

**IN THE CIRCUIT COURT OF THE SIXTEENTH JUDICIAL CIRCUIT
KANE COUNTY, ILLINOIS**

JANE DOE,)
Plaintiff,)
v.)
DAVID HANSON, D.C.,)
HANSON FAMILY CHIROPRACTIC, S.C., and)
PMI VENTURE, L.L.C.)
Defendants.)
Case No.: 2025-LA-000690
**PLAINTIFF DEMANDS TRIAL
BY JURY**

Clerk of the Court
Kane County
12/23/2023

Sheriff Berrios
Clerk of the Circuit Court
Kane County, Illinois

COMPLAINT AT LAW

Plaintiff, JANE DOE, by and through her attorneys, CLIFFORD LAW OFFICES, P.C.,
complaining of Defendants, DAVID HANSON, D.C., HANSON FAMILY CHIROPRACTIC,
S.C., and PMI VENTURE, L.L.C., states as follows:

1. This Complaint arises from a clear pattern of a chiropractor's non-consensual video recording of patients—ranging from young children to adults—at the clinic operated by Defendants David Hanson, D.C., ("Hanson") and Hanson Family Chiropractic, S.C. ("Hanson Clinic") (collectively, "Hanson Defendants") in the building located at 1928 W. Wilson St., Batavia, Illinois ("Premises") owned by Defendant PMI Venture, L.L.C. ("PMI").

2. Using cameras concealed throughout the office, including within vents and/or fans, the Hanson Defendants captured patients in various stages of undress, including fully nude, without knowledge or consent.

NOTICE

BY ORDER OF THE COURT THIS CASE IS HEREBY SET
FOR CASE MANAGEMENT CONFERENCE BEFORE

Dalton, John G

Please see our website for the court date at
<https://kanecoportal.co.kane.il.us/portal>

FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR AN ORDER OF DEFAULT BEING ENTERED

3. Many recordings appear to have been made in a room used for red-light and near-infrared light therapy, where patients reasonably expected privacy and where disrobing or partial disrobing was common as part of treatment.

I. PARTIES

4. On or before November 5, 2025, Plaintiff Jane Doe (“Plaintiff”) was at all relevant times a resident of DuPage County, Illinois, and was a patient of Hanson Family Chiropractic in Batavia, Kane County, Illinois.

5. On or before November 5, 2025, upon information and belief, Plaintiff was recorded in a private patient area while undressed without her knowledge or consent.

6. Plaintiff is proceeding under a pseudonym and will file a motion for leave to do so for good cause upon a schedule to be set by the Court.

7. On and before November 5, 2025, Defendant Hanson was, at all relevant times, a natural person residing in Kane County, Illinois.

8. On and before November 5, 2025, Hanson owned, operated, controlled, directed, and/or controlled the Hanson Clinic and participated in, authorized, and/or disregarded the covert recording scheme described herein.

9. On and before November 5, 2025, Defendant Hanson Clinic was an Illinois service corporation with its principal place of business in Batavia, Kane County, Illinois.

10. On and before November 5, 2025, the Hanson Clinic owned, operated, controlled, managed, and/or profited from the clinic where the unlawful recordings occurred.

11. On and before November 5, 2025, the Hanson Clinic acted through its officers, actual and/or apparent agents and employees, including Hanson.

12. On and before November 5, 2025, PMI was an Illinois limited liability company with its principal place of business in Naperville, Illinois.

13. On and before November 5, 2025, PMI owned, operated, controlled, managed, and/or profited from the building located at 1928 W. Wilson St., Batavia, Kane County, Illinois from which the Hanson Clinic operated.

14. On and before November 5, 2025, PMI leased the Premises to the Hanson Clinic.

15. At all times relevant herein, as the owner, operator, and manager of the Premises, PMI retained control over all aspects of the premises, including its structural components, common areas, building systems, HVAC systems, electrical, and ventilation, and/or access to the premises.

II. JURISDICTION AND VENUE

16. This Court has jurisdiction pursuant to 735 ILCS 5/2-101 because Defendants reside, conduct business, and committed statutory violations and tortious acts in Kane County, Illinois.

17. Moreover, the Hanson Clinic and PMI are registered to conduct business in Illinois, and Hanson is licensed to and did practice chiropractic medicine in Illinois.

18. Venue is proper in Kane County because one or more Defendants reside in this county and committed the statutory and tortious violations alleged herein in Kane County.

III. FACTS COMMON TO ALL COUNTS

19. On and before November 5, 2025, the Hanson Defendants operated a chiropractic clinic in Batavia, Illinois, where patients, including Plaintiff, received services such as chiropractic adjustments and red-light/near-infrared therapy.

20. On and before November 5, 2025, the Hanson Defendants placed cameras at multiple locations within the clinic, including but not limited to within vents and/or fans and/or other fixtures, with the design and purpose of evading detection.

21. On and before November 5, 2025, unbeknownst to patients, and without patients' knowledge or consent, including Plaintiff's, the Hanson Defendants surveilled and recorded video of patients in various stages of undress, while said patients were disrobing, receiving treatment that necessitated disrobing, or otherwise present in private treatment rooms, including a red-light therapy room.

22. On and before November 5, 2025, the Hanson Defendants placed, operated, and controlled surveillance cameras so as to capture intimate body areas and patient nudity.

23. On and before November 5, 2025, the Hanson Defendants designed and implemented surveillance and recording practices and routines so as to capture patients' intimate body areas and patient nudity.

24. On and before November 5, 2025, patients at the clinic, including Plaintiff, reasonably expected that treatment rooms, changing areas, and any rooms where disrobing occurs would be private and free from visual recording.

25. On and before November 5, 2025, the Hanson Defendants owed a duty of care to Plaintiff, who was at all relevant times a patient and business-invitee.

26. On and before November 5, 2025, the Hanson Defendants failed to provide any adequate disclosure that surveillance and video recording was occurring on the premises, including in private patient areas; failed to obtain consent; and failed to implement privacy and security safeguards customary in clinical environments.

27. At all relevant times, the Hanson Defendants' conduct violated well-established Illinois privacy rights, breached duties owed by health-care professionals to their patients, and caused emotional distress, humiliation, fear, anxiety, sleep disturbance, and other harm to Plaintiff.

28. On and before November 5, 2025, PMI owned, operated, controlled, managed, and/or profited from the Premises and, through its actual and/or apparent agents, employees, and/or contractors, exercised control over building systems, including ventilation grilles, fan housings, ceiling plenums, electrical conduits, and related fixtures within tenant spaces and common areas.

29. On and before November 5, 2025, recording devices were installed within vents, fan housings, and other fixtures at the Premises, with associated wiring and/or modifications to building systems.

30. On and before November 5, 2025, PMI knew or, in the exercise of reasonable care and inspection, should have known of these unlawful and dangerous conditions, including unusual alterations, penetrations, or cabling in building systems, and failed to take reasonable steps to inspect, correct, prevent, and/or warn; to enforce lease prohibitions on unlawful activity and/or unauthorized alterations; and/or to otherwise protect lawful invitees on the Premises.

31. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C., David Hanson, D.C., and PMI Venture, L.L.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT I
INTRUSION UPON SECLUSION/INVASION OF PRIVACY
(Against the Hanson Defendants)

32. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

33. At all times relevant herein, the Hanson Defendants intruded, physically and otherwise, upon the private affairs and/or seclusion of Plaintiff by surveilling and recording her in private spaces where nudity and clinical treatment occurred.

34. Such intrusion would be highly offensive to a reasonable person.

35. At all relevant times herein, Hanson and/or other personnel acted within the scope of employment and/or with actual and/or apparent authority.

36. At all times relevant herein, the Hanson Clinic is vicariously liable for the acts and/or omissions of its officers, actual and/or apparent agents, and employees.

37. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT II
INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS
(Against the Hanson Defendants)

38. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

39. At all times relevant herein, the Hanson Defendants' conduct including but not limited to surveilling, recording and collecting images of patients, including minors, without

consent, in necessarily private settings and in the course of receiving clinical and/or wellness treatments, was extreme and outrageous.

40. At all times relevant herein, the Hanson Defendants intended to cause and/or acted in reckless disregard of the probability of causing emotional distress.

41. At all times relevant herein, Hanson and/or other officers, actual and/or apparent agents, and employees, acted within the scope of employment and/or with apparent authority.

42. At all times relevant herein, the Hanson Clinic is vicariously liable for the acts and/or omissions of its officers, actual and/or apparent agents, and employees.

43. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT III
NEGLIGENCE/NEGLIGENCE PER SE
(Against the Hanson Defendants)

44. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

45. At all times relevant herein, the Hanson Defendants, by and through their officers, actual and/or apparent agents, and employees, owed duties to patients to provide a safe, private clinical environment; to refrain from surreptitious recording; to comply with Illinois privacy and recording laws; and to implement reasonable privacy safeguards in health-care settings.

46. At all times relevant herein, the Hanson Defendants by and through their officers, actual and/or apparent agents, and employees, breached these duties in the following ways:

- (a) installing cameras concealed from patients and business-invitees;
- (b) surveilling and recording Plaintiff without her consent;
- (c) failing to supervise and train agents and/or employees in a manner consistent with best practices for clinical and wellness settings; and
- (d) failing to implement and/or enforce privacy protections for patients and business-invitees.

47. At all times relevant herein, the Hanson Defendants' violations of Illinois privacy and/or recording statutes constitute negligence *per se*, as such statutes are designed to protect persons like Plaintiff from the type of harm suffered.

48. At all times relevant herein, Hanson and other officers, actual and/or apparent agents, and employees acted within the scope of employment and/or with apparent authority.

49. At all times relevant herein, the Hanson Clinic is vicariously liable for the acts and/or omissions of its officers, actual and/or apparent agents, and employees.

50. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT IV
BREACH OF FIDUCIARY DUTY/CONFIDENTIAL RELATIONSHIP
(Against the Hanson Defendants)

51. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

52. A fiduciary or confidential relationship exists between health-care providers and patients. Patients entrust providers with intimate information and bodily privacy.

53. At all relevant times, the Hanson Defendants owed their patients highest duty of care and loyalty.

54. At all times relevant herein, the Hanson Defendants breached fiduciary duties by recording and maintaining images of patients without their consent, exploiting their vulnerability, and misusing clinical and wellness spaces for covert surveillance.

55. At all times relevant herein, Hanson and other officers, actual and/or apparent agents, and employees acted within the scope of employment and/or with apparent authority.

56. At all times relevant herein, the Hanson Clinic is vicariously liable for the acts and/or omissions of its officers, actual and/or apparent agents, and employees.

57. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

58. Had Plaintiff known of the Defendants' misconduct, Plaintiff would not have paid for (nor undergone) services and treatment, and Plaintiff seeks disgorgement of Defendants' ill-gotten benefits.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT V
NEGLIGENT HIRING, RETENTION, AND SUPERVISION
(Against Hanson Family Chiropractic, S.C.)

59. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

60. At all times relevant herein, the Hanson Clinic had duties to hire, retain, and supervise personnel to ensure patient privacy and compliance with law.

61. At all times relevant herein, the Hanson Clinic knew and/or should have known of the risk of privacy violations and failed to implement policies, training, monitoring, and physical

inspections that would have prevented installation of hidden cameras, surveillance, and covert recording.

62. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT VI
UNJUST ENRICHMENT
(Against the Hanson Defendants)

63. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

64. At all times relevant herein, the Hanson Defendants unjustly retained monetary benefits from patient payments made under the false premise of a lawful, privacy-respecting clinic.

65. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages, and loss of money paid to Defendants. Equity and good conscience require restitution and disgorgement.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT VII
ILLINOIS CONSUMER FRAUD AND DECEPTIVE BUSINESS PRACTICE ACT
815 ILCS 505/1 *et seq.*
(Against the Hanson Defendants)

66. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

67. At all times relevant herein, The Hanson Defendants engaged in unfair and deceptive practices by portraying the clinic as a safe, ethical, and privacy-respecting medical and wellness environment while secretly surveilling and recording patients, omitting material facts, and violating public policy.

68. At all times relevant herein, the Hanson Defendants' conduct was immoral, unethical, oppressive, and caused substantial injury to consumers that they could not reasonably avoid.

69. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages, as well as financial losses, and are entitled to all remedies under the Act, including attorneys' fees and injunctive relief.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, Hanson Family Chiropractic, S.C. and David Hanson, D.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT VIII
NEGLIGENCE AND PREMISES LIABILITY
(Against PMI)

70. Plaintiff realleges the facts from the paragraphs above as though fully set forth herein.

71. At all times relevant herein, PMI, as owner, operator, and/or manager of the Premises, owed Plaintiff, a lawful invitee of its commercial tenant, a duty of reasonable care under the Illinois Premises Liability Act, 740 ILCS 130/1 et seq., and Illinois common law, including duties to:

- (a) maintain the Premises in a reasonably safe condition;
- (b) conduct reasonable inspections;
- (c) remedy or guard against unreasonably dangerous and unlawful conditions; and
- (d) warn of latent dangers of which it knew or, in the exercise of reasonable care, should have known.

72. At all times relevant herein, PMI retained control over structural elements and building systems within the Premises, including but not limited to HVAC/ventilation housings, ceiling plenums, electrical raceways, and fixtures where concealed surveillance equipment were installed and operated.

73. At all times relevant herein, conditions existed on the Premises creating an unreasonable risk to patient privacy and safety, including concealed surveillance and recording devices placed within vents, fan housings, and other fixtures and the modifications necessary to power and transmit from those devices.

74. At all times relevant herein, PMI, by and through its actual and/or apparent agents and/or employees, knew or, through the exercise of reasonable inspections and oversight, should have known of these dangerous and unlawful conditions, including:

- (a) unusual alterations to building systems and fixtures;
- (b) unauthorized penetrations and wiring;
- (c) indicators consistent with covert recording; and/or
- (d) lease violations concerning illegal activity and alterations.

75. At all times relevant herein, PMI, by and through its actual and/or apparent agents and/or employees, breached its duties by failing to:

- (a) exercise reasonable care to inspect, discover, prevent, correct, and/or warn of unlawful recording devices and related conditions;
- (b) by failing to enforce lease provisions and building rules prohibiting unlawful alterations and illegal activity; and
- (c) by permitting the Premises to be used in a manner that foreseeably endangered patient privacy and safety.

76. As a direct and proximate result of the Defendants' willful and wanton acts and/or omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

77. PMI's conduct was willful and wanton insofar as it showed an utter indifference to and/or conscious disregard for the safety and rights of others.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against Defendant, PMI Venture, L.L.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

COUNT IX
NEGLIGENT SECURITY / FAILURE TO IMPLEMENT AND ENFORCE
REASONABLE SAFETY POLICIES
(Against PMI)

78. Plaintiff realleges and incorporates by reference the foregoing paragraphs.

79. At all times relevant herein, as a commercial property owner/manager inviting members of the public to enter for business purposes, PMI owed duties to implement and enforce reasonable security and safety policies to protect invitees from foreseeable harm, including detection of surveillance equipment in private treatment areas.

80. At all times relevant herein, it was reasonably foreseeable that surveillance devices could be concealed within vents, fan housings, ceiling plenums, and other fixtures if access and alterations were not reasonably controlled and inspected.

81. At all times relevant herein, PMI, by and through its actual and apparent agents and/or employees, breached its duties by failing to:

- (a) adopt and enforce reasonable inspection protocols for fixtures capable of harboring surveillance devices;
- (b) control keys and access to all aspects of the premises;
- (c) oversee tenant build-outs and alterations; and
- (d) respond adequately to signs of tampering or unauthorized alterations.

82. As a direct and proximate result of the Defendants' acts and omissions, Plaintiff suffered injuries of a personal and pecuniary nature, including mental and emotional damages.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendant, PMI Venture, L.L.C., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), and for any further relief that this Court deems necessary and just.

CLIFFORD LAW OFFICES, P.C.



Attorney for the Plaintiff

David F. Jasinski (ARDC No.: 6313135)
Matthew D. Moyer (ARDC No.: 6330174)
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle Street, 36th Floor
Chicago, Illinois 60602
(312) 899-9090
Fax: (312) 251-1160
DFJ@cliffordlaw.com
MDM@cliffordlaw.com