

3/21/2025 12:02 PM
By: AL

IN THE CIRCUIT COURT OF SIXTH JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS

Susan W. McGee
CLERK OF THE CIRCUIT COURT
CHAMPAIGN COUNTY, ILLINOIS

JANE DOE,)
)
Plaintiff,)
)
v.)
)
KEITH REISINGER-KINDLE and)
EQUITY CLINIC, S.C.,)
Defendants.)

No. 2025LA000054
Amount Claimed >\$50,000.00
PLAINTIFF DEMANDS A
TRIAL BY JURY

COMPLAINT AT LAW

NOW COMES the Plaintiff, JANE DOE, by and through her attorneys, LAW OFFICES OF RICHARD M. CRAIG, P.C., and complaining of the Defendants KEITH REISINGER-KINDLE and EQUITY CLINIC, S.C., states as follows:

Facts Relevant to All Counts

1. On and after April 1, 2023, and at all times material, Defendant KEITH REISINGER-KINDLE (hereinafter "KINDLE") was a physician licensed to practice his profession in the State of Illinois, and who held himself out to members of the public, including the Plaintiff JANE DOE, as having specialized training and expertise in performing elective termination of pregnancies.

2. On and after April 1, 2023, and at all times material, Defendant EQUITY CLINIC, S.C. (hereinafter "EQUITY CLINIC") owned, operated, managed, maintained and controlled an abortion clinic located at 2111 West Park Court in the City of Champaign, County of Campaign, State of Illinois.

3. On and after April 1, 2023, and at all times material, EQUITY CLINIC employed various physicians, including KINDLE, as well as nurses and other medical care personnel,

including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown], comprising a single, organized medical staff operating within its abortion-providing clinic in the City of Champaign, County of Champaign, State of Illinois.

4. On April 1, 2023, Plaintiff presented to EQUITY CLINIC for an elective Dilation and Evacuation procedure (hereinafter “the Abortion”) and the abortion procedure was initiated when KINDLE administered a paracervical block and placed four Dilapan-S cervical dilators in her cervix. The Abortion procedure was then scheduled to continue the following day.

5. On April 2, 2023, Plaintiff again came under the care and treatment of KINDLE as well as, on information and belief, nurses at EQUITY CLINIC Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] for the Abortion.

6. During the Abortion procedure on April 2, 2023, KINDLE performed a uterine examination to confirm size and shape, and found that the uterus was anteverted. He removed the cervical dilators and administered a paracervical block. The uterine contents were then evacuated with the combination of a 15 suction catheter and the use of a Sopher clamp under ultrasound guidance.

7. During the course of the abortion procedure, neither KINDLE nor any other medical professional at EQUITY CLINIC administered digoxin or any other medication into the fetal heart to induce fetal demise prior to the procedure commencing.

8. During the Abortion on April 2, 2023, KINDLE perforated Plaintiff’s uterus.

9. Following the Abortion, KINDLE caused to be generated a note stating that a final pass with a suction curette confirmed that the uterus was empty, and that “[p]roducts of conception were visibly inspected and confirmed to be complete.” Plaintiff was thereafter discharged.

10. On April 3, 2023, at approximately 11:37 a.m., Plaintiff called EQUITY CLINIC reporting heavy cramping. Medical personnel instructed her to take Ibuprofen or Tylenol in response to the same.

11. Approximately five (5) hours later, on April 3, 2023, Plaintiff again called EQUITY CLINIC to advise that she had taken Ibuprofen with limited relief, but that “her bottom has a lot of pressure and it is hard to breathe.” The message was relayed to KINDLE, who advised her to take a laxative.

12. On April 4, 2023, Plaintiff again called EQUITY CLINIC to advise that she took two doses of a laxative the evening prior but had not had a bowel movement, and that her abdominal cramping had increased. Plaintiff was advised to take an enema and consider presenting at an urgent care facility or to an emergency room.

13. Later on April 4, 2023, Plaintiff presented to Community Hospital South Emergency Room in Indianapolis, Indiana, where she underwent an exploratory laparotomy and, when the remains of “half of a deceased pre-born human being” were found in her right pelvis, a surgical removal of the fetal remains occurred. Additionally, pieces of the fetal skull that were adherent to the patient’s intestine were removed piecemeal. The perforation of the uterus was also addressed.

14. On April 5, 2023, the general surgeon, Stephen Joseph O’Neil, MD, who had assisted in the laparotomy called KINDLE to report the findings of that laparotomy and that a removal of fetal remains had been performed. KINDLE refused to answer any questions or provide any information to Dr. Stephen Joseph O’Neil about the Abortion procedure, claiming lack of consent from Plaintiff.

15. Later on April 5, 2023, KINDLE spoke with Plaintiff, but did not request permission to discuss the Abortion with Plaintiff's surgeon and did not advise Plaintiff that the surgeon, Dr. Stephen Joseph O'Neil, had called him requesting information about the same (hereinafter "the April 5th Conversation").

16. During the April 5th Conversation, Plaintiff asked whether her pre-born child was a boy or a girl. KINDLE responded by stating that he would look again to see if he could identify the sex of the child.

17. When KINDLE advised and assured Plaintiff on April 5, 2023, that he would "look again" to determine the sex of her fetus, he knew that it was impossible at that point to determine the pre-born child's sex because whatever fetal remains had been removed from Plaintiff had already been discarded.

COUNT I

Medical Negligence v. Keith Reisinger-Kindle

18. For Paragraph 18 of Count I, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

19. On and after April 1, 2023, and at all times material, KINDLE had a duty to exercise reasonable care in connection with his care and treatment of Plaintiff.

20. On and after April 1, 2023, and at all times material, KINDLE was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;
- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;

- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

21. As a proximate result of one or more of the above referenced negligent acts and/or omissions by KINDLE, Plaintiff suffered damages of a personal and pecuniary nature, including but not limited to psychiatric damages and physical damages that will affect her ability to carry and deliver children for the rest of her life.

22. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant KEITH REISINGER-KINDLE in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00).

COUNT II

Negligent Infliction of Emotional Distress v. Keith Reisinger-Kindle

23. For Paragraph 23 of Count II, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

24. On and after April 1, 2023, and at all times material, KINDLE had a duty to exercise reasonable care in connection with his care and treatment of Plaintiff.

25. On and after April 1, 2023, and at all times material, KINDLE was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;

- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;
- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

26. As a proximate result of one or more of the above referenced negligent acts and/or omissions by KINDLE, Plaintiff has experienced and will continue to experience extreme and irreversible emotional distress, and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

27. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

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COUNT III

Medical Negligence v. Equity Clinic

28. For Paragraph 28 of Count III, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

29. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown],

Caitlin [last name unknown] and Taylor [last name unknown], had a duty to exercise reasonable care in connection with its care and treatment of Plaintiff.

30. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown], was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;
- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;
- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

31. As a proximate result of one or more of the above referenced negligent acts and/or omissions by EQUITY CLINIC, Plaintiff suffered damages of a personal and pecuniary nature, including but not limited to psychiatric damages and physical damages that will affect her ability to carry and deliver children for the rest of her life.

32. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant EQUITY CLINIC, S.C., in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00).

COUNT IV

Negligent Infliction of Emotional Distress v. Equity Clinic

33. For Paragraph 33 of Count IV, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

34. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] had a duty to exercise reasonable care in connection with his care and treatment of Plaintiff.

35. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;
- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;
- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

36. As a proximate result of one or more of the above referenced negligent acts and/or omissions by EQUITY CLINIC, Plaintiff has experienced and will continue to experience extreme and irreversible emotional distress, and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

37. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant EQUITY CLINIC, S.C. in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00).

COUNT V

Intentional Infliction of Emotional Distress v. Keith Reisinger-Kindle

38. For Paragraph 38 of Count V, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

39. On April 5, 2023, KINDLE knew or should have known that telling Plaintiff that he would "look again" to determine the sex of her pre-born child, despite that such a determination was at that point forever beyond any person's ability to ascertain, would create extreme emotion distress in Plaintiff.

40. On April 5, 2023, KINDLE's conduct in telling Plaintiff that he would "look again" to determine the sex of her pre-born child despite his knowledge that such a determination was at

that point forever beyond any person's ability to ascertain, was outrageous, exceeded all bounds of human decency, and is intolerable in a civilized society.

41. On and after April 5, 2023, KINDLE's conduct caused Plaintiff experience severe emotional distress.

42. As a direct, proximate and foreseeable result of one or more of the foregoing wrongful acts and omissions by KINDLE, Plaintiff has and will continue to experience irreversible suffering and emotional damages. The plaintiff has and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant KEITH REISINGER-KINDLE in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00)

LAW OFFICES OF RICHARD M. CRAIG, P.C.

By:



One of the Attorneys for Plaintiff
JANE DOE

Richard M. Craig
Law Offices of Richard M. Craig, P.C.
134 N. LaSalle Street, Suite 1206
Chicago, Illinois 60602
312/253-4500
Firm No. 37809
rcraig@richcraiglaw.com

February 27, 2025

Richard Craig, Esq.
Offices of Richard M. Craig, PC
134 North LaSalle Street
Suite 1330
Chicago, IL 60602



Mr. Craig,

At your request, I have reviewed a series of medical records documenting care received by [REDACTED] relating to an abortion in April 2023. I am a board-certified obstetrician gynecologist with over 35 years of clinical practice experience that includes performing over 1000 first and second-trimester surgical abortions including 120 suction D&E procedures up to 24 weeks gestation that is the issue of this case. I am currently licensed to practice medicine in the state of Arizona and serve as an adjunct professor of Obstetrics and Gynecology at an osteopathic medical school.

[REDACTED] presented to Equity Clinic located at 2111 West Park Court in Champaign, IL on 4/1/2023 seeking an abortion. Her previous obstetrical history included four full-term deliveries and one spontaneous abortion (miscarriage). Her gestational age on 4/1/2023 was calculated to be 22 weeks 2 days gestation based on an ultrasound that found her to be 18 weeks 5 days on 3/7/2023. She was counselled and scheduled for a D&E (dilation and evacuation) abortion procedure the following day. She was seen by Keith Reisinger Kindle, DO and signed a consent form that lists possible complications including hemorrhage, infection and injury "to organs/structures in the body". Dr. Kindle placed four Dilapan-S cervical dilators in the cervix after administration of a paracervical block with a 25cc blood loss with no apparent problems.

She returned to the clinic on 4/2/2023 at 0900 for her abortion procedure. The notes state that she had no issues the night before. She was brought to the procedure room at 1018, and conscious sedation was administered at 1029. Dr. Kindle's notes state that a uterine exam was

performed to confirm size and shape. The uterus was found to be anteverted. The cervical dilators were removed, and the cervix was found to be 3 cm dilated. A paracervical block with vasopressin was administered. A size-15 suction catheter was utilized to perform amniotomy. The uterine contents were evacuated with a combination of suction and use of a Sopher clamp under ultrasound guidance. His notes state that a final pass with a suction curette confirmed that the uterus was empty. She was treated with methergine, tranexamic acid, misoprostol and uterine massage to control and minimize postoperative bleeding. Estimated blood loss for the procedure was 250 cc. The record states that, "Products of conception were visually inspected and confirmed to be complete." She was discharged without incident.

The patient called the clinic back the following day, 4/3/2023 at 1137 with complaint of heavy cramping. She was advised that this was normal and instructed to use Ibuprofen and Tylenol and advised of other methods to decrease the discomfort. A follow-up call was made about five hours later. [REDACTED] noted that the ibuprofen was helping some but "her bottom has a lot of pressure and it is hard to breathe." The call was transferred to Dr. Kindle but there are no additional notes documenting his discussion with the patient, if any. The patient called back again on 4/4/2023 stating that she took two doses of a laxative the night before but had not had a bowel movement. Her abdominal cramping had increased with laxative use. She had no complaints of increased vaginal bleeding, discharge or fever. It was suggested that she take an enema and consider going to an urgent care or emergency room if no improvement was seen. The patient's mother called again on 4/4/2023 (no time noted) and stated that [REDACTED] had presented to an emergency room where an "ectopic pregnancy" was found, and she was being brought to surgery. Dr. Kindle asked for contact information for the surgeon to provide additional history.

The patient presented to the emergency room at Community Hospital in Indianapolis on 4/4/2023 with complaint of lower abdominal pain. CBC showed an elevated WBC (white blood count) of 23,700 with a hemoglobin/hematocrit of 10.3 and 31.1. On exam, the abdomen was soft and tender with moderate distension. Bowel sounds were present. CT scan of the abdomen and pelvis revealed the uterus was diffusely enlarged consistent with the abortion procedure she had two days before. Dorsal to the uterus was a fetal skeleton with free air in the abdomen and changes suggestive of intra-abdominal infection. She was taken to surgery by Debra Larkins, DO and Stephen Joseph O'Neil, MD. An exploratory laparotomy was performed. The operative note states the following. "The patient was found to have half of a deceased pre-born human being in the right pelvis of the patient with evidence of severe and intentional trauma. The baby's body was transected at the pelvis with no legs or feet present. Stumps of both femurs extended from the soft tissue of the torso. The upper extremities were missing from elbow distally on both sides. The skull was crushed and no brain was present. The face was non-recognizable. ... There were small bony fragments in the mother's pelvis. There was a hole in the posterolateral inferior aspect of the right uterus, which was approximately the size of a quarter to half dollar. ... There was baby skull that was adherent to the patient's ileum." No

bowel or bladder injury was found. The fetal remains were removed and the uterus repaired.

 made an uneventful recovery and was discharged on 4/9/2023.


It is my professional opinion to a reasonable degree of medical certainty that Dr. Keith Reisinger Kindle deviated from a reasonable standard of care in the following ways:

- Causing a perforation of the uterus.

- Failing to recognize that a perforation of the uterus had occurred during the suction D&E procedure.

- Failing to adequately examine the fetal parts obtained during the suction D&E procedure.

Subsequent surgery demonstrated that a large portion of the fetus's body was not removed during the abortion procedure. Dr. Kindle expressly stated in his notes that, "Products of conception were visually inspected and confirmed to be complete." Had Dr. Kindle performed an adequate exam of the remains, it should have been obvious that fetal parts were left behind. Given that he was certain that the uterine cavity was empty, it should have been evident that a perforation had occurred, and appropriate remedial steps could have been taken.

As a result of these deviations from a reasonable standard of care,  had to undergo an exploratory laparotomy and sustained other damages. Also, as the integrity of the endometrium has been disrupted, any subsequent delivery of this patient may have to be performed via cesarean section.

Very truly yours,



**IN THE CIRCUIT COURT OF SIXTH JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS**

JANE DOE,)	
)	
Plaintiff,)	
)	No.
v.)	
)	Amount Claimed >\$50,000.00
KEITH REISINGER-KINDLE and)	
EQUITY CLINIC, S.C.,)	PLAINTIFF DEMANDS A
)	TRIAL BY JURY
Defendants.)	

AFFIDAVIT

I, RICHARD M. CRAIG, being first duly sworn on oath depose and state as follows:


1. That I have consulted and reviewed the facts of the above-entitled case with a licensed physician whom I reasonably believe:
 - a. is knowledgeable in the relevant issues involved in this particular action;
 - b. practices in the same area of medicine that is at issue in the particular action; and
 - c. is qualified by experience or have demonstrated competence in the subject of this case.

2. That the reviewing health care professional has determined after a review of the medical records and other relevant material involved in this said action that there is a reasonable and meritorious cause for the filing of this action.

FURTHER AFFIANT SAITH NOT.

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

LAW OFFICES OF RICHARD M. CRAIG, P.C.

By: 

One of the Attorneys for Plaintiff
JANE DOE

Richard M. Craig
Law Offices of Richard M. Craig, P.C.
134 N. LaSalle Street, Suite 1206
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ARDC No. 6211342
rcraig@richcraiglaw.com

IN THE CIRCUIT COURT OF SIXTH JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS

Susan W. McGee
CLERK OF THE CIRCUIT COURT
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JANE DOE,

Plaintiff,

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No. 2025LA000054

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Facts Relevant to All Counts

1. On and after April 1, 2023, and at all times material, Defendant KEITH REISINGER-KINDLE (hereinafter "KINDLE") was a physician licensed to practice his profession in the State of Illinois, and who held himself out to members of the public, including the Plaintiff JANE DOE, as having specialized training and expertise in performing elective termination of pregnancies.

2. On and after April 1, 2023, and at all times material, Defendant EQUITY CLINIC, S.C. (hereinafter "EQUITY CLINIC") owned, operated, managed, maintained and controlled an abortion clinic located at 2111 West Park Court in the City of Champaign, County of Campaign, State of Illinois.

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including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown], comprising a single, organized medical staff operating within its abortion-providing clinic in the City of Champaign, County of Champaign, State of Illinois.

4. On April 1, 2023, Plaintiff presented to EQUITY CLINIC for an elective Dilation and Evacuation procedure (hereinafter “the Abortion”) and the abortion procedure was initiated when KINDLE administered a paracervical block and placed four Dilapan-S cervical dilators in her cervix. The Abortion procedure was then scheduled to continue the following day.

5. On April 2, 2023, Plaintiff again came under the care and treatment of KINDLE as well as, on information and belief, nurses at EQUITY CLINIC Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] for the Abortion.

6. During the Abortion procedure on April 2, 2023, KINDLE performed a uterine examination to confirm size and shape, and found that the uterus was anteverted. He removed the cervical dilators and administered a paracervical block. The uterine contents were then evacuated with the combination of a 15 suction catheter and the use of a Sopher clamp under ultrasound guidance.

7. During the course of the abortion procedure, neither KINDLE nor any other medical professional at EQUITY CLINIC administered digoxin or any other medication into the fetal heart to induce fetal demise prior to the procedure commencing.

8. During the Abortion on April 2, 2023, KINDLE perforated Plaintiff’s uterus.

9. Following the Abortion, KINDLE caused to be generated a note stating that a final pass with a suction curette confirmed that the uterus was empty, and that “[p]roducts of conception were visibly inspected and confirmed to be complete.” Plaintiff was thereafter discharged.

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13. Later on April 4, 2023, Plaintiff presented to Community Hospital South Emergency Room in Indianapolis, Indiana, where she underwent an exploratory laparotomy and, when the remains of “half of a deceased pre-born human being” were found in her right pelvis, a surgical removal of the fetal remains occurred. Additionally, pieces of the fetal skull that were adherent to the patient’s intestine were removed piecemeal. The perforation of the uterus was also addressed.

14. On April 5, 2023, the general surgeon, Stephen Joseph O’Neil, MD, who had assisted in the laparotomy called KINDLE to report the findings of that laparotomy and that a removal of fetal remains had been performed. KINDLE refused to answer any questions or provide any information to Dr. Stephen Joseph O’Neil about the Abortion procedure, claiming lack of consent from Plaintiff.

15. Later on April 5, 2023, KINDLE spoke with Plaintiff, but did not request permission to discuss the Abortion with Plaintiff's surgeon and did not advise Plaintiff that the surgeon, Dr. Stephen Joseph O'Neil, had called him requesting information about the same (hereinafter "the April 5th Conversation").

16. During the April 5th Conversation, Plaintiff asked whether her pre-born child was a boy or a girl. KINDLE responded by stating that he would look again to see if he could identify the sex of the child.

17. When KINDLE advised and assured Plaintiff on April 5, 2023, that he would "look again" to determine the sex of her fetus, he knew that it was impossible at that point to determine the pre-born child's sex because whatever fetal remains had been removed from Plaintiff had already been discarded.

COUNT I

Medical Negligence v. Keith Reisinger-Kindle

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- d. Failed to provide adequate post-abortion care;
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26. As a proximate result of one or more of the above referenced negligent acts and/or omissions by KINDLE, Plaintiff has experienced and will continue to experience extreme and irreversible emotional distress, and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

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Medical Negligence v. Equity Clinic

28. For Paragraph 28 of Count III, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

29. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown],

Caitlin [last name unknown] and Taylor [last name unknown], had a duty to exercise reasonable care in connection with its care and treatment of Plaintiff.

30. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown], was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;
- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;
- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

31. As a proximate result of one or more of the above referenced negligent acts and/or omissions by EQUITY CLINIC, Plaintiff suffered damages of a personal and pecuniary nature, including but not limited to psychiatric damages and physical damages that will affect her ability to carry and deliver children for the rest of her life.

32. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant EQUITY CLINIC, S.C., in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00).

COUNT IV

Negligent Infliction of Emotional Distress v. Equity Clinic

33. For Paragraph 33 of Count IV, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

34. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] had a duty to exercise reasonable care in connection with his care and treatment of Plaintiff.

35. On and after April 1, 2023, and at all times material, EQUITY CLINIC, by and through its employee physician KINDLE and, on information and belief, by and through its nurses and other medical care personnel, including on information and belief Jenna [last name unknown], Caitlin [last name unknown] and Taylor [last name unknown] was negligent in one or more of the following respects:

- a. Causing a perforation of the uterus;
- b. Failing to recognize that a perforation of the uterus had occurred during the suction dilation and evacuation procedure;
- c. Failing to adequately examine the fetal parts obtained during the dilation and evacuation procedure;
- d. Failed to provide adequate post-abortion care;
- e. Was otherwise careless and negligent.

36. As a proximate result of one or more of the above referenced negligent acts and/or omissions by EQUITY CLINIC, Plaintiff has experienced and will continue to experience extreme and irreversible emotional distress, and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

37. Attached hereto and made a part hereof is an affidavit of Plaintiff's counsel and a medical report from a reviewing healthcare professional submitted pursuant to §2-622 of the Illinois Code of Civil Procedure (735 ILCS 5/2-622).

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant EQUITY CLINIC, S.C. in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00).

COUNT V

Intentional Infliction of Emotional Distress v. Keith Reisinger-Kindle

38. For Paragraph 38 of Count V, Plaintiff reasserts and realleges paragraphs one (1) through seventeen (17) of the Allegations Common to All Counts as if fully set forth herein.

39. On April 5, 2023, KINDLE knew or should have known that telling Plaintiff that he would "look again" to determine the sex of her pre-born child, despite that such a determination was at that point forever beyond any person's ability to ascertain, would create extreme emotion distress in Plaintiff.

40. On April 5, 2023, KINDLE's conduct in telling Plaintiff that he would "look again" to determine the sex of her pre-born child despite his knowledge that such a determination was at

that point forever beyond any person's ability to ascertain, was outrageous, exceeded all bounds of human decency, and is intolerable in a civilized society.

41. On and after April 5, 2023, KINDLE's conduct caused Plaintiff experience severe emotional distress.

42. As a direct, proximate and foreseeable result of one or more of the foregoing wrongful acts and omissions by KINDLE, Plaintiff has and will continue to experience irreversible suffering and emotional damages. The plaintiff has and will continue to incur medical expenses in treating her emotional injuries, and has and will continue to be unable to attend to her usual and customary affairs of life as a result of her emotional injuries.

PLAINTIFF DEMANDS A TRIAL BY JURY

WHEREFORE, the Plaintiff, JANE DOE demands judgment be entered against the Defendant KEITH REISINGER-KINDLE in an amount in excess of the jurisdictional minimum of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00)

LAW OFFICES OF RICHARD M. CRAIG, P.C.

By:



One of the Attorneys for Plaintiff
JANE DOE

Richard M. Craig
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February 27, 2025

Richard Craig, Esq.
Offices of Richard M. Craig, PC
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[REDACTED]

Mr. Craig,

At your request, I have reviewed a series of medical records documenting care received by [REDACTED] relating to an abortion in April 2023. I am a board-certified obstetrician gynecologist with over 35 years of clinical practice experience that includes performing over 1000 first and second-trimester surgical abortions including 120 suction D&E procedures up to 24 weeks gestation that is the issue of this case. I am currently licensed to practice medicine in the state of Arizona and serve as an adjunct professor of Obstetrics and Gynecology at an osteopathic medical school.

[REDACTED] presented to Equity Clinic located at 2111 West Park Court in Champaign, IL on 4/1/2023 seeking an abortion. Her previous obstetrical history included four full-term deliveries and one spontaneous abortion (miscarriage). Her gestational age on 4/1/2023 was calculated to be 22 weeks 2 days gestation based on an ultrasound that found her to be 18 weeks 5 days on 3/7/2023. She was counselled and scheduled for a D&E (dilation and evacuation) abortion procedure the following day. She was seen by Keith Reisinger Kindle, DO and signed a consent form that lists possible complications including hemorrhage, infection and injury "to organs/structures in the body". Dr. Kindle placed four Dilapan-S cervical dilators in the cervix after administration of a paracervical block with a 25cc blood loss with no apparent problems.


She returned to the clinic on 4/2/2023 at 0900 for her abortion procedure. The notes state that she had no issues the night before. She was brought to the procedure room at 1018, and conscious sedation was administered at 1029. Dr. Kindle's notes state that a uterine exam was

performed to confirm size and shape. The uterus was found to be anteverted. The cervical dilators were removed, and the cervix was found to be 3 cm dilated. A paracervical block with vasopressin was administered. A size-15 suction catheter was utilized to perform amniotomy. The uterine contents were evacuated with a combination of suction and use of a Sopher clamp under ultrasound guidance. His notes state that a final pass with a suction curette confirmed that the uterus was empty. She was treated with methergine, tranexamic acid, misoprostol and uterine massage to control and minimize postoperative bleeding. Estimated blood loss for the procedure was 250 cc. The record states that, "Products of conception were visually inspected and confirmed to be complete." She was discharged without incident.

The patient called the clinic back the following day, 4/3/2023 at 1137 with complaint of heavy cramping. She was advised that this was normal and instructed to use Ibuprofen and Tylenol and advised of other methods to decrease the discomfort. A follow-up call was made about five hours later. [REDACTED] noted that the ibuprofen was helping some but "her bottom has a lot of pressure and it is hard to breathe." The call was transferred to Dr. Kindle but there are no additional notes documenting his discussion with the patient, if any. The patient called back again on 4/4/2023 stating that she took two doses of a laxative the night before but had not had a bowel movement. Her abdominal cramping had increased with laxative use. She had no complaints of increased vaginal bleeding, discharge or fever. It was suggested that she take an enema and consider going to an urgent care or emergency room if no improvement was seen. The patient's mother called again on 4/4/2023 (no time noted) and stated that [REDACTED] had presented to an emergency room where an "ectopic pregnancy" was found, and she was being brought to surgery. Dr. Kindle asked for contact information for the surgeon to provide additional history.

The patient presented to the emergency room at Community Hospital in Indianapolis on 4/4/2023 with complaint of lower abdominal pain. CBC showed an elevated WBC (white blood count) of 23,700 with a hemoglobin/hematocrit of 10.3 and 31.1. On exam, the abdomen was soft and tender with moderate distension. Bowel sounds were present. CT scan of the abdomen and pelvis revealed the uterus was diffusely enlarged consistent with the abortion procedure she had two days before. Dorsal to the uterus was a fetal skeleton with free air in the abdomen and changes suggestive of intra-abdominal infection. She was taken to surgery by Debra Larkins, DO and Stephen Joseph O'Neil, MD. An exploratory laparotomy was performed. The operative note states the following. "The patient was found to have half of a deceased pre-born human being in the right pelvis of the patient with evidence of severe and intentional trauma. The baby's body was transected at the pelvis with no legs or feet present. Stumps of both femurs extended from the soft tissue of the torso. The upper extremities were missing from elbow distally on both sides. The skull was crushed and no brain was present. The face was non-recognizable. ... There were small bony fragments in the mother's pelvis. There was a hole in the posterolateral inferior aspect of the right uterus, which was approximately the size of a quarter to half dollar. ... There was baby skull that was adherent to the patient's ileum." No

bowel or bladder injury was found. The fetal remains were removed and the uterus repaired.

 made an uneventful recovery and was discharged on 4/9/2023.


It is my professional opinion to a reasonable degree of medical certainty that Dr. Keith Reisinger Kindle deviated from a reasonable standard of care in the following ways:

- Causing a perforation of the uterus.

- Failing to recognize that a perforation of the uterus had occurred during the suction D&E procedure.

- Failing to adequately examine the fetal parts obtained during the suction D&E procedure.

Subsequent surgery demonstrated that a large portion of the fetus's body was not removed during the abortion procedure. Dr. Kindle expressly stated in his notes that, "Products of conception were visually inspected and confirmed to be complete." Had Dr. Kindle performed an adequate exam of the remains, it should have been obvious that fetal parts were left behind. Given that he was certain that the uterine cavity was empty, it should have been evident that a perforation had occurred, and appropriate remedial steps could have been taken.

As a result of these deviations from a reasonable standard of care,  had to undergo an exploratory laparotomy and sustained other damages. Also, as the integrity of the endometrium has been disrupted, any subsequent delivery of this patient may have to be performed via cesarean section.

Very truly yours,



**IN THE CIRCUIT COURT OF SIXTH JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS**

JANE DOE,)	
)	
Plaintiff,)	
)	No.
v.)	
)	Amount Claimed >\$50,000.00
KEITH REISINGER-KINDLE and)	
EQUITY CLINIC, S.C.,)	PLAINTIFF DEMANDS A
)	TRIAL BY JURY
Defendants.)	

AFFIDAVIT

I, RICHARD M. CRAIG, being first duly sworn on oath depose and state as follows:


1. That I have consulted and reviewed the facts of the above-entitled case with a licensed physician whom I reasonably believe:
 - a. is knowledgeable in the relevant issues involved in this particular action;
 - b. practices in the same area of medicine that is at issue in the particular action; and
 - c. is qualified by experience or have demonstrated competence in the subject of this case.

2. That the reviewing health care professional has determined after a review of the medical records and other relevant material involved in this said action that there is a reasonable and meritorious cause for the filing of this action.

FURTHER AFFIANT SAITH NOT.

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

LAW OFFICES OF RICHARD M. CRAIG, P.C.

By: 
One of the Attorneys for Plaintiff
JANE DOE

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