

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

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

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. 30121009696
Amount Claimed: \$36,000.00
BALANCE/RDUM Y
TIME 00:00
BY ACTION

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.

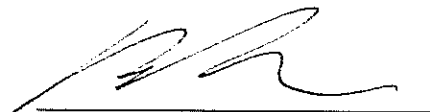
9. Defendant WA-Lincolnwood has not paid the \$36,000.00 fine assessed in the Department's Final Administrative Order or any portion thereof.

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

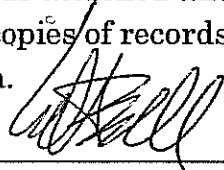
LISA MADIGAN
Illinois Attorney General
Revenue Litigation Bureau
100 W. Randolph St., Rm. 13-210
Chicago, IL 60601
(312) 814-2497
Atty. No. 99000

State of Illinois |
County of Cook | SS:

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

