

22-403

USAP7 22-1229

ORIGINAL

TO THE

SUPREME COURT OF THE UNITED STATES

Frances Endencia

v

IDFPR Administrative Law Judges

Daniel E. Bluthardt, James Jeffrey Canavan &

PMH-ADT-Police James Keegan, APA et al

Petitioner

Respondents

From US District Court 1:21-cv-02360

Court of Appeals 22-1229

On Petition for Writ of Certiorari to the United States

Court of Appeals for the Seventh Circuit

Petition for Writ of Certiorari

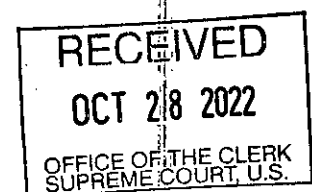
Oral Argument Requested

Frances Endencia, Petitioner in pro sec

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I Questions Presented

1. The American Psychiatric Association designed & trains students of psychiatry to rewrite any complaint presented to them into psychiatric disorders. Their goal is to change behavior by altering the brain, stigma & make money by creating lifetime treatment plans. They share their medical records among themselves for unity in other opinions (since their work does not involve science or facts) & to keep their patients in the system. Is Psychiatry health care fraud 18 USC § 1347^{M.2}? The stigma is a civil rights violation 42 USC §1983^{M.2} causing unemployment & malicious alienation of affection.
2. Administrative Review of Judges Canavan & Bluthardt in *IDFPR v Endencia* 2005 01942, that led to my license suspension, when there was no evidence of impairment. [Complaint Doc # 1 Appendix p 102] To get it reinstated, I ("I" refers to plaintiff) needed to comply with 735 ILCS 5/2-622^{M.1}, Dr Henry was paid by IDFPR. As a PMH Partner & psychiatrist, he fabricates evidence of psychiatric illness. He did not deviate from the norms of psychiatry. I paid Dr Reynish to get a 2nd opinion, (App B.1) only to discover psychiatrists corroborate & support each other's reports & a health care fraud against the people of USA in pursuant to 18 United States Code 1347 (a) (1) ^{M.2}. Did United States [Illinois] err in licensing psychiatrists? Schools of psychiatry train their students follow APA guidelines & commit

fraud.

3. The Knox Co. trains villages & municipalities in USA to create ordinance requiring business owner to collect keys & place keys in Knox boxes for emergencies. They are also utilized by [ADT] law enforcement to commit burglaries & break-ins. Streamwood, IL has this ordinance.

ADT's security system can be turned ON & OFF from customer & ADT's side. PMH Partners is an ADT dealer, with ex-Streamwood Police Officers such as James Keegan & Mandarino burglarized Pampered Pet Veterinary Service ("PPVS") with a cumulative loss of about \$35k & staged break-in & caused referral to PMH Partner, Dr Henry, leading to suspension of my veterinary license. Should ADT be accountable for break-ins by their employees (police) despite presence of exculpatory clause in their contract with their customers?

4. Nathan Hamacek ("Nathan H"), Dan Benyousky ("Dan B") utilized Winnebago County Judge, Lisa Fabiano ("Fabiano"), Wendy Vaughn ("Wendy V"), Teresita Endencia (deceased), DCFS of Glen Ellyn, Bill Maffey ("Bill M"), Mohinder Cahdha ("Mohinder C") psychiatrists are instrumental in intentionally alienating affection between me & my daughter, Altessia by causing emotional distress & death of her unborn child. Should immunity under the color of the law, be vested upon Judge Fabiano & others?

II List of Parties

Plaintiff is Dr Frances Endencia, DVM ("I" hereafter).

I purchased Barrington Road Animal Clinic or "BRAC" hereinafter, from Prince-Maloney-Henry (PMH) Partners in 1999, located at 140 N Barrington Rd Streamwood IL. I changed the name to "PPVS". Dr Joel Prince Sr, Dr John Coyne & James Keegan are cousins.

Defendants are:

- (1) James Jeffrey Canavan

IDFPR Administrative Law Judge

100 W Randolph 9th Floor, Chicago IL 60601 (312) 793 7090

- (2) Daniel E Bluthardt

IDFPR Administrative Law Judges

100 W Randolph 9th Floor, Chicago IL 60601 (312) 793 7090

- (3) PMH Partner¹ & IDFPR forensic psychiatrist

(a) Dr Stafford Henry, Psych Md ("Henry")

105 W Madison St, Suite 1106, Chicago IL 60602 (312) 251 1400

- (4) The American Psychiatric Association or "APA"

800 Maine Ave SW, Washington DC 20024

- (5) Dr Joel Leroy Prince Sr¹ (born in 1934), ("Prince"), DVM, ADT dealer,

I believe he is a locksmith, professional thief of veterinary inventory

12330 Vista Brook Ln, Knoxville TN 37934

(865) 288 3808 Maryp319@yahoo.com

(6) Dan Maloney¹ ("Maloney"), PMH Partner CPA & Accountant,

unlicensed business appraiser for Dr Prince Sr, money launderer,

61 East Ogden Ave, Clarendon Hills IL 60514 (630) 887-0500 info@

maloneycpa.com

(7) James Keegan St Charles Chief of Police

("Keegan") 1515 West Main Street, St Charles IL

Former Streamwood Police Officer

jkeegan@stcharlesil.gov (630) 377-4435

(8) ADT Security System. ("ADT")

1500 Yamato Drive, Boca Raton FL 33431-2727

(888) 238 2727

vgavrilovich@adt.com tbenacka@adt.com

mbrokaw@adt.com wtomlinson@adt.com

bbbcomplaints@devonsecurity.com

(9) The Knox Company. www.knoxbox.com

1601 West Deer Valley Road, Phoenix, AZ 85027

gthode@knoxbox.com (800) 522-5660

(10) Streamwood Police / ADT employees

Steve Kisch, David Papay, James Mandarino, Laura Siedleski

401 Irving Park Road, Streamwood, IL 60107

(630) 837 0953 police@ streamwood.org

- (11) Nathan Hamacek ("Nathan H")

12 N 242 Westview Drive, Elgin IL 60124

Licensed Psychiatric Partnerships

- (12) Dan Benyousky, former employee of

Wheaton Youth Outreach, ("Dan B")

601 Dyer Ave, Waco TX 76708

(574) 269 2060 bigbrother @hotmail.com

- (13) Bill Maffy ("Bill M") et al, DCFS of Glen Ellyn

800 Roosevelt Road #D10, Glen Ellyn IL 60137

(630) 790 6800

- (14) Wendy Vaughn ("Wendy V"), Zeke Legal Clinic

401 West State Street, Rockford IL 61101

wvaughn @niu.edu 815(9629980

- (15) Judge Lisa Fabiano ("Judge Fabiano")

400 West State St Rockford IL 61101

III. Corporate Disclosure Statement

Plaintiff-Appellant:

Dr Frances Endencia, DVM, (or "T") bought the Pampered Pet Veterinary Service ("PPVS") from Prince-Maloney-Henry Partners (hereinafter "PMH Partners"), located at 140 N Barrington Road Streamwood IL 60107. Currently dissolved.

IV. List of All Proceedings State & Federal

1. PMH Partners v The Pampered Pet Vet Service 03 L005915 Cook County, IL PPVS won accounting fraud 2004.
2. IDFPR Review: IDFPR v Endencia 2005-01942. Suspension of veterinary license entered on Aug 28, 2008. Appendix K.3
3. Endencia v ADT 08 L 000221 Cir Ct Cook County IL ADT case transferred to District Court 1:08-cv-04541 Order Dismissed for ADT's exculpatory clause in contract 10/28/2008.; USCA dismissed. 6/12/2009; 558 US 1052; 130 S Ct 743 (2009) Dismissed.
4. Endencia v Behavioral Health Care Associates 09 M 3341. Moot. Cir Ct Cook County Judgment 1/29/10 See Appendix A.1 Endencia v Behavioral Health 1-10-1319 IL App dismissed moot 10/28/2010. See Appendix A.2
5. Endencia v Rush Behavioral Health 12 L 011388. Cir Ct Cook County. Judgment dismissed for lack of 735 ILCS 5/622 affidavit; July 1, 2013.
6. Endencia v Rush Behavioral Health No 13- 21299 App 1st Div 12/2/2014.

2014 IL App (1st) 132129U

7. Endencia v Henry et al 16 L 63072
8. Endencia v IDFPR et al 1:17 -cv-2256; Appeal 17-2256. 7/21/2017
9. Endencia v IDFPR 1:17-cv-02045 Order 4/11/17
10. Eviction with no court order Dec 14-16, 2015

DuPage Sheriff Zaruba (Doc 90 page id # 1275-1319).

11. Altessia Endencia v Endencia 2009 OP 959 Winnebago County
12. Estate of Altessia Endencia 2009 P 378
13. Attempted murder Rockford Police

People of State of IL v Endencia2009 CF 000228.

V Table of Contents

I	Questions Presented	i
II	List of Parties	iii
III	Corporate Disclosure Statement	vi
IV	List of Proceedings	vi
V	Table of Contents	viii

Table of Cases	
<i>Abacus Fed S Bank v ADT</i> 18 NY 3d 675	15
<i>ADT Co v Brink's Inc</i> 380 F 2d 131	15
<i>Aranda v Com Psych Centers of OK</i> 945 F Supp 1485	21
<i>Ashcroft v Iqbal</i> , 556 US 662, 679, 129 S Ct 1937, 1950 (2009))	4
<i>Bank of Waunakee v Rochester Cheese Sales, Inc</i> , 906 F 2d 1185, 1191 (7 th Cir 1990).	2
<i>Barefoot v Estelle</i> 463 US 880 103 S Ct 3383; 77 L Ed 2d 1090 (1983)	21
<i>Barnhart vs US</i> 884 F 2d 295	21
<i>Bell v City of Chi</i> , 835 F 3d 736, 738 (7th Cir 2016)	4
<i>Bell Atl Corp v Twombly</i> , 550 US 544, 558, 127 S Ct 1955, 1966 (2007)	4
<i>Bernier v Burris</i> 113 Ill 2d 219, 226-27 (1986)	8
<i>Boswell v State</i> 610 So 2d 670	21

<i>Boutte v Nw Med Found</i> 276 F App 490, 491 (7th Cir 2008)	4
<i>Bower v Jones</i> , 978 F 2d 1004, 1008 (7th Cir 1992)	6
<i>Brancaccio v State</i> 698 So 2d 597;	21
<i>Broadus v Shields</i> , 665 F 3d 846, 860 (7th Cir. 2011)	2
<i>Brooks,Ngwenhya v Indianapolis Pub Sch</i> , 2019 US App LEXIS 26639, at *4	6
<i>Caine v Burge</i> , 897 F Supp. 2d 714, 717 (ND Ill 2012)	2
<i>Caisee Nationale de Credit Agricole v CBI Indus</i> ,	3
<i>Cesal v Moats</i> , 851 F 3d 714, 720 (7th Cir 2017)	4
<i>Coleman v Akpakpan</i> , 402 Ill App 3d 822, 825	7
<i>DAG Jewish Direct</i> 210 WL 32192292	17
<i>Ex parte Young</i> , 209 US 123, 159-60 (1908)	5
<i>Fennell v Illinois Central RR Co</i> 2012 IL 113812	8
<i>Flink v Simpson</i> 305 P 2d 803 Wash S Ct	16
<i>Fortress Grand Corp v Warner Bros Ent Inc</i> , 763 F 3d 696, 700 (7th Cir 2014)	3,4
<i>Frye v United States</i>	1, 17
<i>Gibson v City of Chicago</i> , 910 F 2d 1510, 1520 (7th Cir 1990).	3
<i>Hall v Naper Gold Hospitality LLC</i> , 2012 IL App (2d) 111151. (App K.10)	2,8
<i>Hampton v Chicago</i> 484 F 2d 602, 608 (CA7 1973)	2
<i>Haywood</i> , 887 F 3d at 335	6

Herring v USA 04-427 3rd Court of Appeals 17

Hill v Tangherlini, 724 F 3d 965 (7th Cir 2013) 2

Hobbs v Lorenz, 357 Ill App 3d 566, 569, (2003) 8

Hollywood v Massage Envy Franchising LLC 887 F 3d 329 (7th Cir 2018) 3

Hoska v U S Army 677 F 2d 131 17

Int Dist. Corp v ADT 569 F 2d 136 (1977) 15

Jackson v Chicago Clas. Janitorial & Cleaning Ser 355 Ill App 3d 906, 909 8

Jackson 355 Ill App 3d at 911, 912 8

Jimenez et al v City of NY 1:2014-cv02994 17

Kirk v Michael Reese Hospital 513 NE 387 21

Kolanowski v Illinois Valley Community Hospital 188 Ill App 3d 821, 824 (1989)

Kröll v Bd of Trustees of Univ of Illinois, 934 F 2d 904, 907 (7th Cir 1991) 5

Lawrence v City of NY 1:2015-cv-08947 17

Li v Ill Dep't of Fin. & Prof'l Regulation, 2018 US Dist LEXIS 48734 at *7-8

(ND Ill Mar 23, 2014) 5

McCready v eBay Inc, 453 F 3d 882, 891 (7th Cir 2006) 5

McMunn 191F Supp 2d at 462 17

Mitchell v Forsyth 472 US 511, 530; 105 S Ct 2806; 86 L Ed 2d 411 (1985) 20

<i>Mueller v Apple Leisure Corp</i> 880 F 3d 890, 895 (7th Cir 2018)	4
<i>O'Casek v Children's Home & Aid Society of Illinois</i> 229 Ill 2d 421, 436 (2008)	8
<i>Parungao v Cmty Health Sys</i> , 858 F 3d 452, 457 (7th Cir 2017)	5,6
<i>People v Hanson</i> 9689 S Ct IL	21
<i>Rock Island County v Boalbey</i> , 242 Ill App 3d 461, 462 (1993).	7
<i>Salinas vs US</i> 522 US 52	15
<i>Shan gold</i> 2006 WL 71672	17
<i>Slater v Nat Med Ent</i> 962 SW 2d 228 1998 WL 32421	21
<i>Strode v Gleason</i> 510 P 2d 250, WA Ct of Appeals 1st Div (1973)	16
<i>Synex Corp v ADT</i> 928 A 2d 37 (2007)	15
<i>United States v Boliaux</i> , 915 F 3d 493, 496 (7th Cir 2019)	7
<i>US v Marmolejo</i> 89 F 3d 1185 (1996)	15
<i>Vancara v Karis</i> 238 Ill 2d 352, 369-70 (2010)	7
<i>Villars v kubiowski</i> , 128 F Supp 3d 1039, 1043 (ND Ill 2015)	3, 5
<i>Wearry v Foster</i> 2022 BL 153489; 5th Cir 20-30406	20
<i>Woodard v Krans</i> , 234 Ill App 3d 690,703 (1992)	8
<i>Woodard</i> 234 Ill App 3d at 705-06	8
VI Citations of Opinions of the Court (Orders).	1
VII (i) Jurisdiction May 11, 2022 (App B).	9
(ii) No rehearing	

(iii) No cross-petition of writ

(iv). Diversity of Defendants

(v) Notification in pursuant to Rule 29.4(b)

VIII Stages 10

IX Constitutional Regulations. 11

X Definitions 12

XI Statement of the Case 12

A. Review of PMH-ADT Security with Streamwood Police as employees as perpetrators of break-ins & theft. State courts erred where ADT has exculpatory clause that prevents liability.

Endencia v ADT 1:08-cv-04541 Order 10/28/2008. (p 3) 12

B. Review of the Knox Co sales strategy. 12

C. Review of Psychiatry as health care fraud. 18 US Code 1347

The architecture of psychiatry evolved under the leadership of APA. The training in schools of psychiatry is defined by APA. (p 5) 13

D. Review of State of Illinois IDFPR's order of indefinite suspension of my veterinary license (App K).

* Admin court erred in suspending my license because there was no evidence of impairment. *IDFPR v Endencia* 2005-01942 Order on Aug 28, 2008. 13

E. Review of Money Laundering by Dan Maloney 13

F. Intentional alienation of affection to cause death of unborn child in Estate of Altessia Endencia 2009 P 378 Order Nov 2009. By Nathan H & Dan B. They instituted the no talk policy in July 2009. We have not talked to each other since then. Fabiano (App L.1). 13

XII Reasons for Granting this Writ

A. USA (IL) erred in licensing Psychiatrists, 18 USC 1347

B. USA erred in enforcing ADT's exculpatory clause

when ADT's own employees' (police) are responsible for break-ins & theft.

C. Intentional alienation of affection by psychotherapist, Dan B & Nathan H., et al to cause death of unborn child of Altessia & theft of DuPage

Sheriff, stealing practically everything I owned in 2015. (PMH Partners were interested in business assets)

XIII Statutory time limit 22

(a) There is no statutory time limit for fraud upon the court

(b). There is no statutory time limit for ongoing health care fraud

(c) There is no statutory time limit for ongoing fraud & theft of PMH-ADT-Streamwood Police as employees of ADT (Keegan, Papay, Mandarinino)

XIV Case is Important 22

Vehicle to put an end to

(i) PMH-ADT-Law Enforcement break-ins

(ii) Psychiatric health care fraud

XV Conclusion

Appendix

- A. Jurisdiction: Endencia v APA et al Court of Appeals No 22-1229 order entered May 11, 2022.
- B.1 Endencia v Behavioral Health Care Assoc 09 M 341 order entered 1/29/2010
- B.3 Endencia v Behavioral Health Care Ass et al IL App Ct 1-10-1319 Order 10/28/2010
- C.1 Endencia v PMH Partners, APA et al. Order entered Jan 11, 2022. (File # 82) 1:21-cv-02360
- C.6 My Response
- C.8 Endencia v APA et al 1:19-cv-03161 Judge Mary Rowland's Order Oct 7, 2019
- C.20 Endencia v APA et al 10-3170 US Ct of Appeals Order 6/29/2020
- D Notice of Appeal Doc # 86 Feb 10, 2022
- E.1 Frances' Perspective #1 A staged break-in.
- E.2 Mar 2005. Streamwood Police Report
- F.1 Frances' Perspective #2
- G.1 Jan 18, 2006, Dr Ludwig's (DVM) order for psychiatric evaluation with Dr Henry

H.1 Frances' Perspective #3.

Nov 29, 2007. Psychiatric diagnostic tests, word & picture games, .

Rorschach tests, are not discoverable 68 Ill Adm Code 1110.130

Frances Perspective #4, Streamwood police report turns into Psychiatric disorder. Dr Henry's psychiatric evaluation

I.2 Administrative Law Judge Canavan's Report & Recommendation

J.1 Veterinary Board's Findings of Fact & Conclusions of Law

K.1 Administrative Law Judge Daniel Bluthardt's Report & Recommendation

K.3 Order for Review: Veterinary License indefinite suspension 8/28/ 2008

K.8 Appeal Suspension Order

Endencia v Rush Behavioral Health 12 L 11388

K.8 Endencia v Rush Behavioral Health 1-13-2129; 2014 IL App (1st) 132129-U
Order Dec 2, 2014

L.1 IDFPR News Medical defamation (Black box secret of psychiatry)

L.2 Order for Review: Judge Lisa Fabiano's separation & loss of affection
between myself & my daughter

L.3 Frances' Perspective #5

M Constitutional Provisions

225 ILCS 115/3 Definition of Impaired Veterinarian M.1

720 ILCS 5/12C-5 Endangering Life & Health of a child M.1

735 ILCS 5/2-622 Medical Malpractice requirement M.1

18 US Code 1347(a) Health Care Fraud M.2

18 US Code 241 Conspiracy against Rights M.4

18 US Code 242 Deprivation of Rights under Color of Law M.3

42 US Code 1983 Civil Action for Deprivation of Rights M.2

Fed Rules of Evidence 406 Habit Routine M.3

N Medicalization Writing Template

DSM-IV-TR Multiaxial Classification

O Is Psychiatry a Consumer Fraud? (Presentation @ Judge Fink's trial)

VI Citations of official & unofficial reports of the opinions & orders entered in the case by courts or administrative agencies.

a) In Georgianne Ludwig's (DVM) order 1/18/2006

"Frances Endencia will submit to physical & mental examinations...designated by IDFPR" (App G.1)

#4 "The cost of the examination and any testing & preparation of detailed report shall be paid by IDFPR" (App G.2)

b) In Judge Canavan's report

#9 he stated: "there is no evidence of competency concerns" (App I.7)

c) In Judge Bluthardt's order 8/29/2008,

"The Department has proven clear & convincing evidence that Respondent violated the Illinois Veterinary Medicine & Surgery Practice Act. The purpose of the Agreement of Care, Counselling & Treatment in a case like this is to help the individual function better....(App K.2) I hereby order that veterinary license issued to Frances Endencia ...shall be indefinitely suspended" (App K.5)

d) In Judge Der-Yeghiayan's order 11/24/2008

Endencia v ADT Doc # 15 PageId # 73 excerpts of ADT's exculpatory clause contract yielded a dismissal of the case in ADT's favor.

e) *Endencia v Behavioral Health Care Associates* 09 M 3341 by Judge Fink 01/29/2010. (App B.1)

"In order to plead and prove medical malpractice complaint, there must be

allegations that the individual doctor's performance did not meet the standard of the medical community. Secondly, Illinois follows *Frye v United States* and the tests utilized, psychiatrists have obviously gained general acceptance in the practice held in which they belong. It then follows that the licensed practice of psychiatry is not consumer fraud."

f) *Endencia v Behavioral Health Care Ass* No 1-10-1319, IL App Ct, 1st Dist Brief stricken & dismissed Oct 28, 2010 (App B.2)

g) *Endencia v APA et al* 21-cv-02360; 2022 WL 103707 (ND Ill) Judge Rowland Order on 1/11/22 (App C.1)

"A motion to reconsider is appropriate only "where a court has misunderstood a party, where the court has decided outside the adversarial issues presented to the court by the parties, where the court has made an error of apprehension (not of reasoning), where a significant change in the law has occurred, or where significant new facts have been discovered." *Broadus v Shields*, 665 F 3d 846, 860 (7th Cir. 2011), *overrules on the other grounds by Hill v Tangherlini*, 724 F 3d 965 (7th Cir 2013). Such circumstances are rare and the "party moving for reconsideration bears a heavy burden" to prove such problems exist. *Caine v Burge*, 897 F Supp. 2d 714, 717 (ND Ill 2012); *Bank of Waunakee v Rochester Cheese Sales, Inc*, 906 F 2d 1185, 1191 (7th Cir 1990). "Reconsideration is not an appropriate forum for rehashing previously rejected arguments or arguing matters that could have been heard during the pendency of previous

motion." *Caisee Nationale de Credit Agricole v CBI Indus, Inc* 90 F 3d 1264, 1270 (7th Cir 1996). It is well-established that motions for reconsideration "serve limited function." *Id* at 1269." (App C.1)

(h) "Denial of amendment is appropriate when a. amendment would be futile. *Villars v kubiowski*, 128 F Supp 3d 1039, 1043 (ND Ill 2015). Therefore, Endencia's request to amend her complaint and add additional defendants through an "intervenor complaint" is denied."

(i) *Endencia v APA, IDFPR et al* 19-cv-3161 by Judge Rowland on Oct 7, 2019 (App C.8)

" The court accepts as true all of Plaintiff's well pleaded facts and draws all permissible inferences in Plaintiff's favor. *See eg Fortress Grand Corp v Warner Bros Entm't Inc*, 763 F 3d 696, 700 (7th Cir 2014)" (App C.8)

A motion to dismiss tests the sufficiency of a complaint, not the merits of the case. *Gibson v City of Chicago*, 910 F 2d 1510, 1520 (7th Cir 1990). "To survive a motion to dismiss under the 12(b)(6), the complaint must provide enough factual information to state a claim to relief that is plausible on its face and raise a right to relief above the speculative level." *Hollywood v Massage Envy Franchising LLC* 887 F 3d 329 (7th Cir 2018) (quotations and citation omitted). *See also* Fed R Civ P 8(a)(2) (requiring a complaint to contain a "short and plain statement of the claim showing that the pleader is entitled to relief"). A court deciding a Rule 12(b)(6) motion accepts plaintiff's well pleaded factual allegations as true and

draws inferences in plaintiff's favor. *Fortres Grand Corp*, 763 F 3d at 700. A plaintiff need not plead "detailed factual allegations", but "still must provide more than labels & conclusions or a formulaic recitation of the elements of a cause of action for her complaint to be considered adequate under Federal Rule of Civil Procedures 8." *Bell v City of Chi*, 835 F 3d 736, 738 (7th Cir 2016) (citation and internal questions marks omitted). Dismissal for failure to state a claim is proper "when the allegations in a complaint, however true, could not raise a claim of entitlement to relief." *Bell Atl Corp v Twombly*, 550 US 544, 558, 127 S Ct 1955, 1966 (2007) (App C.9)

Deciding the plausibility of the claim is a "context-specific task that requires the reviewing court to draw on its judicial experience and common sense." *McCauley v City of Chi.*, 671 F 3d 611, 616 (7th Cir 2011) quoting *Ashcroft v Iqbal*, 556 US 662, 679, 129 S Ct 1937, 1950 (2009)). In addition, the Court construes the *pro se* complaint liberally than astringent standard than lawyer-drafted pleadings. *Cesal v Moats*, 851 F 3d 714, 720 (7th Cir 2017).⁴

"[T]he party invoking federal jurisdiction bears the burden of demonstrating its existence." *Boutte v Nw Med Found* 276 F App 490, 491 (7th Cir 2008) (citation , and quotations omitted). (App C.9)

Mueller v Apple Leisure Corp 880 F 3d 890. 895 (7th Cir 2018) ("This rule is a liberal one - especially where...the plaintiff does not contest the validity or authenticity of the extraneous materials.") In addition, the Court may "take

judicial notice of court filings and other matters of public record when accuracy of those documents reasonably cannot be questioned." *Parungao v Cmty Health Sys*, 858 F 3d 452, 457 (7th Cir 2017) (App C.10)

(j) "IDFPR is immune from Endencia's lawsuit. IDFPR, as a state agency, is an arm of the State for the purpose of the Eleventh Amendment. See *Kroll v Bd of Trustees of Univ of Illinois*, 934 F 2d 904, 907 (7th Cir 1991) ⁵ As another court in this district recently explained: "The Eleventh Amendment bars [Plaintiff's] claims against IDFPR defendants because IDFPR is a state agency..." *Li v Ill Dep't of Fin & Prof'l Regulation*, 2018 US Dist LEXIS 48734 at *7-8 (ND Ill Mar 23, 2018)

None of Endencia's allegations show that any exception to IDFPR immunity applies here. " (App C.10)

"The *Ex parte Young* doctrine, which allows state official to be sued if plaintiff is requesting prospective equitable relief for ongoing violations of law, does not apply because Endencia requests monetary damages, not an injunction, and she does not allege an ongoing violation of law. *Ex parte Young*, 209 US 123, 159-60 (1908) (App C.7)

(k) "Denial of an amendment is appropriate, however, when an amendment would be futile. *Villars v Kubiatowski* 128 F Supp 3d 1039, 1043 (ND Ill 2015). An amended complaint is futile if it asserts the same facts, asserts a previously determined claim, fails to state a valid theory of liability

or could not withstand a motion to dismiss. *Id* (citing *Bower v Jones*, 978 F 2d 1004, 1008 (7th Cir 1992) "Courts are within their discretion to dismiss with prejudice where a party does not make a showing that the party might cure the defects in the complaint" *Haywood*, 887 F 3d at 335; *see also li*, 2018 US Dist LEXIS 48734, at *17(ND Ill Mar 23, 2018". (App C.13)

(l) "Complete diversity of citizenship is required under 28 USC § 1332, meaning no plaintiff is a citizen of the same state as any defendant. *See McCready v eBay Inc*, 453 F 3d 882, 891 (7th Cir 2006). Indeed her request to add defendants appears to add 3 Illinois defendants (Dkt 29) Endencia alleged that the Court has jurisdiction under "FRAP 23(A) and B(2)". (Compl ¶ 2) But she does not assert any allegations about the class she seeks to represent or how other potential plaintiffs are similarly situated, nor did she file any motion to certify a class." (App C.14)

(m) "Even if APA had not raised the issue, the Court could invoke claim preclusion and sponte, *Brooks, Ngwenhya v Indianapolis Pub Sch*, 2019 US App LEXIS 26639, at *4 (7th Cir Sep 4 2019) (district court may invoke claim preclusion *sua sponte*" (App C.14)

"*Parungao v Cmty Health Syst* 858 F 3d 452, 457 (7th Cir 2017) (internal citations & quotations omitted). Endencia's claim against Dr Henry, though hard to decipher also "sounds in psychiatric malpractice, as in Illinois case. Claim preclusion bars the claim. *See Li*, 2018 US Dist LEXIS 48734 at *17 (finding claim preclusion barred plaintiff's actions against two defendants even though they had

not appeared in response to the complaint)." (App C.15)

(n) *Endencia v APA et al* 19-3170, US Appeals, 7th Cir "*See United States v Boliaux*, 915 F 3d 493, 496 (7th Cir 2019) (if an appellant loses in the district court on multiple grounds, appellant must contest all on appeal). Nor does the brief address the district court's determination that any amendment to Endencia's complaint would be futile, commenting that the amended complaint "is mor unintelligible than her first complaint". (App C.18)

(o) *Endencia v Rush Behavioral Health* 2014 IL App (1st) 132129 Order entered 12/2/2014

"¶ 13 Plaintiff's mere listing of conclusory and confusing allegations or error is not argument and does not satisfy the requirements of Illinois Supreme Court Rule 341(h)(7) (eff Feb 6, 2013). *Vancara v Karis* 238 Ill 2d 352, 369-70 (2010). Plaintiff's *pro se* status does not excuse her from complying with supreme court rules governing appellate procedure (*Coleman v Akpakpan*, 402 Ill App 3d 822, 825 (2010), and she is expected to meet a minimum standard before this court can adequately review the decision of the circuit court (*Rock Island County v Boalbey*, 242 Ill App 3d 461, 462 (1993)). Plaintiff has not done so here." (App K.9)

*3 ¶ 14 That said, striking an appellate brief, in whole or in part, is a harsh sanction, and one which we will undertake only where the litigant's violation of the rules hinders our effective appellate review of the case.

Hall v Naper Gold Hospitality LLC, 2012 IL App (2d) 111151, (App K.10)
(k) "O'Casek v Children's Home & Aid Society of Illinois 229 Ill 2d 421, 436 (2008) However, we review a trial court's dismissal of a complaint with prejudice due to plaintiff's failure to comply with section 2-622 of the Code for an abuse of discretion. *Hobbs v Lorenz*, 357 Ill App 3d 566, 569, (2003) An abuse of discretion will be found only where no reasonable person would take the view adopted by the court. *Fennell v Illinois Central RR Co* 2012 IL 113812, ¶ 21." (App K.10)

*4 ¶ The term "medical, hospital, or other healing art malpractice" must be broadly construed. *Woodard v Krans*, 234 Ill App 3d 690, 703 (1992), citing *Bernier v Burris* 113 Ill 2d 219, 226-27 (1986). In determining whether the section 2-622 certificate requirement applies to a particular case, courts look at the following factors: (1) whether the standard of care involves procedures not within the grasp not within the grasp of an ordinary lay juror; (2) whether the activity in question was inherently one of medical judgment; and (3) the type of evidence that would be necessary to establish plaintiff's case. *Jackson v Chicago Classical Janitorial & Cleaning Service* 355 Ill App 3d 906, 909 (2005). (App K.11)

" It has been held that where determining the standard of care requires distinctive

medical knowledge or principles, however basic, plaintiff must comply with section 2-622. *Woodard* 234 Ill App 3d at 705-06.... See *Jackson* 355 Ill App 3d at 911 (finding that the specialized knowledge and skill acquired by occupational therapists is not within the grasp of an average lay juror.) (App K.12)

*5 ¶ 21 The third and final factor is the type of evidence that would be necessary to establish plaintiff's case. In general, in a medical malpractice case, a plaintiff must offer expert testimony to establish the applicable standard of care, unless the subject or treatment is so common that a lay person could readily understand it.

Jackson 355 Ill 3d at 912, citing *Kolanowski v Illinois Valley Community Hospital* 188 Ill App 3d 821, 824 (1989). (App K.13)

VII Jurisdiction

I am seeking a review of the Court of Appeals Order dated May 11, 2022, (App A) in On May 11, 2022, the pursuant to Rule 14 .1 (e)(i)

Psychiatry is NOT a healing art, but medical consumer fraud, 18 USC §1347. Dr Henry's psychiatric report caused the indefinite suspension of my veterinary license, my source of livelihood, when there is no evidence of impairment. I exhausted all remedies in state court & district courts. Following Dr Henry's treatment plans *will cause impairment*.

(2) Diversity of Citizenship. APA & ADT do their business in various areas of USA The Knox Co is in Arizona. Dr Joel Prince Sr is in Knoxville, TN. Case occurred in Illinois. In pursuant to S Ct Rule 29.4(b), the Solicitor General is served.

VIII Stages

1. Court of Appeals No 22-1229 order 5/11/2022
Re: Endencia Exec Committee Presiding 1:22-cv -00824 (App B)
2. Endencia v APA, IDFPR et al 1:21-cv-02360 1/11/2022 Rooker-Feldman
Doctrine to US Sup Court(App C.1)
3. Notice of Appeal filed on Feb 10, 2022 (App D)
4. Endencia v Henry et al 1:18-cv-5477 order dismissed 10/24/2015.
5. Endencia v IDFPR et al 1:17-cv-3306 order. Dismissed lack of 735 ILCS
5/2-622 certificate 5/24/2017; Court of Appeals 17-2256 dismissal
order 1/3/2018
6. Endencia v IDFPR et al 1:17-cv-02045
7. Endencia v Rush Behavioral Health 12 L
011388. Cir Ct Cook County. Judgment
dismissed for lack of 735 ILCS 5/622 affidavit; refused consumer fraud
theory for psych entered July 1, 2013.
8. Endencia v Rush Behavioral Health No 13- 21299 -U App 1st Div 1
2/2/2014. IL App sounded malpractice but failed to submit affidavit section
735 ILCS 5/2-622
9. Endencia v Rush Behavioral Health 15-444 IL S Ct, Dismissed Nov 30,
2015, US Lexis 7658
10. Endencia v Henry et al 16 L 63072

11. Endencia v ADT case transferred to District court in 1:08-cv-04541 case dismissed because of ADT's exculpatory clause in contract Oct 28, 2008. Court of Appeals
12. IDFPR Review: IDFPR v Endencia 2005-01942. Suspension of veterinary license entered on Aug 2008. (App K))

IX Constitutional Regulations

Statutes	App Page
225 ILCS 115/3 Define Impaired Veterinarian	M.1
720 ILCS 5/12c-5 Child Endangerment	M.1
735 ILCS 5/2-622 (a) (1) Healing Art Malpractice	M.1
Local Statute	
916.1 Gen Key box Village of Streamwood ¹ Key boxes shall be provided in all buildings	
** Pampered Pet Veterinary Service key box was installed by Village of Streamwood in the back of outside premises, unmonitored. **	
18 USC 1347 Health Care Fraud	M.2
18 USC 241 Conspiracy Against Rights	M.4
18 USC 242 Deprive Rights Under Color Law.	M.3
42 US Code 1983 Deprive Civil Rights	M.3
Fed Rules of Evidence 406	M.3

X Definitions

Medicalization is [a prank] by psychiatrists where human conditions & problems are defined as psychiatric disorders. Treatment plan goals are to change behavior by altering the brain.

XI Statement of the Case

A. Review of Endencia v ADT 1:08-cv-04541 Order 10/28/2008; ADT has exculpatory clause in customer contract under "Terms & Conditions" that prevents liabilities. Courts below honor this contract. ADT employees are responsible for theft & break-ins. *See 1:08-cv-04541 Doc # 15 PageId #73 & Document # 9 PageId #55-56, 58-59*, In Mar 2005: (1) ADT's own employees, Streamwood Police (James Keegan, & Dr Joel Prince, Mandarino et al) staged break-in & are responsible for cumulative theft from 1999-2007 with PPVS loss of \$35k+ (2) In Mar 2005, they staged break-in that led to indefinite suspension of my veterinary license (3) ADT Security system can be turned ON & OFF from customer & ADT's end. If system was turned OFF from ADT's end, it does not trigger the customer's alarm system. See Case 1:08-cv-04541 Doc 9 PageId 55.

B. The Knox Co recommends & trains law enforcement to create village ordinance requiring business owners (optional for homeowners) to provide keys to the fire department.

NOTE: Professional locksmiths do NOT need keys to unlock the

premises, but an alarm system would be triggered, unless turned OFF or alarm system does not exist at all. Prince became ADT dealer to deal with security system & hired police as employees

On Jan 2006, Dr Ludwig, , sent me an order requiring psychiatric evaluation, with PMH Partner, Dr Henry, to be paid by IDFPR. App G.1

C. Review of Psychiatry as health care fraud 18 USC 1347. The architecture of psychiatry evolved under the leadership of APA. The training in schools of psychiatry is defined by APA &

D. Indefinite suspension of my veterinary license

E. Money Laundering by Dan Maloney & accounting fraud PMH

Parters v The Pampered Pet Veterinary Service 03 L 5915) Later, Dr Prince & Dr Coyne had to write off the debt in their IRS statements for about \$500k

F. Review of former Psychotherapist of Wheaton Youth Outreach, Dan Benyousky ("Dan B.") & psychiatric patient Nathan Hamacek's ("Nathan H") `actions that led to the death of Altessia's unborn child, loss of affection between plaintiff & daughter, Altessia, with the utilization of Teresita Endencia, DCFS of Glen Ellyn, Bill Maffy, Wendy Vaughn & Judge Fabiano's Order, Estate of Altessia Endencia 2009 P 378 Order Nov 2009. Dan B, instituted the no talk policy between myself & my daughter since July 2009. Since then, till today, we have not talked to each other. Fabiano reinforced this (App L.1). No review of US Court of Appeals

XI. Reasons for Granting the Writ. (Complaint 1)

Count 1. PMH-ADT- Streamwood Police Burglaries

A. Elements of Civil RICO & ADT Fraud 18 USCA 1031(a)(2)

(a) Pattern of activity in Illinois & other states (Knox Co & ADT Security). Rules of Evidence 406.

(a.1) Exculpatory clause in customer contracts preventing liability for ADT security failures.

(a.2). ADT hires local law enforcement to monitor the system & provide false sense of "safe" security

(a.3) ADT Security System that can be turned ON and OFF at ADT's (police) & customer's end.

(a.4) (Unexplained) burglaries with no alerts from ADT & police, no forced entries, staging of crime PPVS lost \$35k in cumulative theft from 1999-2007.

(i) Mar 2005, PMH-ADT partners staged break-in at PPVS. Partners Georgianne Ludwig, DVM & IL Vet Licensing chair hired & paid PMH Partner, Dr Henry, to cause my veterinary license to be suspended.

(a.6) Inventory is sold as part of their business or
sold through internet such as Ebay & Amazon.

(a.7). Unexplained funds are deposited in business accounts to inflate value of business, See case 1:21-cv-02360 Doc 1 pageid 60.

(b) culpable persons with requisite *mens rea*

(b.1) Dr Joel Prince Sr-Dan Maloney-Dr Henry (PMH Partners) sold Barrington Road Animal Clinic to me with inflated business value.

(b.2). Coincidental rampant thefts of veterinary hospitals occurred in Illinois & other states where Dr Prince Sr resided.

(c.1). The Knox Co making recommendations of creating village ordinance requiring keys to be provided to local law enforcement in USA.

(c.2) Enterprise of ADT, PMH Partners, local law enforcement as ADT employees involved in monitoring their victims & theft in Illinois & other states. ADT Security System grandfathered during the sale of BRAH. Accounting fraud and thefts occurring in Streamwood IL and other areas of IL (and other states.)

(d) Diversity of defendant Dr Joel Prince Sr resides in various states. Coincidental rampant thefts in animal hospitals & other ADT-Police monitored businesses.

RICO cases: Salinas v United States 522 US 52

US v Marmolejo 89 F 3d 1185 (1996)

ADT Cases

Abacus Fed Savings Bank v ADT 18 NY 3d 675

ADT Co v Brink's Inc 380 F 2d 131 (1967)

Endencia v ADT 08 C 4541

Inter'l Distributing Corp v ADT 569 F 2d 136 (1977)

Synex Corp v ADT 928 A 2d 37 (2007)

Count Two. Fraud Upon Administrative Court

utilizing fabricated evidence of Dr Henry & ADT employed Streamwood Police Dept.

IDFPR v Endencia 2005-01942. Admin Law Judges

James Jeffrey Canavan & Daniel E Bluthardt & IL Veterinary Medical Board utilized PMH Partner, Dr Henry. Psychiatry is health care fraud.

(a.1). Cumulative theft problems despite presence of ADT Security, costing PPVS about \$35k-\$45k. See *Endencia v ADT 1:08-cv-04541 Doc # 9 PageId # 55-56* & Streamwood Police Report of Papay (App E.3). Security System turned off at ADT's end to enter premises.

(a.2) March 2005. Staged break-in of PMH-Streamwood Police break-in to lead me to call police on March 6, 2005. Police created reports suggestive of psychological impairment. James Keegan calls IDFPR.

(a.3) Jan 2006, Ludwig, DVM sends an order requiring PMH Partner, Dr Henry to perform psychiatric evaluation, to be paid by them. (App G)

(a.4). Dr Henry medicalized Streamwood Police Report that led to the indefinite suspension of my veterinary license. I was unable to get 735 ILCS 5/2-622 certificate because psychiatrists corroborate with each other's reports.

(a.6) Admin Judge Bluthardt erred in indefinitely suspended my veterinary license when there is no evidence of impairment ¶ 8 Appendix K.2. IDFPR Admin Judges refuse to order Streamwood Police investigated for cumulative theft at PPVS.

(a.7) Other psychiatrists corroborated with Dr Henry's report, causing difficulty for me to procure 5-622 certificate & malicious loss of affection between myself & daughter, Altessia that caused the loss of her child.

No absolute immunity of Judge Canavan & Bluthardt:

(1) Suspension of my veterinary license when there was no evidence of impairment

(2). Dr Henry is a PMH-ADT-Streamwood Police as ADT employees Partner involved in burglaries & other crime. He fabricates evidence of impairment (medicalization).

(3) Psychiatry is health care fraud. Psychiatrists share & support each other's diagnosis as norm.

(4) IDFPR paid Dr Henry.

Hoska v United States Army 677 F 2d 131.

DAG Jewish Direct 210 WL 321922292

Frye v US

Herring v USA 04-427 3rd Court of Appeals

Jimenez et al v City of NY 1:2014-cv-02994

Lawrence v City of NY 1:2015-cv-08947

McMunn 191 F Supp 2d at 462

Shan Gold 2006 WL 71672

Count 3. Fraud Upon Fabiano's court.

Count 4 Unborn Victims of Violence Act. Public Law 108-212 & Psychiatric Hospitalization Billing Fraud.

Count 5. Malicious alienation of affection between myself & Altessia to cause loss of Altessia's child

Count 6. Attempted murder by Rockford Police *People v State of IL v Endencia* 1-2009-CF-000228.

Nathan H instructed Teresita E to call Rockford Police when I tried to take Altessia home in July 2008.

(a.1) Nathan H, then 18, committed statutory rape when he got Altessia, then 16 within 4 months of meeting her. He got her pregnant & did not want the child;

(a.2) Nathan H is a psychiatric patient with history of burglaries & provide locksmith services.

(a.3) Nathan H was instructing Altessia to create havoc at home with disorderly conduct and call Bartlett Police & portray child abuse & run away from home.

(a.4) He was able to get Altessia out of my home with Dan B.'s help with the pretense Altessia needed a short vacation & keep her "safe".

(a.5) Psychotherapist, Dan B, supported Nathan H's goal in killing the unborn child by alienating me from my daughter with no talk policy since July 2009. Without my knowledge, he resided with Teresita E (my mother) to enforce the no talk policy & subjected her to daily beliefs she is a product of child abuse.

(a.6) Bill Maffy & DCFS of Glen Ellyn made almost daily contact with Altessia

with visits or phone calls telling her she was a product of child abuse

(a.7). When I tried to take Altessia home in July 2009, they called Rockford Police where I was almost killed by police.

(a.8) When I brought Altessia's belongings to Rockford, they instructed her to throw everything she owned except for the dress she wore. It was never replaced.

(Similar incident occurred to me in Dec 2015 where sheriff came with no court order, stealing my personal, business & real property. Altessia did not help because Wheaton Youth Outreach found her a job out of state & no-talk policy)

(a.9) Filed false suicide report to Bartlett Fire Dept had me institutionalized against my will at Alexian Bros Behavioral Health, Hoffman Estates IL. I refused psychiatric evaluation. After I left the facility, the psychiatrist, Dr Chadha created psychiatric record based on Dr Henry's report and gave it to Nathan which caused my daughter to lose her child. I was given a psychiatric hospitalization bill for almost \$7,000.

(a.10) Wendy V received Dr Chadha's fabricated report & utilized it in *Estate of Altessia Endencia* (App L1). I was not allowed to see the report. She produced a child witness I never met before (we lived in Bartlett IL, not Rockford). All objections at Fabiano's court were over-ruled.

Judge Fabiano & Wendy V seeking absolute immunity bears the burden. Case was in probate court when I am alive & they lacked subject matter jurisdiction & lack of territorial jurisdiction since Altessia & I were residents of

Bartlett IL. The fabricated evidence of Chadha & child witness.

Cases: *Wearry v Foster* 2022 BL 153489; 5th Cir 20-30406

Mitchell v Forsyth 472 US 511, 530; 105 S Ct 2806; 86 L'Ed 2d 411 (1985)

Hampton v Chicago 484 F 2d 602, 608 (CA7 1973)

Count 7. In pursuant to 18 USC § 1347, USA (IL) erred in licensing psychiatrists. Elements of Health Care Fraud, in pursuant to Federal Rules of Evidence 406^{M.3}, (a) Psychiatrists (as trained in schools of psychiatry) knowingly & willfully create belief psychiatric disorder exists by medicalization to patients of any age that require dangerous [lifetime] habit forming treatment plans such as electroconvulsive therapy, psychogenic drugs & lobotomies. These cause serious neurological side effects & thought disturbance, leading to unemployment, disability & homelessness. Treatment plans are for financial gain (Medicaid; health insurance fraud & family resources are drained) Each year, US taxpayers pay about \$42 billion on psychiatric fraud (Doc 80 Appendix 19, Psychiatric News).

(b) Sharing of psychiatric records among themselves for uniformity of diagnoses & keep patients in their system. I was unable to get a 735 ILCS 5/2-622 certificate

(c) Laws are created to support psychiatry & referrals. Children are not able to go to school unless drugged. My veterinary license was indefinitely suspended unless drugged up. These drugs cause impairment.

(d) Utilization of DSM Multi-axial Assessment Program (or other similar

forms) as a writing template.

(e) Psychiatrists are associated by perpetrators of abuse, financial gain (public aid) & crime. They are led to commit suicide or are killed through the medical power of attorney, at the influence of psychiatrists.

Impact of the psychiatric stigma in youth's lives.

People v Hanson 9689 S Ct IL *Kirk v Michael Reese Hospital* 513 NE 387;

The US Dept of Education has been negligent in not monitoring their curricula.

Psychiatry is constitutional violation for deprivation of rights, in pursuant to 42 US Code § 1983.

Case: *Barefoot v Estelle*, 463 US 880, 103 S Ct 3383, 77 L Ed 2d 1090.

Psychiatric Drugs Side Effects Cases:

Aranda v Com Psych Centers of Ok 945 F Supp 1485

Barnhart v US 884 F2d 295;

Boswell v State 610 So 2d 670

Brancaccio v State 698 So 2d 597;

Slater v Nat Med Center 962 SW 2d 228

People v Hanson 9689, S Ct of IL

XIII Statutory Time Limit

There is no statutory time limit for fraud.

a. Continuing psychiatric fraud

b. Continuing theft of law enforcement that may be associated with village

ordinance requiring keys be provided to law enforcement & [ADT] Security

Systems

XIV The Case is Important to put an end by injunction order:

(1) Psychiatric medicalization / labelling & lifetime treatment plans that cause brain pathology are civil rights violations 42 USC § 1983^{M.3}.

Psychiatrists should train people how to lead successful, productive, loving lives, such as teachings of Napoleon Hill, Dale Carnegie, Jesus Christ. See <https://www.cchr.org> & <https://www.breggin.com>

Psychiatrists should be accountable for health care fraud to the public.

(2) Non enforcement of ADT's exculpatory clause in customer contracts. ADT Security Systems with local law enforcement as employees should be accountable for existing criminal activities since they are perpetrators of crime.

(3) US Dept of Education should monitor the curricula of schools of psychiatry.

XV Conclusion

IDFPR Admin Judges Canavan & Bluthardt erred in indefinitely suspending my license without evidence of impairment^{M.1}. (App K.3) Psychiatrists corroborate

with each other's psychiatric reports, for uniformity in multiple opinions that I was unable to get the 735 ILCS 5/2-622 certificate.

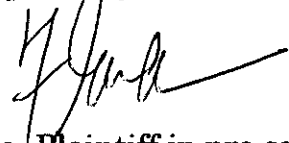
I am asking for prospective order to reinstate my veterinary license.

An injunction order to stop continuing health care fraud by psychiatrists' use of medicalization & current unnecessary treatment plans of changing a person's behavior by altering the brain, leading to impairment.

I pray that all defendants be collectively responsible for back pay from Sept 1, 2008 (I was earning \$10,000 / month with Escanaba Animal Hospital just prior to suspension of my veterinary license), \$37,000 inventory losses from 1999-2007, plus court & collection costs, in pursuant to 18 USC § 1031(h)(1)&(2)

I pray for help in unity between my daughter and myself.

Respectfully Submitted,



Frances Endencia, Plaintiff in pro sec

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(630) 656 2854. Fendencia @ gmail.com

Penalty of Perjury

In pursuant to 28 US Code § 1746 (2), I declare that the above is true and correct based on my personal experience, knowledge and belief. Executed in 10/15/ 2022

Appendix

- A. Jurisdiction: Endencia v APA et al Court of Appeals No 22-1229 order entered May 11, 2022.
- B.1 Endencia v Behavioral Health Care Assoc 09 M 341 order entered 1/29/2010
- B.3 Endencia v Behavioral Health Care Ass et al IL App Ct 1-10-1319 Order 10/28/2010
- C.1 Endencia v PMH Partners, APA et al. Order entered Jan 11, 2022. (File # 82) 1:21-cv-0236O
- C.6 My Response
- C.8. Endencia v APA et al 1:19-cv-03161 Judge Mary Rowland's Order Oct 7, 2019
- C.20 Endencia v APA et al 10-3170 US Ct of Appeals Order 6/29/2020
- D Notice of Appeal Doc # 86 Feb 10, 2022
- E.1 Frances' Perspective #1 A staged break-in.
- E.2 Mar 2005. Streamwood Police Report
- F.1 Frances' Perspective #2
- G.1 Jan 18, 2006, Dr Ludwig's (DVM) order for psychiatric evaluation with Dr Henry
- H.1 Frances' Perspective #3.
Nov 29, 2007. Psychiatric diagnostic tests, word & picture games,