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7 **IN THE SUPERIOR COURT OF MOHAVE COUNTY**
8 **STATE OF ARIZONA**

11 CHRISTINE BAKER,
12 Plaintiff,

13 v.

14
15 NORTH COUNTRY HEALTHCARE,
16 INC., KINGMAN HEALTHCARE, INC.)
17 dba KINGMAN REGIONAL MEDICAL
18 CENTER, ABHINAV OHRI, MD,
19 ADAM GREGORY DAWSON, DO,
20 LEVI BALLSTAEDT, SOUTHWEST
21 BEHAVIORAL HEALTH SERVICES,
22 INC., KELSEY BRISBIN, NP,
23 RAGHAV LLC dba MORE MD,
24 SARAH JOAN GROHMANN, NP,
25 JOHN DOE and JANE DOE,
26
27

28 Defendants.

COMPLAINT
Medical Malpractice

I am the plaintiff Christine Baker and I allege as follows:

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JURISDICTION AND VENUE

1) This Court has jurisdiction pursuant to Article 6, §14 of the Arizona Constitution and A.R.S. §12-123.

2) Venue resides in this Court as the acts and events contained herein took place in Mohave County.

PARTIES

3) Plaintiff Christine Baker resides near Meadview, Arizona, in Mohave County.

4) Upon information and belief, North Country Healthcare, Inc. (“North Country”) is an Arizona corporation.

5) Upon information and belief, Defendant Kingman Healthcare, Inc. dba Kingman Regional Medical Center (“KRMC”) is an Arizona corporation.

6) Upon information and belief, Defendant Abhinav Ohri, MD, is a neurologist employed by KRMC.

7) Upon information and belief, Defendant Adam Gregory Dawson, DO, was employed by KRMC.

8) Upon information and belief, Defendant Levi Ballstaedt was employed by KRMC.

9) Upon information and belief, Defendant Southwest Behavioral Health Services, Inc., (“Southwest”), is an Arizona corporation.

1 14) For example, I drove a friend to doctors and shopping in Kingman. After
2 a brief conversation with her in the Smiths parking lot about the Christmas
3 lights we had been unable to find in local stores (stress), I forgot that the
4 shopping cart with her groceries was still behind her truck. I backed into the
5 cart – fortunately I hit only a shopping cart and not my friend in the
6 wheelchair.
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10 15) I lived by myself, had no family to support me and my local friends were
11 all much older than me and depended on me to help them. On numerous
12 occasions I had taken friends and neighbors to KRMC or picked them up,
13 sometimes in the middle of the night.
14
15

16 16) On 7/23/15, I took my friend Leo Goding to the KRMC ER as he had
17 diarrhea for weeks and one of his neighbors contacted me because he was
18 afraid to find him dead. Leo lived in a camper without electricity, running
19 water and any cooling. Leo felt much better after he was rehydrated and spent
20 the day in the airconditioned hospital. KRMC discharged him around 9 PM.
21
22

23 17) However, the next day Leo again had diarrhea, we were in the middle of
24 a heatwave and when I called KRMC to have him readmitted and advised of
25 his dire living conditions, they declined to readmit him and transferred me to a
26 social worker who suggested that I drive Leo to the Kingman homeless shelter.
27
28

1 18) On Friday, 7/24/15, I spent the entire afternoon on the phone, trying to
2 get help for Leo. My efforts were futile and he was found dead the following
3 Wednesday. [Exh. 1, my 8/18/15 High Desert Dirt posting]
4

5
6 19) KRMC is responsible for Leo's untimely death.

7 20) In December 2016 my friend John Van Damme died at KRMC and he
8 weighed over 400 lbs. He had previously been at KRMC and despite his
9 attempts to get a referral to a nutritionalist and to possibly have his stomach
10 stapled, KRMC did nothing for him.
11

12 21) On or about 12/3/2018, KRMC called the Kingman police around
13 midnight after I had told a nurse that I would contact the media with the
14 pictures I took of my 78-year old friend because KRMC refused to keep her for
15 the night -- with a broken wrist and black and blue face (concussion, she fell
16 hard that afternoon) and I refused to delete the pictures.
17

18 22) A police officer informed me that I did not have to delete the pictures
19 because my friend had consented and KRMC insisted on discharging her over
20 my objections around 2 am -- knowing that she lived alone, with no neighbors
21 or anyone to assist her and to ensure that she was safe.
22

23 23) I was outraged, posted pictures of my friend and a summary of the
24 events on Facebook and I requested comments from KRMC. I received no
25 comments from KRMC, but my friend requested that I delete her pictures
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27
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1 because KRMC had called her and apparently had intimidated her into asking
2 me to remove the pictures. [Exh. 2, my 12/4/18 Facebook posting]
3

4 24) Presumably, KRMC continues the inhumane vile practice to discharge
5 seriously injured patients regardless of their ability to pay for a cab to get home
6 and with no concern for traumatized and fragile patients' needs and safety.
7

8
9 25) Numerous Meadview residents have refused ambulance transport to
10 KRMC because they could not afford to pay for a taxi from Kingman to
11 Meadview. Even if they have friends or neighbors who could pick them up,
12 most don't want to or cannot make the 120-mile round trip in the middle of the
13 night – with cattle free ranging on the roads almost all the way.
14

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16
17 26) In 2019 I watched a friend commit suicide because his almost 80-year
18 old wife had such a hard time picking him up when he fell and he fell often.
19 Despite numerous stays at KRMC and at a rehab and with North Country as his
20 primary care provider, they had no diagnosis, no treatment, and they had been
21 unable to obtain home healthcare because the wife's efforts to get the required
22 form signed by a doctor were futile.
23

24
25
26 27) I knew that it would be difficult to get competent medical help in
27 Mohave County as a poor person on AHCCCS (Arizona Obamacare), but the
28 Defendants' contempt for me exceeded my worst fears.

1 **FACTUAL ALLEGATIONS**

2 **North Country Healthcare**

3
4 28) Since 2014 Defendant North Country was my primary healthcare
5 provider and it failed to maintain accurate medical records¹ . Instead of
6 correcting my medical records after my request, my medical record now
7 contains even more false information, such as showing plantar fasciitis as
8 current diagnosis.
9

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11
12 29) Despite numerous requests for assistance, North Country failed to refer
13 me to specialists regarding numb fingers and toes, serious short-term memory
14 problems due to the extreme litigation stress and I even had to finally meet
15 with a manager to get a referral to Defendants More MD and Sara Grohmann
16 NP for an MRI and EEG.
17

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19
20 30) North Country failed to provide the most basic care such as ordering
21 periodic blood panels and scheduling follow-up exams². Communications with
22 North Country were and continue to be extremely frustrating and their online
23 messaging system was state of the art in about 1995. None of the North
24 Country responses include a quote of my message to them, it is not possible to
25
26
27
28

¹In 2014 North Country misdiagnosed plantar fasciitis as achilles tendinitis and I suffered excruciating pain for months until Kingman chiropractor Glass correctly diagnosed and I was pain-free within weeks.

²Due to the Defendants' refusals to provide treatment, I have spent thousands of dollars on self diagnosis and supplements

1 “reply” to a message and they failed to properly address my concerns and
2 requests.
3

4 31) For example, on 1/2/22, I requested routine blood tests and a tetanus
5 shot. My blood tests had not been approved by 1/15/22 and I requested my
6 insurer's contact info, North Country provided a general number for AHCCCS
7 instead of the insurer's direct contact information for the department that failed
8 to approve my tests. I finally ordered and paid for my blood tests myself. As of
9 1/28/22, I have not received any further information regarding my blood tests
10 from North Country.
11

12 32) When I called North Country to schedule a tetanus shot as they had
13 required after my written request³, they scheduled an online consult and North
14 Country later canceled it. WHY are TWO appointments required to schedule a
15 routine tetanus shot?
16

17 33) On 1/8/22 I notified North Country that I had had a sore throat for
18 several days and I requested Covid testing as I needed to purchase and deliver
19 food to an 80-year-old friend who can no longer drive to Kingman and I did
20 not want to infect him or anyone else.
21

22 34) North Country failed to respond until 1/11 and I was tested for Covid by
23 Embry Health instead.
24
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³ The North Country messaging system is designed to cause DELAYS and wastes everybody's time and energy.

1 35) Based on my frustrating experiences, I conclude that North Country
2
3 either intentionally makes it incredibly difficult and time consuming to get
4
5 healthcare services so that the patients give up and/or die, or the people in
6
7 charge of their operations are utterly incompetent.

8 **Abhinav Ohri, MD, KRMC, Adam Gregory Dawson, DO,**

9
10 **Levi Ballstaedt & John Doe**

11 36) On 1/29/2000 I finally had my appointment with Defendant Dr. Ohri
12
13 regarding my numb fingers and toes and the loss of my short-term memory and
14
15 inability to focus when severely stressed since I suffered brain damage during
16
17 litigation in fall 2019.⁴

18 37) Dr. Ohri ignored the documents I had brought for him, my North
19
20 Country medical history, a medical summary I had spent many hours to
21
22 prepare and the most recent motion, with the defendants' attorneys claiming
23
24 that my North Country health records, my appointment with Dr. Ohri and my
25
26 sworn declaration were not admissible evidence in support of my request for a
27
28 stay of the legal proceedings.

⁴Working on this Complaint and reliving the trauma and abuse the Defendants inflicted, I have tremendous problems organizing and am so stressed again.

1 38) I had been waiting for my appointment with Dr. Ohri for months because
2
3 the court refused to accept my “self-diagnosis” and consistently sided with the
4 defendants.

5
6 39) Dr. Ohri declined to provide a note for the court so that the proceedings
7
8 would be stayed for a few months and I could rest and recover and then
9
10 continue with my litigation as well as paid work and hopefully be able to earn a
11 living for a few more years.

12 40) **I was devastated, I cried, I was hopeless.** Dr. Ohri destroyed my future.
13
14 Dr. Ohri's refusal to provide me with a note for the court meant that my case
15
16 would most likely be dismissed after 8 years of litigation⁵ and many more
17
18 excruciating hours of working on my motion for sanctions and possibly
19
20 suffering a heart attack, stroke, or even more extensive brain damage --
21
22 because Dr. Ohri did not think that I deserved time to recover and distress.

23 41) I tried hard to get Dr. Ohri to understand that I will have to kill myself
24
25 when I run out of money because my case is dismissed and I can't earn a living
26
27 anymore because my brain isn't working and that I needed to stay the litigation
28

⁵ Since 2012 I had been in litigation and in 2018 the 9th circuit court of appeals overturned two federal judges and remanded my case back to Phoenix district court. Jury awards exceeded over 1 million dollars for much less serious claims.

1 for a few months so that my brain could recover. Dr. Ohri could not possible
2 have cared less.

3
4 42) I am terrified of ending up in a nursing home as my friends and
5
6 neighbors had horrifying experiences and I am very aware of how old and sick
7
8 people are neglected in low budget nursing homes with bedsores, eaten alive
9
10 by ants, raped and abused⁶. Dr. Ohri failed to care about my health and my
11
12 future.

13 43) Dr. Ohri failed to attempt any diagnosis regarding my numb fingers and
14
15 toes, my memory problems and enormous stress and he failed to provide me
16
17 with any treatment options.

18 44) Instead, Dr. Ohri had me transported to KRMC and I never heard from
19
20 him or anyone in his office again.

21 45) Dr. Ohri's report indicates that he was either drunk, drugged or
22 delusional, incapable of accurately describing my symptoms despite the
23 detailed written medical history I had prepared for him and it contains
24 numerous ridiculous false statements. [Exh. 3, Dr. Ohri's 1/29/20 report]
25
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⁶I currently receive \$266 social security per month and do not have the funds to pay for a facility providing state of the art care, treatment and a dignified death.

1 46) At KRMC I again explained my dire situation, multiple times to
2 numerous employees and I thought I might get the letter required for the court
3 to stay the proceedings.
4

5
6 47) KRMC set up an online interview with Defendant John Doe and once
7 again I explained how important it was to get my litigation stayed and to get
8 home to my two dogs and my two new volunteers who were waiting for me to
9 bring back groceries and had no idea how to operate my off-grid house and
10 farm.
11

12
13 48) Defendant John Doe failed to review the documents I had prepared for
14 Dr. Ohri and ordered me admitted to the Loony Bin run by Defendant
15 Southwest, knowing that I really needed to get home.
16

17
18 49) I was informed that I was going to be titled and would be incarcerated in
19 the Loony Bin for weeks until a judge would decide fate⁷.
20

21 50) I yelled and screamed, trying to get them to understand that incarceration
22 could literally be my death sentence due to the fact that I had nobody to look
23 after my volunteers, dogs and off-grid operations. I could not get anyone to
24 listen and it is a miracle that I didn't suffer a stroke or heart attack with my
25 extremely high blood pressure, 203/117 according to the KRMC report.
26
27
28

[Exh. 4]

⁷ I overturned two Kingman judges on appeal and they don't like me.

1 51) Numerous men held me down and injected me with some drug while I
2 was I was fighting them and screaming as loud as I could – I had to THINK
3 about what if anything I could do to assist my volunteers and I was scheduled
4 to work the next day in Meadview. I know now what it's like to be gang raped.
5 Resistance is futile.
6
7

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9 52) I was moved to the hallway, unconscious at times, vomiting bile⁸, and I
10 was again injected with some drug, vomited more bile, again and again. It was
11 horrific.
12

13 53) Attached hereto is the 1/29/20 KRMC report titled “Emergency
14 Department Note”, signed by Defendant Adam Gregory Dawson, DO, listing
15 him and Defendant Levi Ballstaedt as ED providers and containing numerous
16 false statements. [Exh. 4]
17
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19
20 54) Attached hereto is my 2018 Draft Suicide Petition as Exhibit 5. I
21 explaining that I want to die with dignity and in peace like a pet when I can no
22 longer afford to live (run out of money). I hope to be able to update and finally
23 send my Petition to our legislators “soon”. Since the Republicans don’t want
24 to provide costly social services and healthcare for all, I expect these cruel
25 legislators to be thrilled to enact a new law that will save the state of Arizona
26 many millions of dollars -- euthanasia costs obviously significantly less than
27
28

⁸ I had not eaten since the previous day.

1 warehousing old and sick poor people until they finally succumb to chronic
2 illness and/or old age.
3

4
5 **Southwest Behavioral and Kelsey Brisbin, NP, Jane Doe**

6 55) In the middle of the night I was transported in the back of a police car to
7
8 Defendant Southwest's facility in Kingman, hereafter referred to as Loony Bin.

9 56) I was sitting in a recliner all night, waiting to be processed.
10

11 57) During another online interview with Defendant Kelsey Brisbin she
12 referred to my “suicide petition” [Exh. 5], but refused to actually read and she
13 refused to listen to me.
14

15 58) During intake I was asked about my dietary preferences and not
16 expecting the organic food I was used to, I stated that I was vegetarian, hoping
17 for vegetables and greens. One time I received some romaine salad and
18 another time I picked the disgusting turkey cubes out of a pasta dish before
19 eating a little. Their so-called “food” causes illness and was not appropriate for
20 any humans or animals, and especially harmful for people with mental health
21 issues⁹. My diet consisted of mostly organics and little meat, gluten and
22 processed foods. Twice they served chili dogs. Once I asked for veggies and
23 the guy looked at me like I was truly insane. I got nothing.
24
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⁹ Is the kitchen management at Southwest completely unaware of the importance of a healthy microbiome and the impact of toxic food on overall health and especially the brain?

1 59) On Friday, Alex (staff) read my 2018 Draft Suicide Petition [Exh. 5], he
2 felt that I should not be institutionalized and he offered to attend my daily
3 interview with Kelsey Brisbin. Finally, because Alex supported me, she finally
4 read my Draft Suicide Petition and it was priceless to watch her face.
5

6
7 60) However, Kelsey Brisbin refused to finally release me because I had a
8 Medical Marijuana card. I had been drinking organic tea with my organically
9 grown cannabis infused organic coconut oil at night and it consistently lowered
10 my blood pressure without the serious negative side effects of pharmaceuticals.
11
12

13 61) My volunteers had left, my dogs were alone outside in January and I had
14 very little access to my phone for calls and no access to a computer and
15 internet access at all. I did not know what the weather was – there wasn't a
16 single window in the Loony Bin. Did we have single digit temperatures? Did
17 my dogs freeze to death? Did all my plumbing freeze up and fry the entire
18 water system? Was it cloudy and the motors of my appliances had burned out
19 due to low voltage? Did the unmonitored solar system cause a fire? The
20 vacation rental I managed was listed on Airbnb and could have been booked
21 with one day notice. I was so stressed.
22
23

24 62) During the very limited times when we were permitted to make phone
25 calls, staff was literally no more than 3 feet away. We had absolutely no
26 privacy.
27
28

1 63) We were not provided with any underwear. Even notoriously cruel
2
3 sheriff Joe Arpaio gave his prisoners pink underwear and I would not have
4 cared about the color. It was so inhumane and demeaning.

5
6 64) The only inmate allowed to wear shoes and her own clothes was a repeat
7 and long-term inmate battling addiction. Everybody else had to wear these old
8 blue shirts, pants and socks.

9
10 65) On Saturday morning an inmate had expressed their frustration by
11 plugging up the toilet in a bathroom with paper, defecating, and then
12 flushing. Urine and feces flooded the bathroom / shower floor. Despite the
13 inmates' numerous requests for cleanup, staff did absolutely nothing until
14 Sunday, when they finally locked the bathroom.

15
16 66) The bathroom sinks were almost always incredibly disgusting as they
17 were not designed to drain properly (flat) and were covered with scum, hair,
18 toothpaste and whatever the inmates spit out.

19
20 67) On Saturday it was incredibly cold and staff ignored the inmates'
21 repeated requests to turn up the thermostat. We huddled all day under
22 blankets like in a refugee camp in a developing country.

23
24 68) My daily interview was with Defendant Jane Doe and she refused to
25 release me.
26
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1 69) We didn't get much sleep Saturday night as one of the inmates
2 repeatedly screamed.
3

4 70) I watched where I was walking in my socks on the way to a bathroom as
5 I had been warned that some inmates urinate in the hallways to express their
6 frustration. When I noticed a puddle on the floor, I advised staff that someone
7 had urinated in the hallway. The woman claimed that it was spilled water. I
8 had to stick my finger in the urine and hold it up to her face to get her to clean
9 it up.
10
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13 71) I had a lot of time to think Saturday night about how I would get out of
14 this filthy hellhole, this literal shitshow, and I developed my action plan:
15

16 **It was time to KICK ASS!**
17

18 72) Sunday morning I held a workshop for the other inmates about E. coli
19 and salmonella transmission due to the unsanitary conditions in the Loony Bin.
20

21 73) After the workshop I announced that I wanted to talk to each inmate
22 interested in sharing their story. I had a loony bin safety pen and a little
23 notepad so I could take notes and keep a journal during my incarceration. The
24 inmates who were not too drugged were excited to talk to me. It was
25 heartbreaking to hear their stories and how most did not get the help they
26 needed and deserved. I was going to use what little phone time we got to
27 contact the media.
28

1 74) Incredibly, I was told that I would be discharged immediately and I had
2 a very short interview with Jane Doe, essentially just advising that I would be
3 released.

4
5
6 75) Throughout my 4 days in the Loony Bin, I was not aware of any inmate
7 actually receiving treatment other than pharmaceuticals. Some were almost
8 always barely conscious or passed out. I had refused my medication (lithium)¹⁰
9 against the advice of the other inmates, who thought that not taking the meds
10 would result in longer incarceration. However, one night I agreed to take a
11 blood pressure pill because my blood pressure was extremely high and I did
12 not want to appear suicidal.

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17 76) I never saw daylight during my incarceration in the Loony Bin. There
18 was no garden, not even a single window – and the only source of light were
19 disease-causing fluorescent lights.

20
21 77) Prisoners have more rights and are treated more humanely than the
22 inmates in the Loony Bin. For example, a judge ordered that one of the
23 incarcerated insurrectionists be served organic food and most prisoners can
24 make a phone call without a guard continually listening to every word.
25
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¹⁰I do not take prescription or over the counter pharmaceuticals and I successfully normalized my chronic high blood pressure (usually around 160 / 130) with supplements and lifestyle and dietary changes by September 2019. In 2018 I reversed my dog's complete blindness (cataracts) with supplements. Many prescription drugs cause "side effects" resulting in serious illness and often death.

1 **78) I experienced what caused me to write my 2018 Draft Suicide**
2 **Petition, the systemic abuse in hospitals and nursing homes and as I am**
3 **now painfully aware -- the abuse in the Loony Bin.**
4

5
6 79) While my volunteers had left after I was incarcerated, I was so excited to
7 find my dogs physically ok after being alone and outside for 4 nights. Sadly,
8 my older dog was traumatized, very fearful, and startled when approached and
9 he didn't see it was me.
10

11
12 80) I seriously doubt that I would have had the strength to keep on living if
13 my dogs had not been there. I would have had no reason to live anymore. The
14 abuse I had suffered at KRMC and in the Loony Bin left me traumatized,
15 possibly forever.
16

17
18 81) My very worst fears had become reality and it was so much worse than I
19 had ever imagined. The horrible food, dehumanizing lack of clothing,
20 unsanitary conditions, lack of privacy for phone calls, lack of internet access
21 and the complete absence of any treatment whatsoever ... Mohave County, the
22 shithole county, as former president Trump would say.
23

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25
26 82) I was required to schedule an appointment with Mohave Mental Health
27 and they were no help at all, had no answers to my questions. I therefor sent
28 my questions to Mohave Mental Health by email, twice. I got no response.

[Exh. 5, letter to Mohave Mental Health]

1 83) My many attempts to get my medical records from Southwest and
2 KRMC failed. While I could access some records through the KRMC Patient
3 Portal, I never received all records in a comprehensive format. My request for
4 my records at KRMC in about August 2020 was refused and as of 1/24/22, the
5 function to email and download my health record from the Patient Portal
6 resulted in a lot more frustration because I ended up with files that did not
7 open.
8

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12 **Raghav LLC dba More MD and Sarah Joan Grohmann**
13

14 84) I was obsessed with getting my brain fixed after my release from the
15 Loony Bin and after jumping through countless hoops and switching insurance,
16 I finally had an appointment with Defendant Sarah Joan Grohmann NP at More
17 MD in Lake Havasu City.
18

19
20 85) I got an MRI and EEG at KRMC in Kingman, but More MD's office
21 advised that they didn't receive the records when I fortunately called them
22 before making the 2-hour drive to my second appointment with Sarah Joan
23 Grohmann.
24

25
26 86) More MD tasked me with getting the MRI and EGG from KRMC to
27 More MD. It was so incredibly stressful! Repeatedly I was told that the fax
28

1 machine at More MD loses faxes.¹¹ KRMC kept telling me that they faxed to
2 More MD, but More MD never received anything. After lots of stress, KRMC
3 finally contacted More MD directly. Why can doctors require patients to
4 perform slave labor for them?
5

6
7 87) On 8/25/20 More MD called to advise that they finally had the MRI and
8 EEG reports and that I had a telephone appointment with Sarah Grohmann that
9 afternoon. Incredibly, Ms. Grohmann claimed that my brain was “fine”
10 despite the reports indicating problems. [Exh. 7, 8, the MRI and EEG reports]
11

12 88) Despite my extraordinary efforts to get Ms. Grohmann to understand
13 how important it is that I receive a diagnosis and treatment, she outright
14 refused to do anything for me and instead, sheriff’s deputies showed up at my
15 house over an hour later. Was I supposed to kill myself? Is that how healthcare
16 works in Mohave County?
17

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21 89) Imagine coming back to your house, police car at your property,
22 neighbors congregating to see what happened, while the officers are searching
23 for your body. What is the intent? Humiliate the patients until they commit
24 suicide because their reputation is destroyed?¹²
25
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¹¹ Lost faxes were also initially an issue with my referral to More MD and it had to be resent, causing work and a lot of stress for me.

¹² Locals call me “psycho” on Facebook.

1 90) **I am alive today primarily for two reasons:**

2
3 a) Covid resulted in the cancellation of most rental bookings and I received
4 unemployment, allowing me to work in my garden and greenhouse. I
5 didn't have to worry about how to pay my bills, could research treatment
6 options and purchase supplements and treatments.
7

8
9 b) I received an inheritance in winter 20/21, enabling me to survive despite
10 Republican governor Ducey's vile decision to cut off the federal
11 unemployment benefits early and despite the DES also canceling my
12 \$117/week state unemployment benefits in 7/21 because its website
13 malfunctioned again. I never received the promised call from a DES
14 adjudicator.
15
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18 91) I am doing better than two years ago and if the vacation rental business
19 picks up this spring and nothing bad happens, I'll likely be able to live a few
20 more productive years.
21

22
23 92) My federal court case was dismissed in 5/20 because I was unable to
24 even think about writing my motion for sanctions. I couldn't even obtain my
25 medical records.
26

27 93) **This action is likely my final opportunity to make a difference for**
28 **the DISADVANTAGED:** The old, the sick, the disabled, the poor, the

1 immigrants, the people of color, the technologically challenged, the not so
2 smart, the brain damaged ...

3
4 94) I will do what I can to make Mohave County a better place to live and
5 die.
6

7 8 **MEDICAL MALPRACTICE**

9
10 95) All Defendants failed to exercise the degree of care and skill expected of
11 a reasonable, prudent healthcare provider, failed to provide the necessary care,
12 failed to keep accurate records and North Country failed to correct the records
13 when requested.
14

15 16 **FAILURE TO PROVIDE MEDICAL RECORDS**

17
18 96) Defendants Southwest and KRMC failed to provide my medical records
19 as required by ARS 12-2293.
20

21 22 **DAMAGES**

23 97) As a direct and proximate result of the Defendants' actions, I have
24 suffered serious and possibly permanent brain damage. After I first suffered
25 brain damage during the litigation in 2019, I improved substantially after just a
26 week or two without stress.
27
28

1 98) It has been two years since the Defendants not only refused to provide
2 treatment, but maliciously made my brain so much worse and it was extremely
3 difficult for me to write this Complaint.
4

- 5
- 6 a) I am requesting a jury trial.
 - 7 b) I am seeking damages for mental anguish and emotional
8 distress.
 - 9 c) I am seeking funds for treatment by brain experts of my
10 choice such as the Amen Clinics in California or Cleveland
11 Clinic in Las Vegas with state-of-the-art equipment and
12 expertise in diagnosing, treating and reversing brain
13 damage.
14
 - 15 d) I am seeking funds for therapy by a qualified expert of my
16 choice to attempt to heal the trauma I suffered while abused
17 and incarcerated by the Defendants.
 - 18 e) I am seeking funds to pay for professionals to assist me and
19 if/when necessary, to move with my pets into a facility
20 providing organic meals, therapy and treatment in a
21 positive, safe and healthy environment.
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 - 23 f) I am seeking reimbursement of my potential award in my
24 litigation in federal court.
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- g) I am seeking \$10,000,000 to establish an organization in Mohave County to assist the many disadvantaged who cannot help themselves and to establish a daily wellness check program so that seniors don't have to worry about falling, dying and decomposing for weeks in their homes and being eaten by their pets that will be killed because they ate human flesh if they are found alive.

- h) I am seeking CORRECTION of my medical records. I do not want to have to admit to being institutionalized for mental health issues every time I see a doctor, be refused treatment and be abused again because of the stigma. I need my reputation restored.

- i) I am seeking reimbursement of all costs and expenses related to this action and attorneys' fees. While I am currently representing myself, I will attempt to retain counsel and/or pay for legal advice.

I certify under penalty of perjury that my statements in this Complaint are accurate to the best of my knowledge and that my exhibits are true copies of the originals.

1 Respectfully submitted this 28th day of January, 2022.

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s/ Christine Baker

Plaintiff Pro Se