

IN THE COMMON PLEAS COURT
UNION COUNTY

MARILYN A. COLEMAN
16475 MILLER ROAD
RICHWOOD, OHIO 43344

AND

OVIMMUNE, INC.
16575 MILLER ROAD
RICHWOOD, OHIO 43344

PLAINTIFF,

VS.

SALLY H. WILEY, INDIVIDUALLY,
AND AS AN EMPLOYEE OF
NORTH UNION SCHOOLS
27605 S.R. 37
RICHWOOD, OHIO 43344

AND

JANE DOE
(UNIDENTIFIED CO-CONSPIRATOR)

AND

JOHN DOE
(UNIDENTIFIED CO-CONSPIRATOR)

DEFENDANTS.

CASE NO. 2002 CV 0043

JUDGE _____

COURT OF COMMON PLEAS
UNION COUNTY
2002 FEB 21 PM 2:03
Clerk

COMPLAINT

(JURY DEMAND ENDORSED HEREON)

1. Plaintiff Marilyn A. Coleman, is a resident of Union County, Ohio.
2. Plaintiff Ovimmune, Inc., is an Ohio Corporation with a principal place of business in Union County, Ohio.
3. Defendant Sally H. Wiley ("Wiley") is an individual residing in Union County, Ohio and is the school nurse for North Union Schools in Union County, Ohio.

4. Defendant Jane Doe is at this time an unidentified individual or entity who also published false information concerning Plaintiffs.
5. Defendant John Doe is at this time an unidentified individual or entity who also published false information concerning Plaintiffs.

COUNT ONE – LIBEL

6. On or about March 31, 2001, said Defendant Wiley, in the course of her employment with Union County Schools, and other unknown Defendants re-published a statement of Plaintiffs'. (A copy of the statement is attached hereto and marked Exhibit "A") and made additional false statements in writing related to the use of this "Informed Consent" form by Plaintiffs. The meaning of the statements made by Defendants is that Plaintiffs were violating the law.
7. As a result thereof, Plaintiffs have suffered embarrassment, substantial business losses, loss of property and incurred attorney fees in refuting these false statements.

COUNT TWO – SLANDER

8. Plaintiffs restate the allegations of Paragraphs 1 through 6 as if fully rewritten herein.
 9. On or about March 31, 2001, Defendant Wiley and Defendants Does maliciously and falsely accused Plaintiff Coleman of handing out the forms (Exhibit A) and soliciting individuals for a study in violation of the law during a meeting held at Richwood Church of Christ.
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10. These statements were made to Douglas M. Loveland, a Senior Special Agent in the office of Criminal Investigation for the U.S. Food and Drug Administration, by Defendants.
11. Because of these false and slanderous statements an investigation has been initiated by the FDA which has caused damage to Plaintiffs' business in the sum of Fifteen Million Dollars (\$15,000,000.00), damage to Plaintiffs' reputations and Plaintiffs' good names have been injured.

WHEREFORE, Plaintiffs demand Judgment against Defendants in the sum of Fifteen Million Dollars (\$15,000,000.00) for compensatory damages, punitive damages, attorney fees and costs of this action.

J.C. DEBOARD & CO., L.P.A.

[Handwritten signature]

Susan N. Hayes, Esq. (0059250)
 5878 North High Street
 Worthington, OH 43085
 Telephone: (614) 847-1660
 Facsimile: (614) 847-0106
 Attorney for Plaintiff

JURY DEMAND

Plaintiff demands a trial by jury in this action.

[Handwritten signature]

Susan N. Hayes, Esq. (0059250)

COURT OF COMMON PLEAS
 UNION COUNTY
 2002 FEB 21 PM 3:50
 Clerk

INFORMED CONSENT

use of egg yolk containing
natural antibodies
against candida albicans/tropicalis



16475 Miller Rd Richwood, Oh 43344 USA
740 943 1371 fax 740 943 1373
www.ovimmune.com

Background

In the Middle Ages, farmers fed eggs from chickens in their barnyard to veal cattle to treat diarrhea. It worked because the chicken's immune system puts antibodies formed against all the barnyard bugs that could harm its newborn chick into the yolk of the egg. We now have demonstrated protective effects throughout the whole body of humans, as well as animals who eat the egg yolk from hens vaccinated with organisms such as candida (US Patent # 5585098 and CIP of same 1999).

Current Technology

The USDA has reviewed this technology, which in collaboration with the FDA have awarded GRAS status to it (Generally Regarded As Safe). Although as effective as an antibiotic, **THIS IS A FOOD, NOT A DRUG.** After all, chickens are normally vaccinated and the egg yolk consumed by millions of people each day.

Candida albicans/tropicalis are frequently called "yeast" infections. Yeast will invade any moist surface of the body and become systemic under certain situations. With the increase of HIV, transplant and long term antibody therapy for various ailments not least of which is cancer, the overgrowth of yeast has become quite common. *Candida albicans/tropicalis* have been implicated in many diseases such as thrush (candida of the mouth/esphogus), vaginitis, and gut problems. The egg product that you're consuming contains specific antibodies for 2 strains of *candida (albicans and tropicalis)*. The yolk has antibodies against candida because it has been specially included in the chicken's vaccination schedule. You should consume the product on the specific regime.

Please keep a good diary on your

- a) response to the egg (a list of symptoms follows), When did you first notice differences.
- b) diet during study
- c) weather conditions each day if weather affects your well being, include temp/humidly when possible
- d) response to any gut problems that may be associated with your disease such as constipation.
- e) response to any allergic reactions to agents which you are used to such as dust mites, molds, dander etc. It has been noted by some patients that allergic reactions are reduced, as well, with this product and we would like to substantiate these results.

NOTE: Please be sure that you have submitted confirmation of your candida infection (vaginal swab, candida confirmation on stool sample or blood test showing antibodies for candida for systemic infections). Follow up with the same tests at no SOONER than 4 weeks into your eating of this egg. Please let your physician know when your symptoms abate. Contact Dr. Coleman for more product if needed.

If you have any questions, feel free to call either Dr. Coleman 740 943 1371 or Dr. Kaminski @847 784 0011. You may read about our products at OvImmune.com or CandidaRx.com on the internet. There are no side effects or toxicity provided you are not allergic to eggs.

I have read and understand the above. _____ ss# _____ dob _____.

I was first diagnosed with _____ on _____. I am currently taking the following supplements _____, I used to take _____, _____, but _____ (reason) do not take them anymore. In the past, the most helpful solution to my problem has been _____. On a range of scores from 1 (worse) to 10 (best) the agents previously tried gave me a _____ response. Provide complete the symptom sheet provided 0, and 4 weeks after consuming the egg containing antibodies against candida.

Patient _____ Date _____ Therapist/Physician phone # _____

Address _____ City _____ St _____ Postal Code _____ phone _____

COURT OF COMMONS
 PLEASE
 SIMON GRUBB
 FEB 21 PM 3:50
 CLERK