

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

JANE DOE, individually and on behalf of all others similarly situated,

Plaintiff,

V.

DAVID H. HANSON, HANSON FAMILY
CHIROPRACTIC, S.C., PMI VENTURE,
L.L.C., and JOHN DOES 1-100.

Defendants.

2025-LA-000609

Case No.
Jury Trial Demanded

Frederick Berrien
Clerk of the Circuit Court
Kane County, Illinois

11/12/2025 12:00 AM

FILED/IMAGED

CLASS ACTION COMPLAINT

I. INTRODUCTION

1. This class action arises from a shocking pattern of covert, non-consensual video recording of patients—ranging from young children to adults—at the clinic operated by Defendants Hanson Family Chiropractic, S.C. (“Hanson Clinic”) and Dr. David Hanson (“Hanson”) (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 hidden cameras placed throughout the office, including within vents or fans, the Hanson Defendants captured patients in various states of undress, including fully nude, without knowledge or consent.

3. Many recordings appear to have been made in a so-called “red light 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.

NOTICE

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

4. Defendants' conduct constitutes an egregious invasion of privacy and a profound betrayal of the basic trust that patients place in health-care professionals.

5. Plaintiff brings this action on behalf of herself and a Class of approximately two hundred (200) or more similarly situated patients (known to date) to obtain damages, restitution, punitive damages, fees and costs, and broad injunctive relief to protect patients, secure and preserve evidence, and ensure the destruction and verified deletion of all unlawful recordings not otherwise in the hands of law enforcement.

II. PARTIES

6. Plaintiff Jane Doe ("Plaintiff") is a resident of Kane County, Illinois who was a patient of Hanson Family Chiropractic in Batavia, Illinois. Plaintiff was recorded, or faces a substantial risk that she was recorded, in a private patient area while undressed without her knowledge or consent. 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. Defendant David H. Hanson ("Hanson") is a natural person residing in Kane County, Illinois. At all times relevant, Hanson owned, operated, directed, and/or controlled the Hanson Clinic and personally participated in, authorized, or recklessly disregarded the covert recording scheme described herein.

8. Defendant Hanson Family Chiropractic, S.C. ("Hanson Clinic") is an Illinois service corporation with its principal place of business in Batavia, Illinois. The Hanson Clinic owned, operated, managed, and profited from the clinic where the unlawful recordings occurred. At all times relevant, the Hanson Clinic acted through its officers, agents, and employees, including Hanson.

9. PMI Venture, L.L.C. ("PMI") is an Illinois limited liability company with its principal place of business in Naperville, Illinois. PMI owns the building located at 1928 W.

Wilson St., Batavia, Illinois (hereinafter “the Premises”) from which the Hanson Clinic operated. On information and belief, PMI leased the Premises to the Hanson Clinic. As the owner, PMI retained control over structural components, common areas, building systems (including HVAC, electrical, and ventilation), and access to perform inspections, maintenance, and repairs.

10. Upon information and belief, John Does 1–100 are persons and/or entities whose true names and capacities are presently unknown who, during the relevant period, designed, supplied, manufactured, sold, leased, installed, integrated, serviced, maintained, inspected, altered, or monitored (a) the HVAC, ventilation, fan, and ceiling systems; (b) related electrical, cabling, networking, and power components; and/or (c) the covert cameras, recording equipment, or transmission devices used to surreptitiously record or transmit recordings of Plaintiff and Class members within the Premises. These Doe Defendants include, without limitation, contractors, subcontractors, vendors, building engineers, facilities/maintenance providers, security/surveillance integrators, consultants, and their employees and agents. Each Doe Defendant is liable individually and/or vicariously (including under agency, ostensible agency, joint venture, respondeat superior, and aiding-and-abetting/concert-of-action theories) for the acts and omissions alleged herein. Plaintiffs will amend this Complaint to substitute the true names and capacities of these Doe Defendants when ascertained and allege that such amendments relate back to the filing of the original Complaint pursuant to 735 ILCS 5/2-616(d).

III. JURISDICTION AND VENUE

11. This Court has jurisdiction over Defendants pursuant 735 ILCS 5/2-209 because Defendants conduct business in Illinois, and committed statutory violations and tortious acts in Illinois. 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.

12. 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.

IV. FACTS

A. The Hanson Defendants surreptitiously recorded adult and minor clinic patients in various states of undress without their knowledge or consent.

13. The Hanson Defendants operated a chiropractic clinic in Batavia, Illinois, where patients—including minors—received services such as chiropractic adjustments and red-light/near-infrared therapy.

14. The Hanson Defendants placed hidden cameras at multiple locations within the clinic, including but not limited to within vents or fans and/or other fixtures, with the design and purpose of evading detection.

15. Without patients' knowledge or consent, the Hanson Defendants surreptitiously recorded video—often depicting patients fully or partially nude—while patients were disrobing, being treated, or otherwise present in private treatment rooms, including a red-light therapy room.

16. The Hanson Defendants intentionally designed their camera placement and recording practices to capture intimate body areas and patient nudity.

17. Patients at the clinic reasonably expected that treatment rooms, changing areas, and any rooms where disrobing occurs would be private and free from visual recording.

18. The Hanson Defendants failed to provide any adequate disclosure that video recording was occurring in private patient areas, failed to obtain consent, and failed to implement privacy and security safeguards customary in health-care environments.

19. The Hanson Defendants' conduct violated well-established Illinois privacy rights, breached duties owed by health-care professionals to their patients, and caused severe emotional

distress, humiliation, fear, anxiety, sleep disturbance, and other harm to Plaintiff and Class members.

20. Minors were among those recorded. For minor patients, the recording, storage, and any disclosure of images was especially harmful and unlawful; limitations periods are tolled for minors.

21. The Hanson Defendants stored, transmitted, or otherwise handled the covert recordings in a manner unknown to patients. Immediate injunctive relief is necessary to (a) secure and preserve all devices, storage media, and accounts; (b) prevent spoliation; and (c) ensure the verified destruction and deletion of all unlawful recordings and any derivatives.

B. Through its exercise of control over the clinic building, PMI knew or should have known of the Hanson Defendants' illegal use of surreptitious recording devices.

22. PMI Ventures owned and/or managed the Premises and, through its agents and contractors, exercised control over building systems, including ventilation grilles, fan housings, ceiling plenums, electrical conduits, and related fixtures within tenant spaces and common areas.

23. On information and belief, concealed recording devices were installed within vents, fan housings, and other fixtures at the Premises, with associated wiring and/or modifications to building systems.

24. 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, or warn; to enforce lease prohibitions on unlawful activity and unauthorized alterations; or to otherwise protect lawful invitees on the Premises.

25. As a direct and proximate result of PMI's acts and omissions, Plaintiff and Class members suffered the harms described herein.

V. CLASS ACTION ALLEGATIONS

26. Plaintiff brings this action under 735 ILCS 5/2-801 on behalf of the following

Class:

All persons who were patients at Hanson Family Chiropractic in Batavia, Illinois and were recorded or placed at risk of being recorded by hidden cameras in private areas of the clinic (including treatment rooms and the red-light therapy room), without their knowledge or consent.

Excluded from the Class are Defendants; any entity in which Defendants have a controlling interest; Defendants' officers, directors, employees, legal representatives, heirs, and assigns; and any judge assigned to this case and their staff.

27. Numerosity. Upon information and belief, the number of impacted patients is at least approximately two hundred (200) and may be higher, making joinder impracticable. The precise number and identities of Class members can be ascertained from Defendants' records and/or forensic examination of recording devices, storage media, and accounts.

28. Commonality. Common questions of law and fact predominate, including:

- a. Whether the Hanson Defendants installed and used hidden cameras in private patient areas;
- b. Whether the Hanson Defendants recorded patients without consent;
- c. Whether such conduct constitutes intrusion upon seclusion and other torts;
- d. Whether the Hanson Defendants violated Illinois statutes and professional duties;
- e. Whether the Hanson Clinic is liable under respondeat superior and for negligent hiring/retention/supervision;

- f. Whether PMI owned/managed the premises and thereby owed invitees duties under the Illinois Premises Liability Act and common law to maintain reasonably safe conditions, conduct reasonable inspections, and warn of latent dangers;
- g. Whether covert recording devices and related alterations within vents, fan housings, ceilings, or fixtures were unreasonably dangerous conditions that were reasonably foreseeable, and whether PMI knew or should have known of them through reasonable inspections;
- h. Whether PMI breached its duties by failing to implement and enforce reasonable inspection, alteration-approval, access-control, and lease-enforcement policies, and whether those failures were a proximate cause of Class members' injuries; and
- i. The availability of injunctive relief, damages, restitution, punitive damages, and fee/cost shifting.

29. **Typicality.** Plaintiff's claims are typical of Class members' claims because all arise from the same course of conduct and are based on the same legal theories.

30. **Adequacy.** Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff's counsel are experienced in class actions, privacy, and sex-based torts. Plaintiff has no conflicts with the Class.

31. **Predominance and Superiority.** Common issues predominate over any individual issues. A class action is superior to individual actions to adjudicate the controversy efficiently and uniformly, especially where injunctive relief and preservation/destruction protocols are critical.

32. Injunctive/Declaratory Relief. Defendants have acted or refused to act on grounds generally applicable to the Class, making appropriate final injunctive and corresponding declaratory relief.

VI. CAUSES OF ACTION

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

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

34. The Hanson Defendants intentionally intruded, physically and otherwise, upon the private affairs and seclusion of Plaintiff and Class members by covertly recording them in private spaces where nudity and medical treatment occurred.

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

36. At all relevant times, Hanson and other personnel acted within the scope of employment and/or with apparent authority. The Hanson Clinic is vicariously liable for their torts.

37. As a direct and proximate result, Plaintiff and the Class suffered damages, including emotional distress, anguish, humiliation, loss of dignity, and related harms. Punitive damages are warranted for willful and wanton conduct.

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. Defendants' conduct—secretly recording patients, including minors, in private medical settings—was extreme and outrageous.

40. The Hanson Defendants intended to cause, or acted in reckless disregard of the probability of causing, severe emotional distress.

41. At all relevant times, Hanson and other personnel acted within the scope of employment and/or with apparent authority. The Hanson Clinic is vicariously liable for their torts.

42. Plaintiff and the Class suffered severe emotional distress and are entitled to compensatory and punitive damages.

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

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

44. The Hanson Defendants 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.

45. The Hanson Defendants breached these duties by installing hidden cameras, recording without consent, failing to supervise and train, and failing to implement or enforce privacy protections.

46. The Hanson Defendants' violations of Illinois criminal privacy/recording statutes constitute negligence per se, as such statutes are designed to protect persons like Plaintiff and the Class from the type of harm suffered.

47. At all relevant times, Hanson and other personnel acted within the scope of employment and/or with apparent authority. The Hanson Clinic is vicariously liable for their torts.

48. As a direct and proximate result, Plaintiff and the Class suffered damages.

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

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

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

51. The Hanson Defendants breached fiduciary duties by secretly recording patients, exploiting their vulnerability, and misusing clinical spaces for covert surveillance.

52. At all relevant times, Hanson and other personnel acted within the scope of employment and/or with apparent authority. The Hanson Clinic is vicariously liable for their torts.

53. Plaintiff and the Class suffered damages, and disgorgement of ill-gotten benefits and punitive damages are appropriate.

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

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

55. The Hanson Clinic had duties to hire, retain, and supervise personnel to ensure patient privacy and compliance with law.

56. The Hanson Clinic knew or should have known of the risk of privacy violations and failed to implement policies, training, monitoring, and physical inspections that would have prevented hidden cameras and covert recording.

57. As a result of the Hanson Clinic's negligence, Plaintiff and the Class were harmed.

COUNT VI
UNJUST ENRICHMENT
(Against the Hanson Defendants)

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

59. Defendants unjustly retained monetary benefits from patient payments made under the false premise of a lawful, privacy-respecting clinic.

60. Equity and good conscience require restitution and disgorgement.

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

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

62. The Hanson Defendants engaged in unfair and deceptive practices by representing that the clinic was a safe, ethical, and privacy-respecting medical environment while secretly recording patients, omitting material facts, and violating public policy.

63. Defendants' conduct was immoral, unethical, oppressive, and caused substantial injury to consumers that they could not reasonably avoid.

64. Plaintiff and the Class suffered actual damages and are entitled to all remedies under the Act, including attorneys' fees and injunctive relief.

COUNT VIII
NEGLIGENCE AND PREMISES LIABILITY
(Against PMI)

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

66. PMI, as owner and/or manager of the Premises, owed Plaintiffs and Class members—lawful invitees 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.

67. PMI retained control over structural elements and building systems within the Premises, including HVAC/ventilation housings, ceiling plenums, electrical raceways, and fixtures where concealed cameras and cabling were installed and operated.

68. Conditions existed on the Premises creating an unreasonable risk to patient privacy and safety, including concealed recording devices placed within vents, fan housings, and other fixtures and the modifications necessary to power and transmit from those devices.

69. PMI 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.

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

71. PMI's negligence was a direct and proximate cause of Plaintiff's and Class members' injuries, including severe emotional distress, invasion of privacy, humiliation, and other damages.

72. PMI's conduct was willful and wanton insofar as it showed an utter indifference to or conscious disregard for the safety and rights of others, warranting punitive damages.

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

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

74. 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 harms, including covert surveillance in private treatment areas.

75. It was reasonably foreseeable that covert recording devices could be concealed within vents, fan housings, ceiling plenums, and other fixtures if access and alterations were not reasonably controlled and inspected.

76. PMI breached its duties by failing to: (a) adopt and enforce reasonable inspection protocols for fixtures capable of concealing unlawful devices; (b) control keys and access; (c) oversee tenant build-outs and alterations; and (d) respond adequately to signs of tampering or unauthorized alterations.

77. PMI's breaches were a proximate cause of Plaintiff's injuries and damages.

78. On behalf of herself and all others similarly situated, Plaintiff seeks compensatory and punitive damages, and such other relief as permitted by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the Class, respectfully requests that the Court enter judgment in her favor individually and on behalf of the Class and against Defendants, and award the following relief: (i) certify the Class under 735 ILCS 5/2-801; (ii) appoint Plaintiff as Class Representative and Plaintiff's counsel as Class Counsel; (iii) award compensatory and statutory damages, and restitution and disgorgement, in an amount to be proven at trial; (iv) award punitive damages for willful and wanton misconduct; (v) award pre- and post-judgment interest; (vi) award attorneys' fees and costs; and (vii) any further relief the Court deems just and proper.

Dated: November 11, 2025

Respectfully submitted,

By: /s/ Timothy A. Scott

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