fact, worsened, causing his marital problems to amplify, and interfered with his professional occupation as an attorney. Without the proper diagnosis and treatment of the root of his symptoms, Plaintiff's entire life deteriorated substantially while Kruszewski was his physician.

32. Plaintiff persistently reiterated to Kruszewski that he was still feeling the intense symptoms he had suffered for decades, that was out-of-proportion to events in his current life, and in fact was causing problems that he had not experienced previously, such as being unable to work.

33. It is now obvious that these were symptoms of the undiagnosed PTSD, which current scientific research shows, results from the irregular production of the stress hormone, cortisol. It is a physiological issue, and not a mental illness or weakness.

34. With the recent revelation in January of 2013 of the proper diagnosis, and true source of Plaintiff's struggles, which is key to recovering from any condition, Plaintiff has received treatment, without medication or drugs of any kind, and his functioning has improved immensely.

35. Plaintiff was diligent in attending his sessions with Kruszewski (for which he charged Plaintiff at his regular hourly rate), was not using drugs, was trying to focus on his work, and hoping to reconcile with his wife.

36. According to Kruszewski, he is a specialist in addiction psychiatry and was opposed to the use of any and all “substances.” Plaintiff abided by that treatment, and never once asked Kruszewski to prescribe any drugs, and participated in the 12 step meetings faithfully.

37. However, early in the treatment, Kruszewski did prescribe a small dose of a thyroid extract for mood regulation, and a prescription to help Plaintiff sleep, as needed.

38. In early 2004, Plaintiff experienced an increase of stress as a result of the emotional impact of the divorce proceedings coming to their conclusion, and work-related stressors magnifying, and he relapsed into self-medicating, because of lack of proper treatment from Kruszewski.

39. Plaintiff began seeking medical help from Kruszewski and Defendant Tobiasz, however they rarely returned phone calls. Kruszewski was rude and dismissive when he did contact Plaintiff, and just directed Plaintiff to “go to meetings.”

40. This went on for months, as the work and other stressors intensified; however Kruszewski continued to neglect Plaintiff as his patient.

41. During Plaintiff’s treatment with Kruszewski, Plaintiff talked of his admiration for, and close personal relationship with, his then-law partner and long time colleague, Don Bailey. Mr. Bailey was formerly a United States Congressman, the Auditor General of Pennsylvania and a decorated Vietnam War veteran. Kruszewski expressed a strong interest in meeting him.

42. At some time in late 1994, it was suggested to Plaintiff by a close friend who was a doctor that Plaintiff may be bipolar, given his proclivity for self-medicating. Plaintiff shared this information with Kruszewski, who immediately prescribed Plaintiff lithium, without even discussing the condition, nor did he issue an official diagnosis; Plaintiff took the medication briefly, with no positive results.

43. Kruszewski knew that Plaintiff did not suffer from bipolar disorder, and that lithium was an inappropriate medication to prescribe.

44. Plaintiff did not feel it was proper treatment, but on Kruszewski's representations about his experience and qualifications, coupled with the fact that he was referred to Plaintiff through the bar association, Plaintiff abided by the treatment.

45. By early 2005, Plaintiff's condition had deteriorated significantly. He was divorced, and under enormous stress, as he began to be targeted and mistreated by judges because of the civil rights work he did, and had suffered financial setbacks as a result as well.

46. Plaintiff was feeling completely lost and alone and felt abandoned by Kruszewski, and he had begun to become acutely suicidal.

47. The studies of the effects of cortisol on the human body correlate with Plaintiff's symptoms of chronic PTSD. Plaintiff avers that the diagnosis was deliberately withheld from him, as was appropriate treatment, to manipulate and weaken Plaintiff emotionally. At the time, however, Plaintiff had no idea what PTSD and cortisol were.

48. In February 2005, Plaintiff had another appointment with Kruszewski, conveying to him all of the above, and with no discussion whatsoever, Kruszewski wrote Plaintiff a prescription for klonopin, to take 3 times a day with one refill. Klonopin is a highly addictive drug, a benzodiazepine, and was being prescribed by a doctor who was an alleged expert in

addiction medicine, and who had initially told Plaintiff that he was opposed to the use of all substances. Furthermore, the Plaintiff had already been dealing with a supposed substance abuse issue, that Kruszewski claimed Plaintiff could recover from, if he just attended the 12 step meetings. In reality, Plaintiff had been self-medicating with what is now recognized as one of the most effective treatments for PTSD.

49. Kruszewski never did any follow up with the bipolar issue or the lithium regimen, and never discussed the condition with Plaintiff, although Plaintiff did go for some blood testing during the short period of time he was taking the lithium.

50. The anxiety and suicidal feelings continued unabated, only ameliorated marginally when Plaintiff would take the klonopin, but there was no improvement whatsoever in Plaintiff's life. These circumstances were engineered by, in part, and fully known to Kruszewski.

51. Over the weekend of Easter 2005, Plaintiff went to stay with his sister's family. Plaintiff was suffering with PTSD/cortisol-induced anxiety so severely that he was nearly unable to function. His sister called Kruszewski in desperation, and he prescribed a large dose of phenobarbital, a barbiturate, with refills. There was no discussion, and no diagnosis ever communicated to Plaintiff, other than "substance abuse," despite recently obtained evidence that Kruszewski knew that he was suffering with severe chronic PTSD.

52. Several weeks later, when Plaintiff was back home in Harrisburg, and suffering with the same intense raging anxiety, Plaintiff again contacted Kruszewski, and told him how ill he felt.

53. Kruszewski drove over to Plaintiff's office, and took him to the Pennsylvania Medical Society.

54. Defendant Hobbs came down to the lobby, and asked two questions – whether it would help if Plaintiff had a woman, and whether Adderall or any other drugs Plaintiff could think of would help. Plaintiff responded no to both. Hobbs then got up from the table without saying another word, and left.

55. Defendant Kruszewski had mentioned Defendant Hobbs and/or other physicians of PMS that he had communicated and worked with during the course of Plaintiff's treatment, and it is believed that Kruszewski communicated with Hobbs and, perhaps others associated with PMS, both Plaintiff's conditions and treatment throughout Plaintiff's treatment with Kruszewski.

56. Both Kruszewski and Hobbs knew that Plaintiff had become involved romantically with a woman, who was also a doctor, in or around 2004, and that that relationship had broken off right around March, 2005.

57. Kruszewski then drove Plaintiff back to his law office, and left, without saying a word of any substance. Plaintiff communicated his suicidal ideation, and even actions toward that end, directly to Kruszewski, who did not say or do anything despite his clear obligation to do so.

58. Kruszewski communicated with Hobbs, and possibly others, including the professionals from Marworth, regarding Plaintiff's treatment. Upon information and belief, a decision was made for nefarious reasons, to not communicate the proper diagnosis to the Plaintiff.

59. Plaintiff's suffering was due to stress in response to the cortisol abnormality from PTSD; they were wholly physiological conditions, with related psychic suffering.

60. Kruszewski became a client of Plaintiff's colleague, and former law partner, Don Bailey, sometime in or around 2004 or 2005. As previously noted, Kruszewski seemed extraordinarily anxious to meet Mr. Bailey, when Plaintiff had first met with him.

61. Kruszewski disclosed details about Plaintiff's treatment to Mr. Bailey, and of other professionals he had treated in Harrisburg.

62. There is one physician of whom he revealed as having a cocaine problem, and he told Mr. Bailey and/or his wife that federal Judge John E. Jones was being treated by him for alcoholism, and issues associated with Judge Jones penis size.

63. At one point early on in Plaintiff's treatment, Kruszewski asked Plaintiff if he had any issues concerning his own penis size. He told Plaintiff this was a fairly common problem and that he was treating other professionals who had such issues. Plaintiff believes that Kruszewski had perverse motivations in wanting to discuss these issues.

64. Also, during one of the counseling sessions, Kruszewski claimed that he was an artist, and asked Plaintiff to model in the nude for him, apparently to satisfy his lewd and perverse curiosity regarding Plaintiff's male anatomy.

65. During another incident, Kruszewski delivered a stack of hardcore pornography magazines to Mr. Bailey, at the law office that he shared with Plaintiff. Neither Bailey nor Plaintiff looked at them, and it is believed that the magazines were discarded immediately.

66. Counseling sessions were held in Kruszewski's private home, where he lived with Defendant Tobiasz. Tobiasz often talked to Plaintiff about fixing him up with women and/or men.

67. During one visit, Tobiasz, who was the medical assistant, pressured Plaintiff to stay relatively late into the evening, telling him that a spectacular woman was coming up there to

meet Plaintiff. Plaintiff felt that there was something creepy about the intense desire to have Plaintiff fixed up with this woman, and Plaintiff stayed for a while only because he was made to feel obligated, but as soon as the woman arrived, Plaintiff did leave. It was late at night, and Kruszewski was in the house at the time.

68. Furthermore, over the course of Plaintiff's treatment, Kruszewski inappropriately suggested multiple times to the Plaintiff that he could sleep over and share a bedroom with Kruszewski's "son," who was a grown man. Kruszewski and Tobiasz, are both homosexual male lovers, and their "son" is also believed to be homosexual.

69. Plaintiff avers that he was being sexually harrassed or groomed by Kruszewski and Tobiasz, as they consistently appeared to be attempting to seduce Plaintiff, in his vulnerable state, into a sexual relationship.

70. Plaintiff made known to Kruszewski on many occasions that his friend and colleague, Don Bailey, and Plaintiff's closeness with Mr. Bailey's family, his wife, and their 6 children, was one of the only lifelines and social supports he had at the time.

71. It is believed and averred that part of Kruszewski's nefarious plan to seduce, hurt, and/or harm the Plaintiff, was to drive Plaintiff away from the Bailey family, leaving him with no emotional support in Harrisburg.

72. Kruszeski worked very hard to ingratiate himself to the Bailey family, buying gifts for the children, and inviting them over to his house socially and recreationally, and attempted to influence Bailey's wife, was also his secretary, telling her confidential, medical information, regarding the professionals and judges who were patients of his, as set forth above.

73. On one occasion, in or around mid-2005, Kruszewski told Bailey and his wife that they should not allow Plaintiff to be around their children, with the clear implication that Plaintiff was some threat of harm to children.

74. There is not a single word that Plaintiff ever uttered to Kruszewski, or a single thing ever discussed, that would ever have justified Kruszewski making such derogatory inferences, and Plaintiff believes Kruszewski did so to isolate Plaintiff from the only support system he had at the time.

75. Plaintiff believes and avers that Kruszewski was attempting to take away all of Plaintiff's personal relationships, so that he could manipulate Plaintiff into, inter alia, relying exclusively on Kruszewski to make Plaintiff more pliant and susceptible to Kruszewski's perverse intentions.

76. Bailey did not act on Kruszewski's suggestion, and continues to be a colleague and close personal friend of Plaintiff. Kruszewski shortly thereafter abruptly went to Bailey's office, and terminated their attorney/client relationship, without paying Bailey the amounts due and owing.

77. Plaintiff's PTSD diagnosis was withheld from him, and he was subjected to a continuous course of unethical, unprofessional, reckless and outrageous treatment, and was then abandoned by Kruszewski, and left in a severe state of psychic and physical distress, all due to the conduct as set forth above.

78. This unconscionable and disgraceful misconduct, and humiliation by Dr. Kruszewski, further traumatized the Plaintiff, causing him to struggle for a lengthy period of time thereafter, with intense depression, anxiety, and related extreme psychic suffering.

79. During the intervening period of time, again due solely and exclusively to the untreated and undiagnosed PTSD, which had been exacerbated to a severe degree as a result of the mistreatment by Kruszewski, Plaintiff, a sole civil rights law practitioner, experienced a professional lapse which was reported to the Pennsylvania licensing authorities.

80. Because of the type of work that Plaintiff had done, and because of his affiliation with Mr. Bailey, all as set forth at www.pennsylvaniacivilrightslawnetwork.com, formal disciplinary charges were initiated against the Plaintiff.

81. Because he did not know at the time that he suffered from PTSD, and that he had been deliberately mistreated by Kruszewski, Plaintiff accepted full and complete responsibility for the unintentional professional indiscretions that resulted from his medical condition. To put the matter behind him as quickly as possible, Plaintiff agreed to a stipulated set of facts and penalty with disciplinary counsel.

82. The stipulation of facts and penalty was rejected by the Supreme Court Disciplinary Board, and Plaintiff was made to go forward with a hearing on the charges, although they were, in retrospect, innocuous and caused harm to no one, as Plaintiff undertook diligent efforts, even in light of his condition, to protect the interest of his client.

83. Plaintiff was severely prejudiced at the time of the hearing, by not being able to put on any mitigating medical evidence, as a result of Kruszewski's deliberate withholding of the PTSD diagnosis, and subsequent course of mistreatment to which he subjected Plaintiff, and his abandonment of Plaintiff.

84. While the hearing panel adopted a position close to that agreed upon by the Plaintiff and Disciplinary Counsel, that decision was rejected by the full board, and a suspension of one year and one day was recommended, and later imposed by the Pennsylvania Supreme

Court. This deprived Plaintiff of his only means of income, precluding him from even having health insurance.

85. The primary reason given by the Supreme Court Disciplinary Board for the punishment Plaintiff received, was Plaintiff's failure to offer mitigating medical evidence to explain his condition that led to the professional issues, which, as alleged, Plaintiff was not able to do because of the abuse by Kruszewski.

86. Plaintiff has remained suspended, and has sought the reopening of his prior proceedings, which has been denied, and he will be undertaking efforts to have his license restored.

87. In or around January, 2013, it was revealed to Plaintiff by a reliable source, who provided him with a multitude of medical publications containing overwhelming confirmation that Plaintiff suffered from PTSD. This was later confirmed by Plaintiff's physician.

88. Plaintiff sent a written request for his medical records at the end of February or early March 2013 to Kruszewski's office.

89. On March 20, 2013, Plaintiff sent a follow-up letter, in response to a vague reply from Dr. Kruszewski, written by Defendant Tobiasz, that did not include his medical records or state whether or not they had been destroyed.

90. In response to the letter, Plaintiff received a repugnant and unprofessional response from attorney Defendant Meguirian, on behalf of Kruszewski, which contained false accusations, and was disseminated to others. Meguirian did not provide Plaintiff with his records or inform him as to whether they were maintained or destroyed.

91. Plaintiff never received any justification for the refusal to provide the records, which was attempted through appropriate methods, including multiple courteous calls to Meguirian's office.

92. Plaintiff was ultimately directed by Kruszewski to not contact him again concerning the medical records, threatening him with police involvement and criminal charges, so Plaintiff directed all communications to Meguirian, and specifically made him aware that he was seeking additional treatment, and to regain his licensure, for which he needed the records. They were not provided.

93. In or around July, 2013, Plaintiff was engaged in efforts toward service of a subpoena on Kruszewski in connection with Plaintiff's proceedings to get his prior disciplinary record opened, and Kruszewski had criminal trespass charges filed against Plaintiff.

94. Kruszewski later admitted while on the witness stand during an August 27, 2013 hearing to get his prior disciplinary record opened, that Kruszewski did, at all times, have the medical records. In fact, they were in Defendant Meguirian possession at the court, but they continued to refuse to give them to Plaintiff.

95. Kruszewski also lied under oath during the proceeding in an effort to further hurt and harm the Plaintiff.

96. Plaintiff prevailed on the hearing on the criminal trespass charge, and it was only after that charge, in November, 2013, that Plaintiff received the records from Meguirian, subsequent to interrogating Kruszewski on the witness stand in the Federal Court in Williamsport, during Plaintiff's disciplinary hearing. Plaintiff was not able to present the evidence needed to regain his license at that time.

97. The records specifically contain the mention of PTSD as a diagnosis in a request for admittance to Marworth. Neither this correspondence, nor the PTSD diagnosis, were ever shared with Plaintiff.

98. Upon information and belief, additional records have been withheld from Plaintiff, and the records he did receive have been altered.

99. Kruszewski, Tobiasz, Hobbs, and their associates at Marworth and the Pennsylvania Medical Society knew that Plaintiff was suffering from this chronic condition, and deliberately failed to disclose it to the Plaintiff for the lewd, lascivious, and/or other illicit purposes as detailed above.

COUNT I

100. Paragraphs 1 through 99 are hereby incorporated by reference.

101. Plaintiff alleges that Defendants Kruszewski, Tobiasz, Hobbs, PMS and its foundation, and one of more of the John Doe defendants, and later Defendant Meuirian, engaged in various particulars, primarily under the direction and control of Kruszewski, in a course of conduct that was intended to, and did, cause Plaintiff severe emotional distress and extreme deterioration of his well-being and living conditions.

102. The actions and conduct of the various Defendants, as set forth above, was extreme, reckless, and outrageous, and beyond the bounds of a civilized society, and was specifically intended to, and did, cause Plaintiff severe and extreme emotional distress.

103. The actions and conduct of the Defendants as alleged herein constitute violations of Plaintiff's rights under Pennsylvania state law, constitute the tort of intentional infliction of emotional distress, and have caused Plaintiff serious personal losses, such as the loss of his marriage, the loss of his law license, the loss of income, the loss of the ability to maintain his

standard of living, the loss of his professional and personal reputation, together with serious emotional upset, aggravation and inconvenience, for all of which damages, together with punitive damages, Defendants are liable.

104. All of these Defendants engaged in a conspiracy among and between them in order to cause the harm to the Plaintiff as aforesaid.

WHEREFORE, Plaintiff demands judgment in his favor and against the Defendants, for the damages and injuries resulting from the foregoing violations together with punitive damages as permitted by law and damages for emotional distress, in the amount of \$50,000,000 along with costs of suit, attorney fees and all other relief as this Court determines to be just and proper.

COUNT II

105. Paragraphs 1 through 104 are hereby incorporated by reference.

106. Plaintiff alleges that Defendants Kruszewski, Tobiasz, Hobbs, PMS and its foundation, and one of more of the John Doe defendants, and later Defendant Meguirian, engaged in various particulars, primarily under the direction and control of Kruszewski, in a course of conduct that constituted violations of Plaintiff's right to privacy in violation of Pennsylvania law.

107. The actions and conduct of the Defendants as alleged herein have caused Plaintiff serious personal losses, such as the loss of his marriage, the loss of his law license, the loss of income, the loss of the ability to maintain his standard of living, the loss of his professional and personal reputation, together with serious emotional upset, aggravation and inconvenience, for all of which damages, together with punitive damages, Defendants are liable.

108. All of these Defendants engaged in a conspiracy among and between them in order to cause the harm to the Plaintiff as aforesaid.

WHEREFORE, Plaintiff demands judgment in his favor and against the Defendants, for the damages and injuries resulting from the foregoing violations together with punitive damages as permitted by law and damages for emotional distress, in the amount of \$50,000,000 along with costs of suit, attorney fees and all other relief as this court deems just and proper.

COUNT III

109. Paragraphs 1 through 108 are hereby incorporated by reference.

110. From and after 2013 through the present, Defendants Meguirian, Tobiasz, and Kruszewski have all published false and defamatory information about the Plaintiff to third persons, including statements that Plaintiff is a liar, that he has engaged in criminal misconduct, and that he has made threats of physical harm to Kruszewski.

111. All of the statements of these Defendants were false, and made with knowledge of their falsity, and were communicated to third persons with the specific intent to hurt and harm the Plaintiff, and damage his reputation.

112. The actions and conduct of the Defendants as alleged herein constitute violations of Plaintiff's rights under Pennsylvania state defamation law, and have caused Plaintiff personal losses and damage to his reputation, together with emotional upset, aggravation and inconvenience, for all of which damages, together with punitive damages, Defendants are liable.

WHEREFORE, Plaintiff demands judgment in his favor and against the Defendants, for the damages and injuries resulting from the foregoing violations under Pennsylvania law, together with punitive damages as permitted by law and damages for his reputational injury, emotional distress, and other compensable losses, in the amount of \$5,000,000, along with costs of suit, attorney fees and all other relief as this Court determines to be just and proper.

COUNT IV

113. Paragraphs 1 through 112 are hereby incorporated by reference.

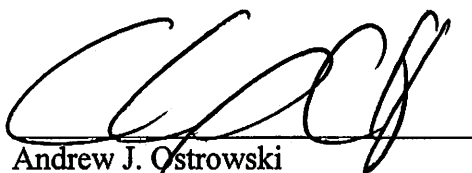
114. From and after February, 2013 through the present, and ongoing, Defendants Meguirian, Tobiasz, Kruszewski, and, perhaps, others, have engaged in a course of conduct, as set forth above, through the wrongful withholding of Plaintiff's medical records, defamation of Plaintiff's character, and initiation of bogus criminal charges against the Plaintiff that was intended to and did interfere with Plaintiff's rights under law, including his right to seek proper treatment for his PTSD condition, the interference with his ability to pursue the occupation of his choosing, and to engage in these and other business pursuits.

115. The actions and conduct of the Defendants as aforesaid have constituted an actionable interference with the Plaintiff's rights under the law, and have cause personal losses, damages and injuries to the Plaintiff, and impeded his pursuit of his personal affairs, and damage to his reputation, together with emotional upset, aggravation and inconvenience, for all of which damages, together with punitive damages, Defendants are liable.

116. All of these Defendants engaged in a conspiracy among and between them in order to cause the harm to the Plaintiff as aforesaid.

WHEREFORE, Plaintiff demands judgment in his favor and against the Defendants, for the damages and injuries resulting from the foregoing violations under Pennsylvania law, together with punitive damages as permitted by law and damages for his reputational injury, emotional distress, and other compensable losses, in the amount of \$5,000,000, along with costs of suit, attorney fees and all other relief as this Court determines to be just and proper.

Respectfully submitted,

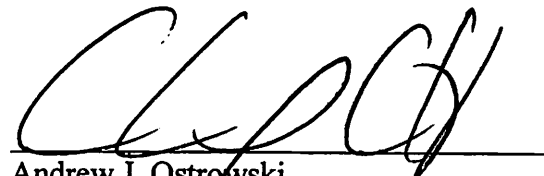
A handwritten signature in black ink, appearing to read 'A. Ostrowski', is written over a horizontal line.

Andrew J. Ostrowski
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500 or 717-571-1818
<http://www.andyostrowski.com/>

Dated: January 31, 2014

VERIFICATION

I, Andrew J. Ostrowski, hereby state that I am the Plaintiff herein and that I have reviewed the foregoing Complaint, and that the facts stated therein are true and correct to the best of my knowledge, information and belief; and, that this statement is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, and any other such penalties for unsworn falsifications.



Andrew J. Ostrowski

Dated: January 31, 2014