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FILED
 SIXTH JUDICIAL CIRCUIT
 12 JUN 29 2016
[Signature]
 CLERK OF THE CIRCUIT COURT
 CHAMPAIGN COUNTY, ILLINOIS

8

IN THE COURT OF CLAIMS OF THE STATE OF ILLINOIS

Your Name: DERVANNA H.A. TROY-McKOY)	CASE NO: <i>10c L100</i>
Claimant)	COMPLAINT FOR FALSE LIGHT
Vs.)	
GEORGE GOLLIN, BRAD SCHWARTZ, AND)	\$ 14 300 000.00 (\$100,000 for each False
THE BOARD OF GOVERNORS OF THE)	Light Claim Count)
UNIVERSITY OF ILLINOIS)	AMOUNT CLAIMED
Respondents)	

9

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23		

JURISDICTION

Plaintiff complains and for causes of action alleges as follows:

1. Plaintiff is an individual and is now, and at sometimes mentioned in this complaint was, a resident of FLORIDA.
2. Plaintiff at most times mentioned in this complaint was a resident of Lauderhill, Florida, Broward County.
3. Plaintiff worked as Research Scientist and Educator (occupation), in the ORLANDO, Florida, Seminole County, for 15 years, since 2000 (year of start of occupation).
4. Plaintiff was an active student of St. Luke School of Medicine – Liberia, in good standing
5. Plaintiff has during all this time enjoyed a good reputation, both generally and in his occupation, and as a student of St. Luke School of Medicine.
6. Defendant George Gollin is an individual and is now, and at all times mentioned in this complaint was, a resident of the State of Illinois, and an employee of the University of Illinois as defined by Illinois Pension Code. Section 14-103.05.
7. Defendant the University of Illinois is now, and at all times mentioned in this complaint, was a corporation organized and existing under the laws of the State of Illinois, with its principal place of business in Illinois in Champaign County, Illinois.
8. The true names of defendants DOES 1 through 50, inclusive, are unknown to plaintiff at this time. Plaintiff sues those defendants by such fictitious names. Plaintiff is informed and believes, and based on that information and belief alleges, that each of the defendants designated as a DOE is legally responsible for the events and happenings referred to in this complaint, and unlawfully caused the injuries and damages to plaintiff alleged in this complaint.

1 9. Plaintiff is informed and believes, and based on that information and belief alleges, that at
2 all times mentioned in this complaint the defendants were the agents and employees of
3 their codefendants and in doing the things alleged in this complaint were acting within the
4 course and scope of such agency and employment.

5 10. On February 8, 2012, a Federal lawsuit, 2:11-cv-06322-RGK-SH, was filed by Dr. Jerroll
6 Dolphin and St. Luke School of Medicine - Liberia in United States District Court, Central
7 District California, against George Gollin, the University of Illinois, and others, for a
8 multitude of charges of misconduct. The case was dismissed in 2013 based on immunity
9 of George Gollin, the University of Illinois, and the State of Illinois granted by the 11th
10 Amendment of the US Constitution: *The Judicial power of the United States shall not be*
11 *construed to extend to any suit in law or equity, commenced or prosecuted against one of*
12 *the United States by Citizens of another State, or by Citizens or Subjects of any Foreign*
13 *State.*

14 11. Dr. Jerroll Dolphin, the President and majority shareholder of St. Luke School of Medicine
15 - Liberia and St. Luke School of Medicine - Ghana, filed a lawsuit in the Illinois Court of
16 claims, No. 16CC0228.

17 12. Thus, the appropriate court to sue the defendants is the Illinois Court of Claims, 705 ILCS
18 505/8.

20 FACTS OF CASE

23 Plaintiff's Background

25 13. Before enrollment at St. Luke School of Medicine - Liberia, plaintiff has acquired a BS
26 Triple major in Aerospace, Aeronautical and Biomedical Engineering, and acquired
27 NMD, IMD at St. Luke School of Medicine holistic medicine EXHIBIT D. I obtained a

1 DNM Canada. EXHIBIT F. I was a medical student at St. Luke School of Medicine
2 MD, Ph.D distance learning faculty and completed 23 waived and examination, courses,
3 EXHIBIT D.

4 14. Plaintiff was accepted as St. Luke School of Medicine - Liberia student in February 2003.
5 Exhibit A.

6 15. I paid \$ 5000 tuition to St. Luke School of Medicine - Liberia. Exhibit B.

7 16. While I was a basic science student at St. Luke School of Medicine - Liberia, I took 4 of
8 MD, Ph.D. program and submitted a MSc. Desitation thesis. Exhibit C. I took my basic
9 science courses at St. Luke School of Medicine. I did not complete SLSOM's Basic
10 Science Comprehensive Examinations.

11 17. While I was a basic science student at SLSOM, 19 examinations were waived and 4
12 examination a sum total of 23 medical courses acquired at St. Luke School of medicine.
13 Exhibit D.

14 18. I did not complete clinical science rotations at St. Luke School of Medicine - Liberia.
15 Exhibit E.

16 19. I did not take the United States Medical Licensing Examination while at St. Luke School
17 of Medicine - Liberia. Exhibit F. I took the North America, CANADA Medical
18 Examination, Exhibit F.

19 20. I did complete Externship/internship at CRAD WELLNESS CLINIC, CANADA.
20 Exhibit G.

21 Reckless Disregard
22

- 1 21. George Gollin published false statements concerning St. Luke School of Medicine –
2 Liberia and its students from 2003 until the present implying that St. Luke School of
3 Medicine - Liberia was a fraudulent institution and that its students were paying money in
4 exchange for a medical doctor's degree and diploma. Exhibits 1 – 5 are some examples.
- 5 22. In 2005, Mohammed Shariff of Interim Government of the Republic of Liberia, used
6 Gollin's false statements to attack the reputation of St. Luke School of Medicine – Liberia
7 on radio, television, and newspapers, often quoting Gollin's false statements word per
8 word.
- 9 23. In April 2005, Shariff forced the Director of National Commission on Higher Education
10 (NCHE) to mail a letter to the Educational Commission for Foreign Medical Graduates to
11 unlist St. Luke School of Medicine - Liberia from its list of recognized medical schools,
12 using Gollin's statements as justification for their actions. Exhibit 6.
- 13 24. In May 2005, the ECFMG sent a letter to St. Luke School of Medicine - Liberia stating its
14 reasons for unlisting St. Luke School of Medicine - Liberia. Exhibit 7
- 15 25. In July 2005, St. Luke School of Medicine - Liberia filed a lawsuit in the Supreme Court
16 of the Republic of Liberia against the Republic of Liberia to undo the malicious acts of
17 Mohammed Shariff and the NCHE. Exhibit 8.
- 18 26. In August 2005, the Liberian Supreme Court grants SLSOM and issues an order of
19 mandamus, xxxxx, which is still in effect today. Exhibit 9.
- 20 27. In September 2006, St. Luke School of Medicine filed a lawsuit in the High Court of
21 Liberia against the government of the Republic of Liberia for accreditation as a Medical
22 School. Exhibit 10 – 20.

1 28. In October 2006, the High Court awards St. Luke School of Medicine - Liberia a
2 judgement for \$160,000,000 by default against the Republic of Liberia. Exhibit 21.

3 29. In a similar lawsuit in Ghana, On November 9, 2009, the Ghana High Court ruled in favor
4 of St. Luke School of Medicine and ordered the National Accreditation Board to accredit
5 SLSOM.

6 30. On or about November 2009, defendants sent to the National Accreditation Board of the
7 Republic of Ghana, a document, approximately 91 pages, named by the defendants,
8 Analysis of the Practices and Policies of The St. Luke School of Medicine in Recent
9 Years, George Gollin, Professor of Physics University of Illinois at Urbana-Champaign,
10 November 11, 2009, hereinafter referred to as "the Document", (16CC0228, Exhibit 1,
11 below). The defendants, acting with reckless disregard, placed the plaintiff before the
12 public in false light in a manner that was highly offensive to a reasonable person.
13 Lovgren, 534 N.E.2d at 989 (quoting Restatement (Second) of Torts § 652(E)).

14 31. On or about April 2010, Gollin published the same Document on his University of Illinois
15 website for approximately 2 years or more. Exhibit 2 is the very same Document
16 downloaded from Gollin's website. Again, the defendants, acting with reckless disregard,
17 placed the Plaintiff and St. Luke School of Medicine before the public in a false light in a
18 manner that was highly offensive to a reasonable person. See Lovgren, 534 N.E.2d at 989.

19 **Falsehood**

20 32. The Plaintiff includes as evidence 16CC0228 Exhibit 3, False Statements of George Gollin
21 against Jerroll Dolphin and St. Luke School of Medicine in His 91-Page Document, 160
22 false statements offensive to the Plaintiffs, as 160 False Light separate complaints against

1 the defendants. Exhibit 3, False Statements of George Gollin In The 91-Page Document,
2 is hereinafter referred to as "the Response".

3 33. Exhibit 3 counters Gollin's false statements with the truth and references the evidence that
4 will be provided in SLSOM's Evidence Packet. Gollin's claims in his 91-page document
5 are not mere opinions, but are clearly statements presented to the reader as if they were
6 true. See, e.g., *Raveling v. HarperCollins Publishers*, 2004 WL 422538, at 2 (N.D. Ill.
7 Feb. 10, 2004).

8
9
10 **Offensiveness**

11 34. Each and every one of the 160 false statements of the defendants in their 91-page
12 Document are highly offensive to the plaintiff and would be highly offensive to a
13 reasonable person who knows the truth. See Exhibit 3. See *Lovgren*, 534 N.E.2d at 989.
14 *Kolegas v. Hefel Broad. Corp.*, 607 N.E.2d 201 (Ill. 1992)

15
16 **Identification of Plaintiff**

17 35. In the Document, Gollin identifies the plaintiff by name more than xx times and refers to
18 the plaintiff innumerable times more in the use of words "student of", "students of",
19 "graduate of", or "graduates of" or otherwise descriptive phrases, as well as identifying
20 himself as the author of the Document or the referenced documents.

21
22 **Public Disclosure**

1 36. In November 2009, the Document was forwarded to the Ghanaian Ministry of Foreign
2 Affairs, to which, a letter dated November 20, 2009, was sent by Mrs. Gloria Poku,
3 Deputy Director Americas Bureau, to Mr. Kwame Datey of the National Accreditation
4 Board, 16CC0228 Exhibit 4.

5 37. On December 11, 2009, the National Accreditation Board sent a letter to the Attorney
6 General and Ministry of Justice, referencing the Document as evidence of misconduct
7 against the plaintiff. The Ghana Attorney General received the Letter and Document on
8 December 15, 2009. See Exhibit 5. Both the Document and the letters (16CC0228
9 Exhibits 4 and 5) were then circulated in Ghana amongst the high government officials,
10 ministries, and politicians to further embarrass the plaintiffs.

11 38. The National Accreditation Board subsequent filed an Appeal of the High Court ruling on
12 or about December 20, 2009, based on the same 91-page Document of George Gollin. As
13 of the date of this filing, no ruling has come from that appeal.

14 39. In April 2010, the Defendants placed this same document on their University of Illinois
15 website for more than 2 years. It is safe to say that publishing on the Internet for the whole
16 world to see is public disclosure. See Lovgren, 534 N.E.2d at 989.

17
18 **Fault**

19 40. The defendant was at fault when he caused the false implications present in the Document.
20 He states his, himself is the author of the document, and, he is a professor at the University
21 of Illinois (page 1 of the Document).

22 41. Furthermore, the defendant showed malice by enlisting Alan Contreras of the Oregon
23 Office of Degree Authorization, see 16CC0228 Exhibit 6a and 6b, and the letter of Brad
24 Schwartz of the University of Illinois, College of Medicine, 16CC0228 Exhibit 7, to make
25 false and malicious statements against the plaintiff and SLSOM. The letter of Alan

1 Contreras (16CC0228 Exhibits 6a and 6b) and the letter of Brad Schwartz (16CC0228
2 Exhibit 7) are hereinafter referred to as the "Letters".

3 42. The purpose of the Document and the letters of Contreras and Schwartz was to stop the
4 accreditation of St. Luke School of Medicine in Ghana, and is clearly stated in the
5 Document and Letters. Lovgren, 432 N.E.2d at 989-991.

6 43. The Document and Letters, sent to the Ghanaian National Accreditation Board, are
7 libelous on its face and portrays the plaintiff in false light. It clearly exposes plaintiff to
8 hatred, contempt, ridicule and obloquy because it charges the plaintiff with committing
9 criminal and outlandish fraudulent acts to which the plaintiff has never been charged or
10 convicted in any court of law or civil court in any country anywhere in the world.

11 44. The Documents and Letters were seen and read on or about November 2009 through
12 March 2010 by members of the Ghanaian National Accreditation Board, who then sent the
13 document to other cabinet level ministries of the Republic of Ghana, such as the Ministry
14 of Education, the Ministry of Health, the Ministry of Justice, and other ministries and
15 departments of the Republic of Ghana, newspapers, and important people in Ghana and
16 elsewhere too numerous to delineate in this complaint.

17 45. Defendant George Gollin's demonstrated his malice, hatred and ill will toward plaintiff
18 and the desire to injure him, in that defendants had expressed a desire to "get" plaintiff, see
19 [http://healthjournalism.org/blog/2009/12/foe-of-degree-mills-sets-sights-on-medical-](http://healthjournalism.org/blog/2009/12/foe-of-degree-mills-sets-sights-on-medical-school/)
20 [school/](http://healthjournalism.org/blog/2009/12/foe-of-degree-mills-sets-sights-on-medical-school/) or 16CC0228 Exhibit 8, below. However, there are dozens of other locations on
21 the internet where Gollin has expressed his hatred and ill will towards the plaintiff and St.
22 Luke School of Medicine.

1 46. The Document referred to plaintiff by referencing SLSOM's students throughout, was
2 made of and concerning the plaintiff, and was so understood by those who read the
3 document to portray the plaintiff as a criminal and fraud.

4 47. Each and every statement made by the defendants, identified in 16CC0228 Exhibit 3 (160
5 statements), is false as it pertains to plaintiff. For example, from Exhibit 3, False
6 Statement 9, "*The school's catalog misrepresents its physical facilities, either*
7 *through inaccurate descriptions in text, or deliberately misleading photographs of*
8 *buildings and grounds that could reasonably be thought to represent a campus,*
9 *but do not;*". In fact, SLSOM did not misrepresent its physical facilities in Liberia or
10 Ghana, nor can the defendants prove that SLSOM misrepresented its physical facilities in
11 any way or manner.

12 48. More examples of false statements made by George Gollin, identified in Exhibit 3

13 a. "*The school awards academic credit without requiring demonstration of*
14 *mastery of the subject matter for which the credits are awarded,*" The plaintiff, a
15 (former) student of St. Luke School of Medicine - Liberia, never, ever, been given
16 credit for a course with demonstration of mastery, and invites Gollin and the
17 University of Illinois to prove otherwise. This statement has damaged the
18 reputation of the plaintiff, causing his to appear as a person who fraudulently
19 attended medical school. In fact SLSOM's examinations, more than 140
20 examinations, are intensive and encompassing.

21 c. "*The school's articulation agreements with other schools reveal that the*
22 *school awards transfer credits regardless of the level of mastery of the subject*
23 *matter associated with the transferred credits,*". SLSOM has no articulation

1 agreement that awards transfer credits regardless of the mastery of the subject
2 matter and invites Gollin and the University of Illinois to prove otherwise. This
3 statement of Gollin damages the reputation of the PLAINTIFF.

4 d. *"The school masks its internet domain registration information behind a*
5 *privacy service, hiding the identities of its administrative officers;"* SLSOM does
6 not mask its internet domain registration, and invites Gollin and the University of
7 Illinois to prove otherwise. This statement makes the plaintiff appear to attend a
8 fraudulent institution.

9 e. *"The school will not reveal the names of its instructors or the identities of*
10 *its senior administrators;"* SLSOM has revealed the names of its instructors, to
11 which Gollin and the University of Illinois has published false and misleading
12 information concerning the same. Again, this makes the Plaintiff appear to be
13 attending a fraudulent institution.

14 f. *"The school shares a significant number of instructors or administrators*
15 *with other schools known to hold any of the attributes listed above."* SLSOM
16 does not share instructors or administrations with other school at all, and invites
17 Gollin and the University of Illinois to prove otherwise. Again, this makes the
18 Plaintiff appear to be attending a fraudulent institution.

19 g. See 16CC0228 Exhibit 3 for the balance of the false statements and the
20 plaintiff's response to the false statements.

21 49. In this paragraph, please simply state simply how the loss of SLSOM's accreditation
22 damaged you financially, reputationally, and socially.

1 St. Luke School of Medicine had provide me a promising future that would evolve my intellectual
2 business empire. Thus, my business was re-launch on a foundation to florist beyond boundaries;
3 however, FALSE LIGHT, further, destroy these endeavors.

4 Damages I continuously experiencing as a MD, Ph.D. Student/Candidate of St. Luke
5 School of Medicine, from the year 2003 throughout to the year 2015.

6 (1) Loss of Reputation: \$ 100 000.00

7
8 (2) Loss of Time: \$ 100 000.00

9
10 (3) Loss of Prestige: \$ 100 000.00

11
12 (4) Loss of Opportunities:

13
14 (a) transferred to another medical school: \$ 100 000.00

15
16 (b) Loss of license opportunities: \$ 100 000.00

17
18 © Miss Contracts opportunities: \$ 100 000.00

19
20 (5) Financial losses: \$ 100 000.00

21
22 (6) Psychological: \$ 100 000.00

23
24 (7) Loss of Time: \$ 100 000.00

25
26 (8) Socially: \$ 100 000.00

27
28 (9) Shame and Disgrace \$ 100 000.00

1
2 Total per year = 11 x \$ 100 000.00 =

3
4 = \$ 1 100 000.00

5
6 Total for thirteen years = 13 x \$ 1 100 000.00 =

7
8 = \$ 14 300 000.000. Fourteen millions and three hundred thousand dollars.

9
10
11 **Summary of Losses:**

12 My interest to launch St. Luke School of Medicine through my partnership as a

13 Candidate/Student and a service provider, was to benchmark St. Luke School of Medicine

14 among the most promising medical school, delivering cutting edge medical training worldwide.

15 These opportunities would secured my companies: Galaxy Scientific Technology GST and

16 International Institute of Integrative Medicine and Technology an average dividend of one

17 hundred millions US dollars: \$ 70 000 000.00 US dollars over five 5 years. Proof of my

18 endeavors to achieve these remarkable substantiated estimates are exemplified in EXHIBITS

19 C through I.

20 Exhibits C and D and were the platform through with the world would have embraced my

21 intellectual empire. Both companies, EXHIBIT I, named above, was in line to utilize NASA

22 technology to deploy at full length, through St. Luke School of Medicine.

23 EXHIBIT I, were satellite strategies I launch to ensure fluid funding available to drive my

24 business operations through partnership with St. Luke School of Medicine. However,

1 FALSE LIGHT has totally destroyed these endeavors. The subversive attack on me by
2 FALSE LIGHT, has destroyed every foundation I developed and echoed like a devastating
3 catastrophe through the City of New York Park and Recreation, EXHIBIT I, where I had
4 completed a Public Health assignment. Therefore, further devastated my very promising
5 intellectually medical future worldwide.
6

7 50. As a result of the publication of the above-described Document, plaintiff has suffered loss
8 of his reputation, shame, mortification, and injury to his feelings, all to his damage in the
9 total amount of \$ 14 300 000.00, or \$100,000 for each false statement, the total amount to
10 be established by proof at trial.

11 51. At all times since the document was received by the National Accreditation Board of
12 Ghana, the defendants could have renounced the misrepresentations contained within it.
13 However, the defendants wanted to continue to mislead the National Accreditation Board,
14 the public-at-large, and those to whom the National Accreditation Board sent the
15 document, and to maintain the defendants' false light portrayal of the plaintiff.

16 52. The plaintiff has suffered financially and by opportunity due to the defendants false light
17 accusations, to which the defendants have never denied the veracity of which.

18 53. The defendant still berates plaintiff with falsehoods and half-truths on the internet. See
19 16CC0228 Exhibit 9 - BPPE Abatement Order 2012 and Exhibit 10 – BPPE Abatement
20 Order 2015, Printed, herein, July 9 2015. However, the defendants do not display the
21 results of the Abatement Orders investigation and conclusion, which will be included in
22 SLSOM's evidence package.
23

24 **Conclusions**

- 1 I. Something false was stated by the defendants in every false statement identified in
2 16CC0228 Exhibit 3, false statements 1-160. Lovgren, 432 N.E.2d at 989-991.
- 3 II. The Defendants, acting with reckless disregard, placed the plaintiff, DERVANNA
4 TROY-McKOY, before the public in a false light manner that was highly offensive to
5 a reasonable person. Lovgren, 432 N.E.2d at 989-991.
- 6 III. The false facts stated are "highly offensive to a reasonable person." Lovgren, 432 N.E.2d
7 at 989-991.
- 8 IV. The falsehoods in question have identified the plaintiff, many by name. Lovgren, 432
9 N.E.2d at 989-991.
- 10 V. The false statement were disclosed to the public. See Lovgren, 534 N.E.2d at 989, to
11 which, the defendants did publish the Document on the World Wide Web for
12 approximately 2 years. Lovgren, 432 N.E.2d at 989-991.
- 13 VI. The plaintiff has shown that the defendant was at fault when he caused the false
14 implication. Lovgren, 432 N.E.2d at 989-991.
- 15 VII. The plaintiff has shown that the defendant acted with "actual malice". See Lovgren,
16 432 N.E.2d at 989-991.
- 17 VIII. The plaintiff has further demonstrated that defendants, despite knowing the truth of
18 the situations they presented to the public, have not corrected nor posted updated
19 information or documents acknowledging the incorrectness of their previous
20 statements. Thus leaving the public-at-large to continue believing what they have
21 previously, and falsely, presented.
- 22

23 **Prayer for Relief**

1
2 WHEREFORE, plaintiff demands judgment against defendants, and each of them, for:

3 1. The Defendants should publish a renunciation of the Document in public media across the
4 United States, Ghana, and other countries that were affected by the publishing of the
5 Document.

6 2. Compensatory damages according to proof, at \$100,000 for each claim against the
7 defendants, with false light claims, amounting to \$ 14 300 000.00 total.

8 2. Because of defendants' malice in publishing, distributing, and perpetrating false information
9 about the plaintiff, this plaintiff seeks punitive damages in \$500,000, an amount to be established
10 by proof at trial.

11 3. Interest as allowed by law;

12 4. Such other and further relief as this court may deem just and proper.
13
14

15 DATED: 11/5/15

16 Dervanna H. A. Troy-McKoy, Plaintiff
17
18

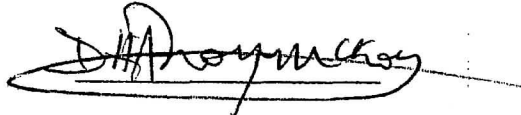
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VERIFICATION

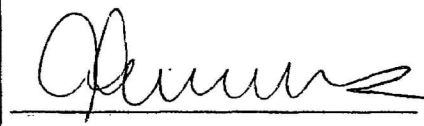
DERVANNA
I, TROY-McKoy

am the Plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

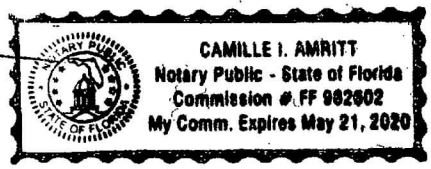
I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Lauderdale Lake ^{FL 33313} (City, State, Country).

DATED: June 14, 2016 
(Your Name)

Sworn to me this 14th day of June, 2016



Notary Public



1. **Dervanna H. A. Troy-McKoy**
2. **Dervanna H. A. Troy-McKoy**
3. **1192 NW 40th Ave., Suite 514, Lauderhill, Florida 33313**
4. **Phone: (646) 667-4689,**
5. **Fax: NONE**
6. **E-mail: galaxy-gst@msn.com**

1. **Apply to SLSOM:**

Between 1998 and 2003

2. **Accepted at SLSOM:**

February 2003

3. **Transfer from St. Luke School of Medicine/Natural Medicine. EXHIBIT D**

EXHIBIT A



ST. LUKE SCHOOL OF MEDICINE

Information Office, 8516 11th Avenue, Inglewood, California 90305, USA

(323) 565-2723; Fax: (323) 372-3757

Website: <http://www.stluke.edu/>

E-mail: admissions@stluke.edu

February 14, 2003

Dervanna H. A. Troy-McKoy
4052 Krieger Sports Dr.
Orlando, FL 32839
USA

NOTICE OF ACCEPTANCE

Dear Dervanna H. A. Troy-McKoy:

Based on the information provided in your application, St. Luke School of Medicine has accepted you into the Second Year, Basic Sciences, of our four-year course, beginning in February 2003, at your choice of campuses, for a dual M.D.-Ph.D. degree. The Ph.D. program will be in Medical Science. This will leave you with one and a half semesters of Basic Science instruction, and approximately 80 weeks of Clinical Science studies to complete the Doctor of Medicine curriculum with Liberia registration, or 92 weeks with Ghana registration. A copy of your preliminary convalidation (waivers) report is attached. Please indicate below your preferred country of registration, Liberia or Ghana. Please sign and return a complete copy of this NOTICE OF ACCEPTANCE.

This acceptance is contingent upon our receipt of your original transcripts and examination reports. We recognize that it may be difficult to obtain copies of your transcripts and that you may want some of them returned. For those transcripts that you want returned, you should obtain notarized, color copies, and send them along with your original transcripts and a return address envelope. We will return your originals after review.

You will be required to pay a \$600.00 non-refundable matriculation fee, immediately. Your tuition for basic science courses will be reduced to \$1500.00 USD per trimester of 16 weeks, as will be the cost of your clinical science rotations. Your tuition is due before you start your courses. The reduction in fees is due to your service to St. Luke School of Medicine. These fees are subject to change.

If you choose to do clinical rotations in the United States, you must pay for your own student medical malpractice insurance before you start your rotations.

Please send your payments to the address above, payable to:

St. Luke School of Medicine

Thank you for choosing St. Luke School of Medicine. St. Luke School of Medicine is proud to have you as a student. Please expect to begin studies February 2003 in Ghana, Liberia, or the USA. A St. Luke School of Medicine Student Handbook will be sent to you soon.

Jerroll Dolphin, M.D.
President, St. Luke School of Medicine

EXHIBIT A



Office of Academic Affairs • College of Engineering • Rutgers, The State University of New Jersey
98 Brett Road • Piscataway • NJ 08854-8058 • (732) 445-2212/2213 • FAX: (732) 445-5313

July 29, 1998

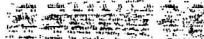
TO WHOM IT MAY CONCERN:

This is to certify that Mr. Dervanna Troy-McKoy was awarded a B.S. degree in "Applied Sciences in Engineering" in January 1995. This program is the individualized major within the College of Engineering.

Mr. Troy-McKoy transferred to the College of Engineering from Mercer County Community College and was enrolled continuously from Spring 1991 through Fall 1994. In addition to the core math, science, and basic engineering courses which are required of all engineering majors at Rutgers, he selected engineering and technical electives which provided him with a combined specialty in biomedical and aeronautical/aerospace engineering.

I may be contacted if additional information regarding Mr. Troy-McKoy's undergraduate program is required.

Sincerely,



A handwritten signature in dark ink, appearing to read "Fred R. Bernath".

Fred R. Bernath
Associate Dean

EXHIBIT B – Tuition Paid to SLSOM

Tuition Paid	Date (MM/YYYY)
\$5000 (include expected reimbursement expenses, not yet re-reimburse)	
Wages from services provided = \$ 20 000.00	

ESTIMATEED PAID \$ 5 000.00

Estimated is also based on service (EXHIBIT A) provided to St. Luke School of Medicine, since 2003

(EXHIBIT A), is estimated on my previous average hourly rate **\$ 100.00/hr**, shown Immediately, below:

The image shows a document with a table structure, likely a pay stub. The text is extremely faded and noisy. Some legible fragments include:

- Top section: EARNINGS, DEDUCTIONS, YEAR TO DATE, NET PAY
- Bottom section: DEPARTMENT, EMPLOYEE, SOCIAL SECURITY, PAY PERIOD

Is estimated as a low estimate of \$ 20 000.00, off-setting fees.

Exhibit C – Examinations the Plaintiff Took at SLSOM

SEMESTER 1 COURSES

HOURS	580	Exams
Human Anatomy	200	6
Human Neuroanatomy	80	4
Human Physiology	160	5
Histology	60	3
Embryology	40	2
PH 1 – Biostatistics	40	2

22 Exams

SEMESTER 3 COURSES

HOURS	520	Exams
Systemic Pathology 1	120	12
Pharmacology	120	6
Behavioral Science	80	2
Nutrition	40	1
Epidemiology & Preventive Medicine	60	1
Abuses (Drug, Child, Spouse, etc.)	40	1
Human Sexuality	20	1
PH 3 - Public Health Practice	40	1

25 Exams

Pre-Clinical Examinations	NONE
Basic Science	NONE
Comprehensive Exam 1	NONE
Basic Science	NONE
Comprehensive Exam 2	NONE
Basic Science	NONE
Comprehensive Exam 3	NONE
USMLE Step 1	NONE

SEMESTER 2 COURSES

HOURS	560	Exams
Medical Biochemistry (6)	160	6
Medical Genetics (2)	60	2
Microbiology	80	4
Immunology	40	2
Parasitology & Tropical Med.	40	2
General Pathology	100	5
PH 2- Public Health Policy	80	1

22 Exams

SEMESTER 4 COURSES

HOURS	700	Exams
Systemic Pathology 2	160	12
Physical Diagnosis	80	2
Medical Diagnosis	40	1
Intro to Patient Care & Treatment	160	25
Intro to Clinical Medicine	80	2
Intro to Radiology	80	1
PH 4 - Community Service	100	

43 Exams & Quizzes

EXHIBIT D

Dervanna Troy-McKoy

Semester or Clinical Year	Course and Exam Name or Number	Reason for Waiver
1st	8	CONVALIDATION
2nd	6	CONVALIDATION
3rd	4	CONVALIDATION
4th	1	CONVALIDATION

St. Luke School Of Medicine

Moravia



Liberia

Department Of Natural Medicine

TO ALL TO WHOM THIS LETTER MAY COME GREETINGS

Be it known that the authorities of the Medical School on the recommendation of the Professorial of the Faculty of the Department of Natural Medicine, in association with A.M. Douglass School of Medicine, University of Liberia and Southern Graduate Institute for Natural Medicine, registered and incorporated in the United States of America, and by virtue of the powers vested in them have conferred on

Gertrude H. A. Troy-McRoy

Who has satisfactorily pursued and successfully completed the prescribed course of study and has also complied with all other requirements for graduation, therefore the degree of

Doctor of Naturopathic Medicine

With all the rights, privileges and honors pertaining thereto. In testimony whereof, this diploma is granted bearing our signatures and the impress of the Seal of the Medical School, Department of Natural Medicine. Granted at St. Luke School of Medicine, Department of Natural Medicine.

This 18th day of March, 2005.

Joseph A. [Signature]
President of School of Natural Medicine



[Signature]
President of Medical School

H. D. Winstead M.D.
Board of Directors

[Signature]
Board of Trustees



ST. LUKE SCHOOL OF MEDICINE - LIBERIA

Website: <http://www.stluke.edu> E-mail: info@stluke.edu



<u>SEMESTER 1</u>	Hours	<u>600</u>	<u>SEMESTER 2</u>	Hours	<u>620</u>
Human Anatomy X		160	Medical Biochemistry X		160
Human Neuroanatomy X		80	Medical Genetics X		60
Histology X		60	Microbiology (passed)		100
Embryology X		40	Immunology (passed)		80
Human Physiology X		160	Hematology 2006		40
PH 1- Biostatistics and Medical Writing X		40	Parasitology & Tropical Medicine (passed)		40
Ethics and Legal Medicine X		20	General Pathology X		100
Nutrition X		40	PH 2 - Public Health Policy X		40
<u>SEMESTER 3</u>	Hours	<u>620</u>	<u>SEMESTER 4</u>	Hours	<u>600</u>
Systemic Pathology 1		120	Systemic Pathology 2		140
Pharmacology (passed)		120	Physical Diagnosis		80
Molecular Biology 2005		100	Medical Diagnosis		40
Behavioral Science		80	Intro Radiology X		80
Abuses (Drug, Child, Spousal, Elderly) X X		20	Intro Patient Care and Treatment		140
Human Sexuality X		20	Intro Clinical Medicine		80
Intro Obstetrics & Gynecology		60	Basic Science Review - SLSOM Basic Science		40
Epidemiology & Preventive Medicine X X		60	Comprehensive Examination and USMLE part 1		
PH 3 - Community Medicine X		40			

X: represents from convalidation report. See attachment.

Exhibit E – Clinical Science Rotations Completed

Student: Name: Dervanna Troy-McKoy

Clinical Science Rotation	Weeks Required	Weeks Completed	Location (Hospital, City, State, Country)	Approx. dates mm/yyyy – mm/yyyy
Emergency Medicine	4	NONE		
General Surgery	12	NONE		
Internal Medicine	12	NONE		
OB/GYN	12	NONE		
Pediatrics	8	NONE		
Family Medicine	6	NONE		
Psychiatry	6	NONE		
Pathology	4	NONE		
Emergency Medicine	4	NONE		
Emergency Medicine	4	NONE		
Emergency Medicine	4	NONE		
Ob/GYN Elective	4	NONE		
Neurosurgery	4	NONE		
Ophthalmology	4	NONE		
National Service	4	NONE		
Total Weeks	92 weeks			

Exhibit F

Student Name: Dervanna Troy-McKoy

Exam	Results (pass, fail)	Date (yyyy)
USMLE Part 1	NONE	
USMLE Part 2	NONE	
USMLE Part 3	NONE	
ECFMG Certificate	NONE	

Exhibit F

Foreign National Medical Licensing Examination Results –

Student Name: Dervanna Troy-McKoy

Exam Name	Country	Results (pass)	Date (yyyy)
Examining Board of Natural medicine- North America	CANADA	PASS	2006



**THE EXAMINING BOARD OF NATURAL
MEDICINE PRACTITIONERS - NORTH AMERICA**

AFFILIATED WITH THE WORLD ORGANIZATION OF NATURAL MEDICINE (WONM)
ACCREDITED BY THE AMERICAN NATUROPATHIC ASSOCIATION (ANMA)

Member Branches: EBNMP - USA, EBNMP - Canada

April 11, 2006

Dr. Dervanna Troy-McKoy, NMD, MSc., BS (Eng.)
1057 East, 92 St.
New York, NY 11236

Dear Dr. Troy-McKoy,

**Re: THE EXAMINING BOARD OF NATURAL MEDICINE PRACTITIONERS -
NORTH AMERICA (EBNMP)**

We are please to inform you that your application for registration to the Examining Board for a licensed Doctor of Natural Medicine has been received and acknowledged. However, we await the balance of your examining fees for the final processing to be effective.

Consequently, we will mail your certification to your mailing address.

Sincerely,


Sheila McKenzie-Barnswell, RDH, DNM, HD, PhD
President

80 Nashdene Rd, Bldg A, Unit 202, Building A, Scarborough, Ontario M1V 5E4 PHONE: 416-412-3575/416-756-9355
www.boardofnaturalmedicine.com info@boardofnaturalmedicine.com

Exhibit G

Internship, Residency, House-Jobs

Student Name: Dervanna Troy-McKoy

Internship, Residency, House- Jobs	License Number	Hospital Name & Location	Dates
Externship/Internship		CRAD WELLNESS CLINIC	2006

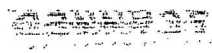


Exhibit H. – Graduate Certifications – Your Name

Certification	License Number	Hospital Name & Location	Date
EXHIBIT F		CRAD WELLNESS CLINIC	2006

EXHIBIT H

Exhibit I –

Name: Dervanna Troy-McKoy

Official Discrediting:

Discrediting	Letter (yes)	Discrediting Agency	Date
Vocational Training Development Institute	letter	Vocational Training Development Institute	2008
Northern Caribbean University	Letter	Northern Caribbean University	2003

4. If you do not have a discrediting incident, then you do not have grounds for a lawsuit.



Vocational Training Development Institute



GORDON TOWN ROAD
C/O. Box 775, Kingston 6, Jamaica, W.I.
Tel: (876) 927-1100, 927-1632, 927-1700
Fax: (876) 927-4304
E-mail: info@vtdi.org

February 26, 2009

Mr. Dervanna Troy - McKoy
Christiana P.O.
Manchester
Jamaica

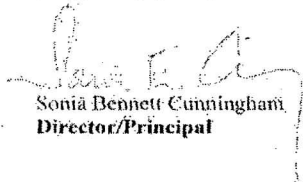
Dear Mr. McKoy:

In October 2007 you enrolled in the NVQ Level 4 in Assessment and completed training in March 2008. As a part of the administrative process, before certification, academic documents for all students must be verified. In your case, certificates were submitted for an undergraduate degree from Rutgers University and a doctoral degree from St. Luke School of Medicine. While the undergraduate degree has been verified, the representation made of having a doctoral certification remains unsubstantiated to date and is a material factor in the decision to certify you as an Assessor.

Therefore we are requesting that you apply to the St. Luke School of Medicine in Liberia for a transcript to be sent directly to the VTDI by April 27, 2009 to facilitate the completion of the processing of your certification. We urge you to meet this requirement as soon as possible as neither the VTDI nor the NCTVET will be able to issue your certificate without same.

Should there be any questions, please do not hesitate to contact the institution, in writing, before April 27, 2009 so that your concerns can be addressed.

Respectfully yours,


Sonia Bennett Cunningham
Director/Principal

NORTHERN CARIBBEAN UNIVERSITY

(Formerly West Indies College)
St. Andrew, Jamaica, W.I.

HUMAN RESOURCES DEPARTMENT

August 5, 2003.

Mr. Dervanna Troy-McKoy
Main Street
Christiana P.O.
Manchester

Dear Mr. Troy-McKoy:

Sincere greetings from Northern Caribbean University.

The Human Resource Department uses this medium to express our thanks to you for your interest in serving this institution and for attending the interview session with us.

From all indications, the panel was impressed with your positive approach and the level of preparation displayed. However, we are unable to offer you employment at this time but will keep your information on file for future reference.

Best wishes to you.

Sincerely,



Patricia Allen
ACTING DIRECTOR

cil