

1
2 IN THE CIRCUIT COURT OF THE STATE OF OREGON
3 FOR THE COUNTY OF MULTNOMAH
4

5
6 ERIKA KATRIN MEYER,
7 Plaintiff,

Case No. 22CV44081

8 vs.

PLAINTIFF'S MOTION FOR LEAVE TO
FILE AMENDED COMPLAINT

9 WILLAMETTE DENTAL
10 DR. JENNIFER NGUYEN
11 DR. KOICHI SAITO
12 ADVANTAGE DENTAL
13 DR. JOSEPH JAMUS
14 DR. ADAM POLAN
15 ROOTS DENTAL
16 DR. IAN DICKINSON
17 HEAD & NECK SURGICAL ASSOCIATES,
18 DR. ASHISH PATEL
19 Defendants

(BATTERY, DECEIT, NEGLIGENCE PER
SE, CIVIL CONSPIRACY) CLAIMS NOT
SUBJECT TO MANDATORY
ARBITRATION (JURY TRIAL
DEMANDED ON ALL CLAIMS SO
TRIALABLE) PRAYER AMOUNT:
\$10,000,000.00 PLUS INJUNCTIVE RELIEF

20 Oral argument not requested

21 Pursuant to ORCP 23 A, Plaintiff Erika Katrin Meyer moves the court for leave to file the
22 attached amended complaint. ORCP 23 permits amending pleadings by leave of court "when
23 justice so requires." The plaintiff believes the attached amended complaint better conforms to the
24 evidence, pleads the relevant issues, and remedies deficiencies in her original complaint.

25 Dated this 21st day of June, 2023

26
27 /s/ Erika Katrin Meyer
28 Erika Katrin Meyer, Plaintiff

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INJUNCTIVE RELIEF - 1

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INJUNCTIVE RELIEF - 2

1 **PARTIES, JURISDICTION, AND VENUE**

2 1.

3 Plaintiff Erika K Meyer is a resident of Multnomah County, Oregon.

4 2.

5 Defendants Dr. Jennifer Nguyen, Dr. Joseph Jamus, Dr. Adam Polan, Dr. Ian
6 Dickinson, and Dr. Ashish Patel all practice dentistry and medicine in Multnomah County,
7 Oregon. Willamette Dental, Advantage Dental, Roots Dental, and Head & Neck Surgical
8 Associates all do business in Multnomah County. All medical treatments referenced in this
9 complaint occurred in Multnomah County.
10

11 3.

12 Multnomah County, Oregon is the proper venue and jurisdiction.
13

14 **INTRODUCTION**

15 4.

16 This is a complaint alleging continuing torts of battery, deceit, negligence per se, and
17 civil conspiracy among six different dentists and/or their employers. The employers are included
18 under the doctrine of respondeat superior - *Chesterman v. Barmon*, 305 Or 439, (1988) - and
19 because there is evidence of systematic malfeasance and conspiratorial behavior within the
20 company itself.
21

22 5.

23 Central to this complaint is the implanting and cover-up of wirelessly accessible
24 piezoelectrical biomedical devices used to manipulate, torture, maim, and murder. *Every single*
25 *day* the plaintiff is being harmed by these devices.
26

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INJUNCTIVE RELIEF - 3

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6.

The plaintiff recognizes that this is an unusual case for a number of reasons, though she does not believe she is the only victim. There are consistent patterns of misdirection, obstruction, and other forms of concealment suggesting organization, planning, and intent.

7.

These are deliberate harms from which, through cover-ups and Catch-22s, the plaintiff has been unable to access redress through the criminal justice system, nor through any number of other systems or laws which are supposed to protect victims of violent crime. Although the plaintiff is aware, and can show ample evidence, that she is an endangered crime victim, police and FBI have both consistently refused to open an investigation into her complaints. Without an open investigation, the plaintiff is unable to access protection from the crime under state or federal crime victims' rights laws.¹

8.

This complaint is but a snapshot of one corner of a vast and malicious conspiracy. Part of the difficulty of bringing a complaint of this type is figuring out where the conspiracy begins and ends, and how to address all the parts accurately and effectively, as coordinated concealment efforts are ongoing.

¹ According to the Oregon Constitution § 42 6(c) "'Victim' means any person determined by the prosecuting attorney or the court to have suffered direct financial, psychological or physical harm as a result of a crime and, in the case of a victim who is a minor, the legal guardian of the minor." This plaintiff's experience and advice from crime victims advocate groups has been consistent and clear: without prosecution by the state or federal justice system, there is no protection for a victim, regardless of the danger or severity of the crime.

1 9.

2 Despite the unusual nature of the complaint, these allegations really hinge on a
3 few simple points of fact, and some basic science and reasoning. The facts are as follows:
4

5 10.

6 Sometime in June 2014 the plaintiff's left molar, tooth #14 became extremely sensitive.
7 The following August the tooth was found to need a crown or extraction. The plaintiff chose a
8 crown. The plaintiff's parents paid for the root canal and crown.
9

10 11.

11 Willamette Dental then manufactured and installed a porcelain-fused-to-metal (PFM)
12 crown. Even though the plaintiff was paying out of pocket, no other types of crowns were
13 offered.
14

15 12.

16 Beginning in April or May of 2016 the equivalent molar on the opposite side of the
17 plaintiff's mouth, tooth #3, became similarly sensitive. A Willamette Dental dentist told the
18 plaintiff that it, too, was cracked and should probably have a root canal or extraction. This time
19 the plaintiff opted to wait and see. The tooth then improved and is as of this writing, intact.
20

21 13.

22 Beginning in spring of 2017 via a series of palpable activations, the plaintiff became
23 cognizant of biomedical devices implanted in tissues throughout her body. In October 2017 she
24 purchased a wide range frequency tracer (aka "bug detector") with a unidirectional antenna, and
25 using this device, she confirmed her suspicions: she found and documented consistent evidence
26 of wireless signals throughout her body, including from some of her dental work, specifically
27

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INJUNCTIVE RELIEF - 5

1 white composite resin fillings in her upper left molars from 1986, and the crown on tooth #14. A
2 dental crown from about 1993, tooth #7, also shows signs of being reactive to wireless weapons.

3
4 14.

5 Beginning in January 2019 tooth #14 became increasingly uncomfortable. In July 2019
6 the plaintiff asked Willamette Dental for the crown on tooth #14 to be removed and replaced.
7 This request was refused, but it was not made clear why the request was refused. As this is a
8 large tooth, the plaintiff was hoping to avoid an extraction.

9
10 15.

11 By November 2019 it was clear to the plaintiff that the crown was being used as a target
12 for wireless weapons, and that these weapons were also being used to cause pain and damage to
13 tissues surrounding the tooth (head, neck, brain).

14
15 16.

16 At a visit with Dr. Jennifer Nguyen on November 21, 2019 the plaintiff asked again for
17 the crown to be replaced, and again was told that it could not be replaced, and either the tooth
18 would need to keep the same crown or be extracted. Again it was not clear to the plaintiff why
19 the crown could not be replaced as she was being told two conflicting things at once: first, that
20 the crown and tooth were in good condition, and second, that she was experiencing pain because
21 the tooth was cracked. Based on the type of pain she was experiencing the plaintiff knew that it
22 from directed energy weapons.

23
24 17.

25 The plaintiff asked for a second opinion from an emergency dentist at Willamette Dental.
26 Manager Stephanie Holguin told the plaintiff that she would receive an answer that afternoon

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INJUNCTIVE RELIEF - 6

1 from a board of “highly, highly qualified dentists.” Later she was told that she would need to
2 wait up to a month for a response.

3
4 18.

5 On December 3, 2019 the plaintiff emailed Willamette Dental requesting that they
6 expedite the review process so that she could get a response, explaining “I very much consider
7 this to be an EMERGENCY. I am being attacked around the head and neck with frequency-
8 based weapons.” On December 7th, the Plaintiff received a letter in the mail refusing the request.

9
10 19.

11 On December 26, 2019 the plaintiff received finally received her official response in the
12 mail. In the letter, which was dated December 20, Willamette Dental wrote that tooth #14 needed
13 to be extracted because the crack had extended into the osseous level. The plaintiff moved
14 immediately to extract. Willamette Dental referred the Plaintiff to Dr. Ashish Patel at Head &
15 Neck Surgical Associates. The appointment was on January 10, 2020.

16
17 20.

18 At the extraction appointment Dr. Patel said that he found and removed a “large
19 periapical granuloma” (infection) at the root of tooth #14. In his notes, he described tooth #14 as
20 “carios.” The plaintiff requested that she keep the extracted crown. Dr. Patel told her that he
21 could not permit removal of biological material from his office. However, because the crown had
22 been associated with wireless attacks, the plaintiff viewed it as evidence of crime. So after the
23 extraction, when Dr. Patel stepped out of the exam room, the plaintiff took the extracted tooth.
24 On examination later, the plaintiff noticed that there was a hole in the bite surface of the tooth,
25 but was unaware that this was not a normal feature of a dental crown.

26
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INJUNCTIVE RELIEF - 7

1 21.

2 Dr. Patel had sutured the extraction site of tooth #14 with dissolving stitches. Within a
3 few days, as the suture material loosened, the Plaintiff noticed that the stitches were tangled and
4 looped around each other in a netted cat's cradle-like formation. Didn't Dr. Patel, an oral
5 surgeon, know how to sew sutures?
6

7 22.

8 As the swelling around the extraction site began to reduce, the plaintiff noticed a hard
9 lump on the outside of her gum, adjacent to the extracted tooth. This lump was still present at the
10 plaintiff's follow up visit with Dr. Patel on March 3, 2020. Dr. Patel said that it was likely a bone
11 chip or spur left over from the extraction, and that it would likely "flatten out" or "dissolve." He
12 describes it in his records as a "buccal bone spur" and writes that it would likely "exfoliate."
13

14 23.

15 Over the next few weeks, the lump did in fact disappear, though there was no sign of
16 exfoliation. At this time, the problems with tooth #14 appeared to have been resolved.
17

18 24.

19 During 2020 the plaintiff experienced a pattern of directed energy attacks to her
20 heart, another area from which plaintiff had detected high-frequency signals back in 2017, using
21 the FC 6002 MKII bug detector. Symptoms of these attacks included a sudden speeding up of the
22 heart rate, at times very rapidly; sensations of vibration; sensations of heating or burning; and
23 sensations of poking. Because of this, plaintiff spent several sleepless nights and made several
24 trips to emergency rooms, calling 911 at least three times. In each case, these incidents were
25 treated by emergency room doctors as histrionic delusional behavior or nuisance calls.
26

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INJUNCTIVE RELIEF - 8

1 25.

2 The plaintiff attempted to report the directed energy / biomedical attacks to her
3 heart first to the FBI via phone on July 30, 2020, telling them again that her life is in danger from
4 the use of these biomedical devices. FBI responded that plaintiff should call police, hospital, or
5 first responders and did not offer any alternatives when plaintiff explained that she had already
6 done this, and that police and hospitals both insisted they were technologically unequipped to
7 address this issue. The FBI also had no response when the plaintiff told them the hospitals were
8 involved in the crime.
9

10 26.

11 On December 17, 2020, plaintiff was informed that her husband's mother, Louise
12 Newman, had suffered a massive stroke leaving her in a comatose state. On December 20, 2020
13 Lousie Newman died.
14

15 27.

16 Sometime around this same time, plaintiff began to notice that she and her
17 husband, Chris Newman, were suffering from some of the same symptoms simultaneously, and
18 that often physical symptoms would begin at the same time each day. Some of this is
19 documented in her journals.
20

21 28.

22 Beginning on the evening of January 1, 2021, Chris Newman began to experience
23 abdominal discomfort, which continued to worsen on subsequent nights. On or around January 8,
24 2021 he was diagnosed with terminal gall bladder cancer and told that doctors would be unable
25

26
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INJUNCTIVE RELIEF - 9

1 to save his life. He also had a gall bladder infection. He was told that with palliative treatment
2 only, he would likely live another six months to one year.

3 29.

4 Chris Newman died four months later at exactly 11:33pm on Mother's Day, May 9, 2021.

5 30.

6 Beginning in July 2021, the plaintiff began to experience significant discomfort in
7 the two teeth adjacent to the extraction cavity, tooth #13 and #15. As this became more and
8 more distressing, she made an appointment with Emergency Dental on August 1, 2021. Dr.
9 Begino examined the area and took three x-rays. He was unable to find the source of the
10 problem. He suggested the was not in her teeth but soft tissues. He also noted that several of the
11 plaintiff's teeth were beginning to fracture, and suggested she was grinding her teeth at night.
12 The plaintiff does not grind her teeth. Although no measures were taken, the pain in tooth #13
13 and tooth #15 quickly dissipated after the visit to Emergency Dental.

14 31.

15 Because of the problems with Willamette Dental, plaintiff had taken steps to
16 switch dental providers.

17 32.

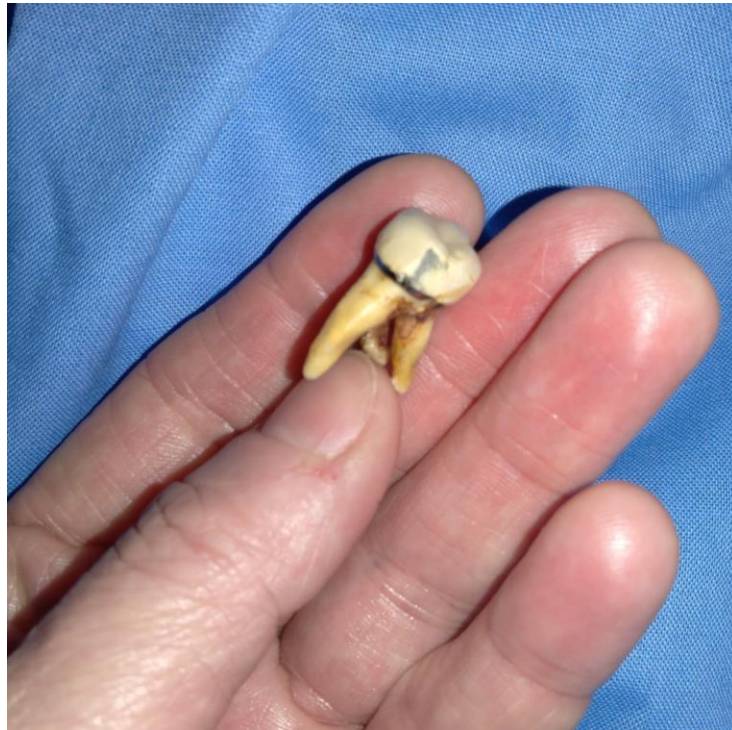
18 Beginning in January 2022, plaintiff began to notice a swelling and increasing
19 pain just inside of tooth #15. Because of its proximity to the extracted tooth #14, the plaintiff
20 suspected this problem was related to the January 2020 extraction. It felt very much like (and
21 still feels like) there is an object embedded in the tissue behind the tooth.

33.

On or around January 31, 2022, plaintiff called Head and Neck Surgical Associates to report the new development and ask for a follow up visit. Head and Neck Surgical Associates responded that they would only consult with the plaintiff on referral from a dentist.

34.

The plaintiff photographed the extracted crown on February 2, 2022.



35.

On February 3, 2022 the Plaintiff noticed that newly painted City of Portland recycling and trash bins featured a blue and black butterfly flying through beam-like shapes with what appears to be stylized teeth decorating its wings. The butterfly appears to carry a diamond on its back.

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Later the plaintiff realized that “street art” stickers focused on diseased-looking teeth, or with various types of dental references, had been put up in Portland over the years. They were especially common in 2014, when the crown was first installed. The plaintiff has also noticed a hidden-in-plain sight coded language in which covert biomedical implants are referred to as “diamonds.”² This suggests that this conspiracy is actually quite widespread and that these devices are connected to finance.

² Other coded “slang” that seems to reference these biomedical implants includes pizza, doughnuts, chips, crystal, switchblades, patches, wires, networks, pins. Visually they are often represented by things like chain link fencing or flat geometric shapes like those seen in piezoelectrical biomedical implants (<https://www.pi-usa.us/en/tech-blog/miniature-piezo-transducers-for-medical-devices-medical-engineering>) often with concentric rings at the edges, PLAINTIFF’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT, NEGLIGENCE PER SE, CIVIL CONSPIRACY) CLAIMS NOT SUBJECT TO MANDATORY ARBITRATION (JURY TRIAL DEMANDED ON ALL CLAIMS SO TRIABLE) PRAYER AMOUNT: \$10,000,000.00 PLUS INJUNCTIVE RELIEF - 12

1 36.

2 The plaintiff was now insured through Advantage Dental and so followed up with
3 them, asking for an appointment as soon as possible in order to receive the referral. An
4 appointment was made for February 15, 2022 at the Advantage Dental Gateway Clinic.
5

6 37.

7 Prior to the February 15 appointment, the plaintiff emailed her dental records to
8 Advantage Dental, including the August 1, 2021 radiographs made by Emergency Dental,
9 writing "This is the area of my mouth where I continue to have problems, daily. I have identified
10 what I believe to be the source of these problems as a small lump just behind tooth #15, to the
11 rear of the extraction cavity (tooth 14)."
12

13 38.

14 The plaintiff visited Advantage Dental Gateway on February 15, 2022. A full set
15 of dental x-rays was taken. Dr. Jamus conducted the exam. Though hidden from plaintiff's view,
16 the painful bump behind tooth #15 was prominent enough that plaintiff could feel it with her
17 fingertips as well as with her tongue. Dr. Jamus, however, claimed that he could neither see nor
18 feel anything unusual in the area. He pulled up the new x-ray radiograph of the area and said that
19 nothing of note was visible in the radiograph.
20
21
22
23

24
25 possibly representing electrodes. Based on how this coded language is and has been used in media such as movies
26 and television, it is clear that this covert piezoelectrical biomedical technology has been in use at least since the
27 1930s, and implants secreted into dental work, probably longer. The associated technologies – radio frequency and
28 piezoelectrical technologies – are known to have been in commercial use since the late 19th century.
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INJUNCTIVE RELIEF - 13

39.

The plaintiff, who had by now been in pain for several weeks, and who could not believe that Dr. Jamus could not see or feel the painful lump behind her tooth, implored Dr. Jamus to help her find a solution to this problem. Dr. Jamus suggested that plaintiff could go back to Head and Neck Surgical Associates. When the plaintiff explained that she needed a referral to do so, Dr. Jamus refused to give the referral.

40.

In the chart notes for this visit, Dr. Jamus falsely reported the plaintiff as being "physically and verbally abusive to Dr. Jamus and Justine." These notes state that the plaintiff had been dismissed from practice, though plaintiff herself was never told this. Instead, the practice simply stopped answering or returning plaintiff's phone calls, forcing the plaintiff to physically travel to the office every time she needed to communicate.

41.

On March 6, 2022 a strange blood-filled blister appeared suddenly, and from no obvious cause, on the inside of the plaintiff's right cheek, and popped 15 minutes later. The plaintiff photographed the blister. This phenomenon - a sudden appearance of large blisters inside plaintiff's mouth happened on two other occasions in March or April 2022. The plaintiff has not experienced this phenomenon before or since.

42.

The plaintiff continued to have problems with the area behind tooth #15, and continued to seek help from oral surgeons. This effort often necessitated travelling to offices as her phone calls to Advantage Dental Gateway were often neither answered nor returned, and

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1 phone calls to Head & Neck Associates either were not answered, or were dropped mid-call. The
2 plaintiff was also having difficulty accessing the records from her February 15 visit at Advantage
3 Dental.

4
5 43.

6 The issue of being dropped mid-call seems to be indicative of some malfeasance
7 around phone operations. It has happened with phone calls to police, a medical-linked phone call
8 to the FBI, calls to medical providers, and calls to Head & Neck Associates.

9
10 44.

11 On March 10, 2022 the plaintiff attempted to photograph the inside of her own
12 mouth using an android phone pointed into the general area where she knew there was pain and
13 swelling. The plaintiff could clearly see a swollen area in the photo. The plaintiff then ordered a
14 lit dental mirror from Amazon.com. When the mirror arrived a couple of days later, the plaintiff
15 was able to see the area and determine that there was visible inflammation, swelling, as well as
16 an oval shaped outline about 1/2-centimeter-long, 1/4-centimeter-wide, and located about 1/4
17 centimeter inside of tooth #15.

18
19 45.

20 On March 15 the plaintiff purchased an inter-oral dental reflector mirror from
21 Amazon that would allow her to view and photograph the area behind her teeth.

22
23 46.

24 On or around March 16, 2022 the plaintiff received records from the February 15,
25 2022 Advantage Dental Gateway visit, including the full set of x-rays in an assembled collage.

26
27 47.

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INJUNCTIVE RELIEF - 15

1 Still seeking a referral to an oral surgeon to address the embedded object behind
2 tooth #15, the plaintiff decided to visit another dentist. On March 18, 2022 she first travelled to
3 Head & Neck Surgical Associates to discuss the issues at hand, and later the same day, visited a
4 new dentist called Roots Dental with the intention of further documenting the issue, and getting a
5 referral.
6

7 48.

8 Roots Dental did an exam and offered to do x-rays. The plaintiff declined a new
9 set of x-rays but asked if there was a way to take photographs of the problem area of her mouth.
10 Roots Dental had an inter-oral camera and was able to take some photos of the area. The dentist,
11 Dr. Ian Dickinson, also gave a referral, but told the plaintiff that the only oral surgeon within
12 Portland to whom they could refer was Head and Neck Surgical Associates. The plaintiff
13 accepted the referral.
14

15 49.

16 Chart notes associated with this March 18, 2022 visit to Roots Dental contain
17 significant inaccuracies, including the false statement that "sometimes the whole left side of her
18 face goes numb" and the statement that "she feels it is an emergency to have this tooth
19 removed." Some of the inaccurate information was later transferred to chart notes for Head &
20 Neck Associates.
21

22 50.

23 On March 22, 2022 plaintiff again travelled to Head and Neck Surgical
24 Associates where she was told she could have a consult with Dr. Patel on March 31. After having
25 been told initially that she could see a different provider at the same facility for a second opinion,
26

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INJUNCTIVE RELIEF - 16

1 the office manager now explained that due to the administrative structure of the clinic, all the
2 surgeons would agree with Dr. Patel.

3
4 51.

5 The plaintiff continued to experience severe discomfort associated with area
6 behind tooth #15 and in surrounding tissues. By now she suspected that problems in this area of
7 her mouth were the result of malfeasance on the part of Dr. Patel during the January 10, 2020
8 oral surgery, and therefore she did not have any reason to believe that Dr. Patel would ultimately
9 be helpful in resolving the problem. For this reason, the plaintiff continued to pursue other routes
10 towards a consultation with a new oral surgeon.

11
12 52.

13 On March 25, 2022 plaintiff sought help from her medical clinic, Providence
14 Cascade. Because her regular doctor, Dr. Thomas Warrington, was not available, she saw a nurse
15 practitioner named Heather Lowell. After viewing the inflammation behind tooth #15, Ms.
16 Lowell indicated she would refer plaintiff to Sunset Oral Maxillofacial Surgery. The plaintiff
17 attempted to make an appointment with Sunset Oral Maxillofacial Surgery immediately
18 following the visit, but was told their earliest available consultation appointments were in late
19 April. A receptionist at the clinic suggested that, based on the plaintiff's reporting of her
20 condition as painful and urgent, that the plaintiff could seek help from an emergency room; and
21 that emergency room surgeons should be equipped to remove an object embedded in the surface
22 of the mouth tissue.
23
24
25
26

27 PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT,
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INJUNCTIVE RELIEF - 17

1 53.

2 On March 26, 2022 plaintiff went to Providence Portland Emergency Room with
3 the hopes that they would excise the embedded object. The plaintiff was seen by Dr. Dugoni who
4 immediately upon entering the exam room, informed plaintiff that she had a very serious disease
5 called "delusional disorder." The plaintiff replied "You have not even looked at my mouth yet"
6 and also called the doctor's attention to the Roots Dental photographs she had emailed to her
7 provider on March 25.
8

9 54.

10 Dr. Dugoni said that delusional disorder as a "very common" psychiatric
11 condition that he encounters frequently. This is a direct contradiction with the diagnostic
12 standards manual (DSM-V) which says it is a very rare condition. After viewing the photos and
13 looking into plaintiff's mouth, Dr. Dugoni said that he would refer plaintiff to an oral
14 maxillofacial surgery provider. When plaintiff inquired as to whether the embedded object could
15 be removed in the emergency room or hospital setting, Dr. Dugoni said that only a qualified oral
16 surgeon could do this work, and that it might "bleed a lot." The plaintiff was also advised to
17 follow up with her regular provider, Dr. Warrington.
18

19 55.

20 Sunset Oral Surgery at first offered an appointment with Dr. Sharifi, but within a
21 few days called plaintiff and said they could not see her because based on her chart notes they
22 had determined that her problem was not oral but "neurological."
23
24
25
26

56.

The plaintiff's next visit was to Head and Neck surgical associates. Head and Neck Associates refused to bill the plaintiff's insurance since her referral did not come from Advantage Dental, and they would not accept a referral from the plaintiff's regular doctor, because they had determined the problem was not medical but dental. The plaintiff's parents paid for the visit.

57.

Dr Patel diagnosed the lump behind tooth #15 as a "bone spur." Incorrect information from previous chart notes was transferred over, including false information about drug use, psychiatric conditions, and the false statement about the whole left side of plaintiff's face going numb. The plaintiff's concerns about wirelessly accessed biomedical implants were misinterpreted as being concerns about a "tracking" device.

58.

The plaintiff had now reached a stalemate with all available medical and dental providers. Because the plaintiff was by now well aware that the embedded object was likely a biomedical implant which was being used as a target for wireless weapons, and because the embedded object seemed to be near the surface of the skin, the plaintiff decided to take the unusual step of attempting to excise the object herself. At this time, based on the physical properties of the area, the plaintiff believed that the object was a flake or chip-like oval shape, about the size of the outline she'd been seeing so consistently (.5 cm by .25 cm). The plaintiff purchased surgical scalpels, gloves, alcohol and clove oil, and using this equipment, numbed the area and sliced across the center, hoping the object would ultimately either pop out or exfoliate.

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1 Instead, what happened was that after the area was sliced, first all the swelling seemed to
2 dissipate, and next, the swelling returned, but only on one side of the incision, and over a smaller
3 area. Observing this, the plaintiff discerned that an object was still present, but that it was likely
4 much smaller than she'd originally believed. The plaintiff now believes the object is closer to
5 1mm in diameter - too small to locate and excise without more sophisticated imaging or
6 detection equipment.

8 59.

9 The problems continued. On or around April 6, 2022 the plaintiff decided to
10 scrutinize her February 15, 2022 dental x-rays to see if there was possibly anything that had been
11 missed. Indeed, looking at one of the images showing the area around the extracted tooth #14,
12 the plaintiff noticed what appeared to a non-organic looking shadow which seems to match the
13 description of a patch-shaped piezoelectrical biomedical implant.



27 PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT,
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INJUNCTIVE RELIEF - 20

1 The plaintiff then initiated an effort to acquire the full-size resolution radiographs from the
2 February 15, 2022 visit.

3 60.

4
5 The plaintiff believes that this x-ray, and what it shows, is key evidence in support
6 of her allegations regarding a man-made structure implanted into her jaw.

7 61.

8 On April 7, 2022 the plaintiff went to see her primary care provider, Dr.
9 Warrington, to discuss the issue with the swollen area behind tooth #15. At this point, the
10 swollen area behind tooth #15 was very inflamed and visible. The plaintiff brought with her, on
11 her phone, a copy of the x-ray which seemed to show a rectangular patch-shaped implant. As
12 usual, the records from this visit contain a number of significant inaccuracies and shifting of
13 focus from physical suffering toward plaintiff's "emotional distress." Fabrication and
14 misdirection in the plaintiff's medical and dental records has been consistent between all
15 providers in recent years, a strong indication of conspiracy.

16
17 62.

18
19 On the plaintiff's request, Dr. Warrington made another referral to another
20 physician at Sunset Oral & Maxillofacial Surgery. This referral, too, was declined by the
21 physician, for the same reasons given by the previous physician - the problem was determined to
22 be "neurological." A follow up letter sent by plaintiff asking for more details as to how this
23 determination had been made did not receive a response.
24
25
26

27 PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT,
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INJUNCTIVE RELIEF - 21

1 63.

2 The ultimate effect of all of this was that Dr. Patel became the only oral surgeon
3 in Portland who was willing to consult with the plaintiff. This cutting off of options and
4 funneling and forcing the plaintiff into an ongoing relationship with a provider against whom she
5 already had a serious issue is indicative of meeting of minds – between *all* providers.
6

7 64.

8 On the afternoon of April 7, 2022, the plaintiff travelled to the office at
9 Advantage Dental Gateway where she was told that no higher resolution images of the February
10 15 x-rays existed. The plaintiff knew this was almost certainly false. After two weeks of effort,
11 she was able to access the higher resolution x-rays. However, Advantage Dental would only
12 provide the images in PNG format, not the original DICOM files.
13

14 65.

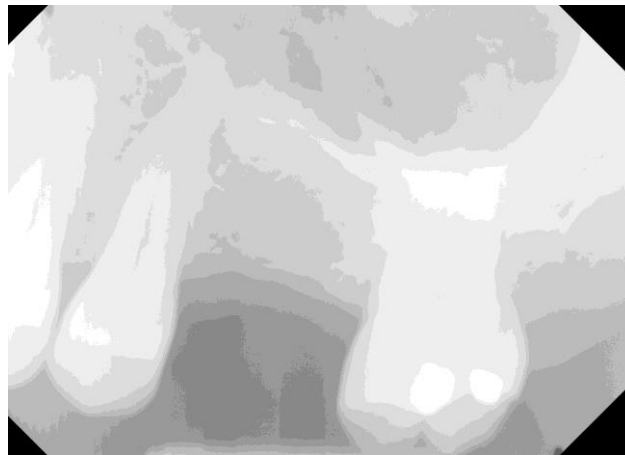
15 In the spirit of scientific inquiry³, the plaintiff decided to take a second x-ray of
16 just the area where she had seen the patch-shaped shadow. To this end, she returned to Roots
17 Dental, requesting a single x-ray. At first, on April 7, they agreed to take the x-ray, but on April
18 8, after seeing the exact area plaintiff wanted to x-ray, they began to push back, citing "radiation"
19 concerns. The plaintiff said that she thought a single radiograph would not be a problem. Roots
20
21

22
23
24
25 ³ “Replication is one of the key ways scientists build confidence in the scientific merit of results. When the result
26 from one study is found to be consistent by another study, it is more likely to represent a reliable claim to new
27 knowledge” *National Academies of Sciences, Engineering, and Medicine*. 2019. “Reproducibility and Replicability
28 in Science” Washington, DC: The National Academies Press. <https://doi.org/10.17226/25303>.

1 Dental requested contact information for plaintiff's primary care provider and agreed to take the
2 x-ray.

3 66.

4 As the x-ray was being taken, plaintiff noticed that the "buzzing" sound indicating
5 exposure time seemed abnormally long. When the radiograph itself appeared, it was white and
6 washed out looking, with a wide streak down the middle, precisely through the area plaintiff
7 wanted to examine more closely.
8



17 The radiograph was therefore not useful. The plaintiff asked about exposure time and was told
18 that the buzzing sound she heard had nothing to do with the exposure time. The plaintiff later
19 attempted to get more information about this by soliciting META data from the two radiographs
20 (2/15/22 from Advantage Dental and 4/8/22 from Roots Dental) to compare. However it appears
21 that unlike the Mipacs DICOM machine which Advantage Dental said they use, according to
22 Roots Dental, the GX-770 x-ray machine they use does not store META data such as exposure
23 time. Roots Dental said they could not provide this data because their machine doesn't store it.
24
25
26

27 PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT,
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INJUNCTIVE RELIEF - 23

1
2 67.

3 Records show that Dr. Dickenson called plaintiff's primary care doctor, Dr.
4 Warrington, immediately after this visit to ensure “we're all on the same page,” and requesting
5 “urgent callback.” It’s not clear what the conversation was about.
6

7 68.

8 The plaintiff had been aware of the hole in the crown since the tooth was
9 extracted, but did not understand that the hole was not a normal feature until April 2022 when
10 she googled "hole in dental crown." On April 21, 2022 plaintiff sent an email to Willamette
11 Dental describing the hole in the crown, and explaining her concern about Dr. Nguyen somehow
12 not seeing the hole on November 21, 2019. She attached to the email a photo of the carious
13 crown which she'd taken on February 2, 2022.
14



25 69.

26
27 PLAINTIFF’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT,
28 NEGLIGENCE PER SE, CIVIL CONSPIRACY) CLAIMS NOT SUBJECT TO MANDATORY ARBITRATION
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INJUNCTIVE RELIEF - 24

1 Since most of the problems with Advantage Dental had occurred at the Gateway
2 office, the plaintiff decided to try another provider within the same network, and made an
3 appointment with Advantage Dental's Broadway clinic to discuss the issues at hand. On May 12,
4 2022 plaintiff saw Dr. Polan at Advantage Broadway clinic. One of the things that plaintiff
5 suggested at this visit was an occlusal x-ray which is a type of dental x-ray designed to focus on
6 the roof or floor of the mouth. Dr. Polan said that these x-rays were mainly used by pediatric
7 dentists and that Advantage Dental did not have the proper equipment. Dr. Polan viewed the full
8 resolution radiograph from the February 15 visit and said he did not see anything but normal
9 bone tissue. He did not explain how "normal bone tissue" would read as a geometric shape like
10 the one visible in the area of the tooth 14 extraction.
11

12
13 70.

14 At this point, the plaintiff had been focusing energy on another route of discovery
15 via her primary care physician at Providence Cascade, which was to send inquiries to biomedical
16 researchers, seeking the types of equipment which could trace or detect frequency signals from
17 wireless biomedical implants. This line of inquiry was also stymied in various ways.
18

19 71.

20 On December 11, 2022 plaintiff decided to look more closely at the hole in the extracted crown
21 of Tooth 14, and to try and measure how deep it extended. She pulled the crown from the strong
22 box where she had been keeping it and when she went to examine it, she saw that the hole was
23 no longer present - it seems to have been filled in. Meanwhile, the plaintiff continues to
24 experience daily problems in the form of directed energy weapons attacks to her head, eyes,
25 mouth, and neck – especially focused around the area of tooth #14 and #15.
26

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INJUNCTIVE RELIEF - 25



POINTS AND AUTHORITIES

72.

Statute of Limitations

With regards to Willamette Dental and Head & Neck Surgical Associates, the statute of limitations is tolled by the discovery rule, by fraudulent concealment, and because all of these providers are part of a continuing common conspiracy. The plaintiff began to suspect that Dr. Patel had put an implant into the area in or around tooth #14 in January 2022. It wasn't until the following April that the plaintiff saw the shadow in the x-ray, that her suspicions were confirmed with demonstrative evidence. On January 31, 2022 Dr. Patel had told the plaintiff he had not put anything into the extraction area. All the dentists named in this action engaged in some form of concealment, either regarding the problems with the crown; the problems with the extraction area; the words, actions, and demeanor of the plaintiff, or some combination of these. These are patterns indicating conspiratorial intent.

73.

According to 18 U.S. Code § 371 conspiracy is a continuing tort, and the statute of limitations for conspiracy begins to run on the date of the last overt act. In this case, the plaintiff
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continues to experience pain and other disturbing effects around the area of tooth #14 and surrounding tissues, daily. Therefore the statute of limitations has not yet begun to run.

74.

Battery

Battery is a voluntary act intended to cause harmful or offensive contact. *Harris v. Pameco Corp.*, 170 Or App 164, 169, 12 P3d 524 (2000). Medical battery is usually defined as treatment without consent. “Whenever a surgeon or physician, without the patient's permission, performs an operation or renders medical treatment, he prima facie commits a battery.” McCoid, *A Reappraisal of Liability for Unauthorized Medical Treatment*, 41 Minn. L. Rev. 381 (1957). Covertly placing a biomedical implant into a patient’s tissues is prima facie battery. The fact that these implants are used to create pain and tissue damage – whether or not the dentists who placed them know this – also constitutes battery.

75.

Deceit

There have been a number of deceit-related actions either by the dentists, or by someone working in a common conspiracy with the dentists. In chart notes, there has been misdirection about the plaintiff’s dental hygiene. By way of explaining all of the fracturing, there have been false claims about the plaintiff grinding her teeth. The plaintiff was told the crown was in good condition, but then a month later, there was a hole in the bite surface and large infection reportedly beneath the tooth. Two years later, the hole in the extracted tooth was mysteriously filled. The plaintiff was told that she had a “bone chip” that would “dissolve.” Biomedical devices were placed into the plaintiff’s dental work, and when she complained of pain from

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1 them, she was called “delusional.” Gross fabrications about the plaintiff’s words actions and
2 demeanor were placed into her chart notes, and calls were made to emergency mental health
3 services in order to promulgate more damaging lies about the plaintiff.
4

5 76.

6 **Conspiracy**

7 A civil conspiracy is a combination of two or more persons acting together to
8 accomplish an unlawful purpose, or to accomplish a purpose not in itself unlawful by unlawful
9 means.” *Bonds v. Landers*, 279 Or. 169, 174 (Or. 1977) Conspiracy is not an independent tort –
10 in this case the independent torts include battery and deceit.
11

12 77.

13 **Negligence Per Se**

14 According to *Restatement (Third) of Torts §14*, an actor is negligent per se if she
15 violates a statute that is designed to protect against the type of accident or harm caused by her
16 conduct, and the plaintiff is someone the statute is designed to protect. No distinction is made as
17 to whether the violation is of a criminal or civil statute. *Moody v. Oregon Community Credit*
18 *Union*, 317 Or. App. 233, 236 (Or. Ct. App. 2022); *Nearing v. Weaver*, 295 Or. 702, 712 (Or.
19 1983). Statutory violations include (ORS 163.165(1)(b) or alternatively, ORS 163.160(1)(a) –
20 assault. Conspiracy is a statutory violation under ORS 161.405-161.485. In a conspiratorial
21 relationship (ORS 161.455), co-conspirators may be liable for the acts of others. “Civil
22 conspiracy does not merely allow *possible* tortfeasors to be held liable for a co-conspirator's tort;
23 it makes joint tortfeasors of those who conspire to commit the tort.” *Granewich v. Harding*, 150
24 Or. App. 34, 51 (Or. Ct. App. 1997)
25
26

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INJUNCTIVE RELIEF - 28

78.

PLAINTIFF'S CLAIMS FOR RELIEF

Against Willamette Dental

COUNT ONE

Battery, alternatively Medical Battery

COUNT TWO

Deceit

COUNT THREE

Negligence per se, alternatively Negligence

COUNT FOUR

Civil conspiracy

79.

Against Defendant Dr. Koichi Saito

COUNT ONE

Battery, alternatively Medical Battery

COUNT TWO

Deceit

COUNT THREE

Negligence per se, alternatively Negligence

COUNT FOUR

Civil conspiracy

80.

Against Defendant Dr. Jennifer Nguyen

COUNT ONE

Battery, alternatively Medical Battery

COUNT TWO

Deceit

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT, NEGLIGENCE PER SE, CIVIL CONSPIRACY) CLAIMS NOT SUBJECT TO MANDATORY ARBITRATION (JURY TRIAL DEMANDED ON ALL CLAIMS SO TRIABLE) PRAYER AMOUNT: \$10,000,000.00 PLUS INJUNCTIVE RELIEF - 29

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

81.

Against Defendant Head & Neck Surgical Associates

COUNT ONE
Battery, alternatively Medical Battery

COUNT TWO
Deceit

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

82.

Against Defendant Dr. Ashish Patel

COUNT ONE
Battery, alternatively Medical Battery

COUNT TWO
Deceit

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

83.

Against Advantage Dental

COUNT ONE
Battery, alternatively Medical Battery

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT, NEGLIGENCE PER SE, CIVIL CONSPIRACY) CLAIMS NOT SUBJECT TO MANDATORY ARBITRATION (JURY TRIAL DEMANDED ON ALL CLAIMS SO TRIABLE) PRAYER AMOUNT: \$10,000,000.00 PLUS INJUNCTIVE RELIEF - 30

COUNT TWO
Deceit

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

84.

Against Dr. Joseph Jamus

COUNT ONE
Battery, alternatively Medical Battery

COUNT TWO
Deceit

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

85.

Against Dr. Adam Polan

COUNT ONE
Battery, alternatively Medical Battery

COUNT TWO
Deceit

COUNT THREE
Negligence per se, alternatively Negligence

COUNT FOUR
Civil conspiracy

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (BATTERY, DECEIT, NEGLIGENCE PER SE, CIVIL CONSPIRACY) CLAIMS NOT SUBJECT TO MANDATORY ARBITRATION (JURY TRIAL DEMANDED ON ALL CLAIMS SO TRIABLE) PRAYER AMOUNT: \$10,000,000.00 PLUS INJUNCTIVE RELIEF - 31

86.

Against Roots Dental

COUNT ONE

Battery, alternatively Medical Battery

COUNT TWO

Deceit

COUNT THREE

Negligence per se, alternatively Negligence

COUNT FOUR

Civil conspiracy

87.

Against Defendant Dr. Ian Dickinson

COUNT ONE

Battery, alternatively Medical Battery

COUNT TWO

Deceit

COUNT THREE

Negligence per se, alternatively Negligence

COUNT FOUR

Civil conspiracy

DATED this 21st day of June, 2023

/s/ Erika Katrin Meyer

Erika Katrin Meyer, Plaintiff

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