



FILED
IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO
CLERK OF COURTS
CUYAHOGA COUNTY

WILLIAM EASTON HORNER
2899 Blue Ridge Drive
Morristown, TN 37814

Plaintiff,

v.

ALLISON MARIE STARK
[REDACTED]
[REDACTED]

Defendant,

ST. VINCENTS CHARITY HOSPITAL
2351 E. 22nd Street
Cleveland, Ohio 44115

Defendant.

Case No.:

DAVID T MATIA
CV 22 971495

Complaint

Judge:

**UNAUTHORIZED RELEASE OF HIPAA
PROTECTED HEALTH INFORMATION
TO A HOSTLE 3RD PARTY**

Plaintiff, William E. Horner by Pro Se representation, files his Complaint of Unauthorized Release of HIPPA Protected Health Information (PPI) against Defendants Allison M. Stark and St. Vincent's Charity Hospital and states as follows:

THE PARTIES

1. Plaintiff William E. Horner ("Plaintiff") resides at 2899 Blue Ridge Drive, Morristown, Tennessee 37814, in Hamblen County.
2. Defendant Allison M. Stark ("Defendant") resides at [REDACTED] Ohio [REDACTED], in Cuyahoga County.

3. Defendant St. Vincent's Medical Group ("Defendant") is a nonprofit medical hospital with main campus address at 2351 E. 22nd Street, Cleveland Ohio 44115.

JURISDICTION & VENUE

4. Venue is proper in this forum because the unauthorized release of HIPPA protected information took place in this County. Both Plaintiff and Defendants were at all relevant times residents of this County.

THE FACTS

5. on August 20th, 2020, Defendants illegally probated Plaintiff in St. Vincent's Charity Hospital on a fabricated probate order that has since been expunged from the probate court so that "the case never existed" after being hauled out of his attorney's office without a warrant while Plaintiff was citing the 4th Amendment o the US Constitution and is Miranda rights. (Exhibit A)
6. Against Plaintiff's explicit instructions, Defendant, St. Vincent's, contacted Defendant Allison Stark to consult with her on Plaintiff's care. [REDACTED]
[REDACTED]
7. Defendant St. Vincent's Charity Hospital then refused to provide an accurate and complete copy of Plaintiff's medical records to the Plaintiff so he could follow the instructions to Judge Tonya R. Jones and obtain access to his children through formal custody arrangements. (Exhibit C.)
8. The direct result of the unauthorized HIPAA release along with St. Vincent's failure to release the records to Plaintiff has directly resulted in Plaintiff's complete loss of all access to his children along with substantial emotional, financial, and reputation damages.

COUNT I- UNAUTHORIZED RELEASE OF HIPPA PROTECTED PPI

9. Plaintiff incorporates as if fully rewritten herein all the allegations, statements, and averments contained above.
10. Plaintiff states the losses and trauma associated with Plaintiff's illegal incarceration in St. Vincent's charity hospital was a direct and proximate result of the Defendant, St. Vincent's Medical Group, releasing HIPAA protected information illegally to Defendant Stark in direct contradiction to Plaintiff's explicitly stated instructions.
11. Plaintiff states the losses and trauma suffered were a direct and proximate result of Defendant, St. Vincent's, refusing to provide a complete and accurate medical record per Plaintiff's request.

COUNT II- UNAUTHORIZED ACCESS OF HIPPA PROTECTED PPI

12. Plaintiff incorporates as if fully rewritten herein all the allegations, statements, and averments contained above.
13. Plaintiff states the losses and trauma were caused by the intentional and unauthorized access of his confidential doctor/patient communications by Defendant Stark. Her accessing the confidential information constitutes a direct and proximate access unauthorized HIPPA protected records.

[REDACTED]

[REDACTED]

Wherefore, the Plaintiff, prays for judgement against the Defendants in the amount:

1. **IN EXCESS OF \$10,000.00** in compensatory damages for the costs incurred in exposing Defendant's conspiracy.
2. **IN EXCESS OF \$1,000,000.00** in compensatory damages for the damages to Plaintiff's reputation incurred from the illegal incarceration in St. Vincent's.

3. **IN EXCESS OF \$5,000,000.00** in punitive damages for emotional pain and suffering including the complete alienation of Plaintiff from his two minor children for 800+ days.
4. and interest, costs, reasonable fees incurred in Plaintiff's pursuit of this action, and any other such legal and equitable relief as the Court deems just and proper.

JURY DEMAND

A trial by jury is respectfully requested in the above matter.

CERTIFICATE OF SERVICE

A soft copy of the foregoing **COMPLAINT** was served upon Allison M. Stark via email on

11/7/2022 at her last known email address [REDACTED].

A hard copy of the foregoing **COMPLAINT** was served upon Allison M. Stark via certified USPS

mail on 11/7/2022 at her home address of [REDACTED] Ohio
[REDACTED]

A hard copy of the foregoing **COMPLAINT** was served upon St. Vincent's Medical Group via

certified USPS mail on 11/7/2022 at their main campus address 2351 E 22nd St, Cleveland, OH
44115.

William E Horner (SEAL)

11/7/2022 (Date)

William Easton Horner

2899 Blue Ridge Drive Morristown, TN 37814

williamehorner@gmail.com

865.322.9331

Plaintiff, Pro Se

PLAINTIFF AFFIDAVIT

This complaint, and its contents, represent the truth, the whole truth, and nothing but the truth, to the best of my knowledge, and I swear to its validity under penalty of perjury through affixing my signature and seal.

William Easton Horner (SEAL)

11/7/2022 (Date)

William Easton Horner

2899 Blue Ridge Drive

Morristown, TN 37814

williamehorner@gmail.com

865.322.9331

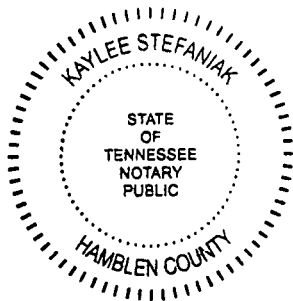
Plaintiff, Pro Se

State of Tennessee

County of Hamblen

William Easton Horner subscribed and sworn to (or affirmed) before me this 7 day of

November in the year 2022 of our Lord.



Kaylee Stefaniak (SEAL)

Signature of Notary Public

05-26-25 Commission Expires

INDEX OF EXHIBITS

- Exhibit A** Fabricated Probate Order that has been expunged from the Probate Court so that "The case never existed."
- Exhibit B** Copy of Civil Protection order where Defendants assert that HIPAA protected PPI was released from St. Vincent's to Allison Stark without proper release authorization.
- Exhibit C** Incomplete copy of medical records released to Plaintiff upon medical records request.
Notice there is no actual medical records in the release despite formal request.

PROBATE COURT OF CUYAHOGA COUNTY, OHIO

ANTHONY J. RUSSO, PRESIDING JUDGE

LAURA J. GALLAGHER, JUDGE

IN THE MATTER OF WILLIAM EASTON HORNER

CASE NO. 2020MI22049

ORDER OF DETENTION

(MENTAL ILLNESS)

[R.C. 5122.11]

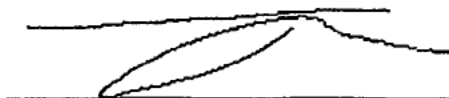
To: NORTH OLMSTED POLICE DEPARTMENT And/Or Any Other Police Officer

For: THE DIR. OF ST. VINCENT CHARITY PSYCHIATRIC EMERGENCY ROOM

Whereas **ALLISON HORNER**, who resides at [REDACTED] OH, [REDACTED], has filed in the Probate Court of Cuyahoga County an affidavit alleging that **WILLIAM EASTON HORNER**, residing at **RADISSON HOTEL 25070 COUNTRY CLUB BLVD., NORTH OLMSTED, OH, 44070**, is a mentally ill person subject to court order.

You are therefore commanded to apprehend said person forthwith and detain him at **ST. VINCENT CHARITY HOSPITAL, 2351 E. 22ND ST. , CLEVELAND, OH, 44115**, then and there to abide the order of this Court in the premises. Herein fail not, and of this writ make legal service and due return not later than the first business day after service is had.

**Witness my signature and the seal of the Court
this August 20th, 2020.**



MAGISTRATE



DEPUTY CLERK

Exhibit A

Please sign on back and return to
Probate Court.

PROBATE COURT OF CUYAHOGA COUNTY, OHIO

ANTHONY J. RUSSO, PRESIDING JUDGE

LAURA J. GALLAGHER, JUDGE

IN THE MATTER OF WILLIAM EASTON HORNER

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**Witness my signature and the seal of the Court
this August 20th, 2020.**



MAGISTRATE



DEPUTY CLERK

CONFIDENTIAL

**PROPERTY OF
CUYAHOGA COUNTY PROBATE COURT**

**This is not to be
duplicated or distributed.**

ISSUED 08/20/2020 10:52:14 BY: JAB

**Effective Date: February 10, 2017
CCPC FORM 27.2 - (PSORDETM)**

PROBATE COURT OF CUYAHOGA COUNTY, OHIO

Hospital copy

Military Service	NO
SSN	
Hosp Ins	
No.	

Name WILLIAM EASTON HORNER
 Address RADISSON HOTEL, 25070 COUNTRY CLUB BLVD.
NORTH OLMSTED, OH 44070
 Phone (919) 446 - 5985 County CUYAHOGA
 Height 6ft 3in Weight 225 Eyes HAZEL Hair BALD
 Age 33 Birthdate 09/13/1986 Sex MALE Race CAUCASIAN
 Marital Status MARRIED Education _____
 Income _____ Employer STEP 2
 Referred by _____ Phone _____
 Applicant ALLISON HORNER Phone _____
 Address _____
 Agency Contact _____ Phone _____
 Physician _____ Phone _____

RELATIVES	RELATIONSHIP	ADDRESS	PHONE
ALLISON HORNER	WIFE		

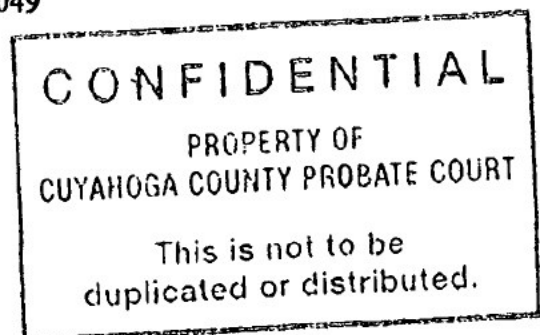
PROBLEM: RESPONDENT IS DELUSIONAL. HE BELIEVES THAT HE IS A SIMULATED PERSON AND THAT HIS REAL PERSON IS DEAD. HE HAS BEEN PUT ON LEAVE FROM WORK DUE TO HIS ERRATIC AND IRRATIONAL BEHAVIOR. HE IS POSTING INAPPROPRIATE MESSAGES ON FACEBOOK ADVOCATING VIOLENCE AGAINST THE POLICE. HE HAS MADE CREDIBLE SUICIDE THREATS WITH A FIREARM. HE HAS ACCESS TO FIREARMS AND HAS INDICATED A WILLINGNESS TO USE THEM. HE IS NOT MED COMPLIANT.

Date	Affidavit signed by	Date	Warrant issued to
08/20/2020	ALLISON HORNER	08/20/2020	NORTH OLMSTED POLICE

MAGISTRATE _____

[Signature] Deputy Clerk

Case No. 2020MI22049



CALL FOR SERVICE REPORT

2019224



Date: 08/20/2020 Time: 13:40:53 Mrc: 1 Dispatchers: DJMK LBMP

Location:
905 CANTERBURY RD E

City:
WESTLAKE

Zone:
NE

Grid: Agency
WL

Call Type:
PROBATE

Incident#:

Accident#:

EMS #:

Fire #

Reviewed By: Disposition:
ASSIST

Caller:

Common Name:

Caller:
ALLISON HORNER

Caller Address:

OH XXXX

Units / Times

Unit:	Dispatch : Route:	Arrive:	Cleared:	Patient:	Leave:	Hospital:	In Service:	Quarters:	Badge1	Badge2:	Agency
34JC	14:27:46	14:33:12	15:18:18						034		WL
37JH	14:27:45	14:33:14	15:18:20						037		WL
S7GU	14:30:47		14:38:00						SGDU		WL

Narrative

Caller on station w/ a copy of Probate Order for her soon to be ex-husband, William Horner/09-13-1986 who is staying at the Radisson Hotel (in NO). Husband is bi-polar and not taking his medication. He has been posting inappropriate comments on social media advocating violence against police. Husband DOES have access to firearms and has made credible threats of suicide w/ them. Husband will be at his attorney's office around 1500hrs today for an appointment. Wanted WPD to be aware. Husband drives a white Hyundai Veloster, HKF8184. Probate order scanned to this entry. Subject to be transported to St Vincent's if located. #34JC/37JH to sit in area.

1434hrs 34/37 out w/ subject in the parking lot.

1438hrs subject is being cooperative. Will be advising his attorney.

1442hrs subject in custody. 37 to transport, 34 to follow. 1449hrs Allison Homer advised by lbmp.

1517hrs 37/34 10/8, subject TOT hospital staff.

This proceeding came on for a hearing on 09/01/2022 before the Court and the
 Ex Parte Order issued on 08/18/2022. The following individuals were present:
 Petitioner **ALLISON STARK**, with Counsel.

The Court hereby makes the following findings of fact:

The Court finds that Respondent was properly served. The Court further finds that Petitioner was sworn and gave testimony that supports findings that Respondent committed domestic violence as defined by R.C. 3113.31 and that Petitioner, the parties' children and Petitioner's other household members are in danger of domestic violence. Petitioner's testimony is found to be credible.

The Court finds that the protected persons herein are in immediate and present danger of domestic violence and for good cause shown, the following temporary orders are necessary to protect the persons named in this Order from domestic violence.

The Court also finds: The parties were married and share two minor children. A decree of Divorce was issued in November 2021. Respondent was not awarded parental rights and no visitation orders were issued. See DR Case 20 382383. Petitioner testified that during the divorce proceedings Respondent was visibly angry with her, her attorney, his own attorney, and the Court. At some point, Respondent refused to participate and stopped coming to the hearings. Respondent claimed civil disobedience as a basis for his absence from the proceedings.

Respondent has mental health issues. In August 2020, Petitioner had Respondent probated because of suicidal thoughts. Petitioner believed that Respondent was a threat to himself and others because Respondent had access to weapons. Westlake Police detained Respondent for a psychiatric evaluation. Respondent spent 5 days in St. Vincent Psychiatric unit. Initially, the hospital contacted Petitioner to consult with her on the Respondent's care. At some point, Respondent revoked his consent for the hospital to communicate with Petitioner. Respondent's parents were able to assist Respondent with his release from evaluation and treatment. Petitioner is aware that Respondent has an untreated mental health diagnosis of Bi-polar.

Respondent has substance abuse issues. Respondent has an active warrant for possession of drugs. When Respondent moved out of Petitioner's home, he left a baggie with psychedelic mushrooms in the basement next to the children's play area. Respondent habitually uses marijuana and abuses alcohol.

Respondent has engaged in menacing conduct. From April 2022 to the present Respondent has sent emails, postcards, and digital correspondence via social media platforms to Petitioner, Petitioner's mother, Petitioner's family, friends, and neighbors. Respondent sends links to documents on YOUTUBE, LinkedIn and GoFundMe. Respondent has also sent similar correspondence to this Honorable Court via email. Each correspondence has hyperlinks that are attached to Respondent's website where he alleges that Petitioner and her mother have conspired with the FBI to kidnap the minor children. Respondent also threatens to take the children from the Petitioner and change their identity so that Petitioner never sees the children again. Petitioner is concerned the Respondent will take the children out the country. Respondent has published and disseminated materials about Petitioner and her mother on a website created by Respondent for the purpose of raising money to assist him with his plot to gain possession of his children. Respondent has disseminated posting on his website that state that an agent named Brandon Brown would come to Cleveland and execute Petitioner, Petitioner's mother, and their children. See Petitioner's Exhibit A and B. Petitioner is concerned for her safety and the safety of her children because of Respondent's misrepresentations and violent threats related to her and her household members.

Respondent's cyber conduct and electronic dissemination has caused Petitioner significant mental distress. Petitioner does not sleep well. Petitioner is afraid to leave her home. Petitioner is terrified that Respondent will locate the children at school and remove them. Petitioner's performance at work has been negatively impacted by Respondent's conduct. Petitioner believes that Respondent continues to have access to weapons. Respondent has told Petitioner that he could arrive at Petitioner's home "armed to the 'T'" and take the children and Petitioner would never see them again. Petitioner believes that Respondent's conduct is escalating and will get worse. Petitioner requested a five-year order.

Exhibit B

If opposing counsel believes an attorney Pro Se having to 1) litigate this case and his other cases across state lines, 2) without assistance, 3) in a courthouse with a documented string of corruption and interference in proceedings, 4) while having to defend himself from illegal rouge operations conducted by the FBI while 5) having to defend himself from assassination attempts doesn't justify a 30-day extension to answer or otherwise plead, then certainly GoFundMe, LinkedIn, and YouTube with their armies of professional attorneys who are not having to defend themselves from assassination attempts can get their answer in on time within the 28-days of the summons without a 30-day extension. What's good for the goose is good for the gander your Honor.

Wherefore, Defendant respectfully objects to the granting of a 30-day extension to the nominal defendants while his own extension request under such heinous circumstances has been left unanswered.

Respectfully Submitted,

William E. Horner

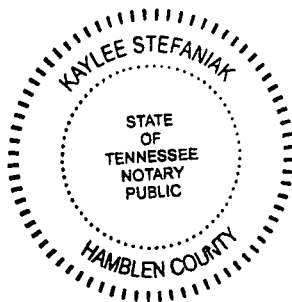
Date: 11/7/2022

William E. Horner
2899 Blue Ridge Drive
Morristown, TN 37814
(865) 322-9331
williamehorner@gmail.com
Defendant

State of Tennessee

County of Hamblen

William Easton Horner subscribed and sworn to (or affirmed) before me this 7 day of November in the year 2022 of our Lord.



Kaylee Stefaniak (SEAL)

Signature of Notary Public

05-26-25 Commission Expires

DEFENDANT AFFIDAVIT

This motion, and its contents, represent the truth, the whole truth, and nothing but the truth, to the best of my knowledge, and I swear to its validity under penalty of perjury through affixing my signature and seal.

William Easton Horner (SEAL)

11/7/2022 (Date)

William Easton Horner

2899 Blue Ridge Drive

Morristown, TN 37814

williamehorner@gmail.com

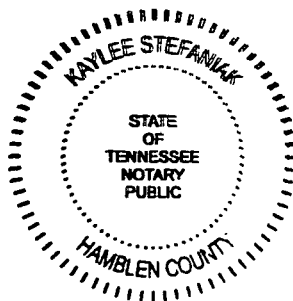
865.322.9331

Defendant, Pro Se

State of Tennessee

County of Hamblen

William Easton Horner subscribed and sworn to (or affirmed) before me this 7 day of November in the year 2022 of our Lord.



Kaylee Stefaniak (SEAL)
Signature of Notary Public

OS-26-25 Commission Expires

CERTIFICATE OF SERVICE

A soft copy of the foregoing **DEFENDANT'S OBJECTION TO 30 DAY EXTENSION FOR NOMINAL DEFENDANTS** was served upon Daniel F. Gourash via email on 11/7/2022 at his indicated email address dfgourash@sseg-law.com.

A soft copy of the foregoing **DEFENDANT'S OBJECTION TO 30 DAY EXTENSION FOR NOMINAL DEFENDANTS** was served upon Amelia J. Leonard via email on 11/7/2022 at her indicated email address aleonard@sseg-law.com.

William E. Horner (SEAL)

11/7/2022 (Date)

William Easton Horner

2899 Blue Ridge Drive Morristown, TN 37814

williamehorner@gmail.com

865.322.9331

Defendant, Pro Se



Common Pleas Court of Cuyahoga County, Ohio

DESIGNATION FORM TO BE USED TO INDICATE THE CLASSIFICATION OF THE CAUSE

William E. Horner

Plaintiff

2022 NOV 17 P 3:12

Judge: DAVID T MATIA

CV 22 971495

Vs.

Allison M. Stark

CLERK OF COURTS
CUYAHOGA COUNTY

Defendant

Has this case been previously filed and dismissed? Yes ☐ No ☒

Case #: _____ Judge: _____

Is this case related to any new cases now pending or previously filed? Yes ☐ No ☒

Case #: _____ Judge: _____

CIVIL CLASSIFICATIONS: Place an (X) In ONE Classification Only.

Professional Torts:

- ☒ 1311 Medical Malpractice
- ☐ 1315 Dental Malpractice
- ☐ 1316 Optometric Malpractice
- ☐ 1317 Chiropractic Malpractice
- ☐ 1312 Legal Malpractice
- ☐ 1313 Other Malpractice

Product Liability:

- ☐ 1330 Product Liability

Other Torts:

- ☐ 1310 Motor Vehicle Accident
- ☐ 1314 Consumer Action
- ☐ 1350 Misc. Tort

Workers Compensation:

- ☐ 1550 Workers Compensation
- ☐ 1531 Workers Comp. Asbestos

Foreclosures:

- ☐ Utilize Separate Foreclosure Designation Form

Commercial Docket:

- ☐ 1386 Commercial Docket
- ☐ 1387 Commercial Docket with Foreclosure

Administrative Appeals:

- ☐ 1540 Employment Services
- ☐ 1551 Other

Other Civil:

- ☐ 1500 Replevin/Attachment
- ☐ 1382 Business Contract
- ☐ 1384 Real Estate Contract
- ☐ 1388 Consumer Debt
- ☐ 1390 Cognovit
- ☐ 1391 Other Contracts
- ☐ 1490 Foreign Judgment
- ☐ 1491 Stalking Civil Protection Order
- ☐ 1501 Misc. Other
- ☐ 1502 Petition to Contest Adam Walsh Act
- ☐ 1503 Certificate of Qualification for Employment

Amount of Controversy:

- ☐ None Stated
- ☐ Less than \$25,000
- ☒ Prayer Amount 6,010,000.00

Parties have previously attempted one of the following prior to filing:

- ☐ Arbitration
- ☐ Early Neutral Evaluation
- ☐ Mediation
- ☒ None

I certify that to the best of my knowledge the within case is not related to any now pending or previously filed, except as noted above.

Firm Name (Print or type) William E. Horner

Address 2899 Blue Ridge Dr.

Address Morristown, TN 37814

Phone 865. 322-9331

Attorney of Record (Print or Type) Self

Supreme Court # _____

Email Address williamehorner@gmail.com

Signature William E. Horner