

**CIRCUIT COURT  
TWELFTH JUDICIAL CIRCUIT  
SARASOTA COUNTY, FLORIDA**

**ERIC ANDERSON,**  
Plaintiff

v.

**Case No: 2023 CA 000999 NC**

**SARASOTA MEMORIAL HOSPITAL,**  
Defendant.

**COMPLAINT**

**Intentional Infliction of Emotional Harm**

**I. BACKGROUND AND FACTS OF THE CASE:**

1. The travail of this pursuit — this lawsuit — was forced upon the Plaintiff (Eric Anderson) on or shortly after June 2, 1958 at Sarasota Memorial Hospital (i.e. restraining the child is kidnapping, and cutting the child is battery); the emotional distress becomes worse, if such a thing is possible, subsequent to hard won understanding of the origin of said travail. To wit, the subsistence of the illegal practice of routine/ritual juvenile

circumcision without valid consent traumatizes and victimizes newborn ***citizens***, where the Plaintiff, now fully aware of what transpires, is severely distressed. This illegal practice causes traumatic iatrogenic harm to vulnerable minds, and puts the newborn at risk of severe lifelong mental and physical ailments, for no rational reason, when imposed absent medical indication for the taking of such a risk.

2. As a citizen and taxpayer of the State of Florida, Plaintiff Eric Anderson, in the present case seeks to bring the illegal and arbitrary practice of ***forced elective circumcision*** conducted on children, at Sarasota Memorial Hospital, into the cognizance of this Honorable court. This suit is pursued so that the Plaintiff may be relieved of the emotional burden that the continuance of this practice now places upon him.
3. The most basic medical ethics prohibit the practice of routine/ritual infant circumcision. Hospital personnel are *good people* to the point of complicity. For example, if the CEO of Sarasota Memorial Hospital was to order the error remedied, said CEO might upset the status quo and be pushed out of his position via political infighting. Therefore, Plaintiff's suit will relieve the

CEO at the same time that newborn boys are relieved, and hence the Plaintiff himself is relieved. As the hospital management is hobbled by the psycho-social phenomenon just described, a large monetary penalty must be associated with this lawsuit (\$25,000,000US), thus allowing the management to then demonstrate to circumcision practitioners and defrauded parents that risk-management considerations prohibit the continuance of the denial of Fundamental Rights to newborn boys.

4. Outside of a Summary Judgment — history demonstrates that Judges are burdened by the same aforementioned psycho-social pressure — Plaintiff demands to plead his case before a jury.
5. Plaintiff seeks to bring to the notice of this Honorable court that the above named Defendant, Sarasota Memorial Hospital, has miserably failed to stop this illegal practice of circumcision, and instead of obstructing these practices through the summoning of law enforcement under FS 827.03 (Aggravated Child Abuse), the Defendant is acting in dereliction of its Fiduciary Duty and sheltering the perpetrators of the illegality, all while honoring the Fundamental Rights of juvenile female citizens.

6. Sarasota Memorial Hospital has no right to hold an identifiable group of citizens as less than the rest of the Citizenry. The State (i.e. Florida State Constitution, Section 2, Basic Rights: “All natural persons, female and male alike...”) and Federal Constitutions require equal treatment of all citizens and equal protection of laws. And the Defendant is miserably failing in discharge of its lawful duty on these counts. And therefore, the Plaintiff presents this complaint to compel the Hospital to its legal and ethical duty.
7. Adult citizens, male or female, are in no way impeded from pursuing ***elective*** prepuce amputation surgery of their own volition, thus rendering mute any argument for the use of force.

## **II. GROUNDS OF THE CLAIM (the Supremacy Clause, the plain meaning rule, Mischief Rule and the Golden Rule):**

1. U.S. Constitutional Amendment 1 protects the newborn Citizen’s right to choose their own religion, including that of natural whole man.
2. Amendment 5 guarantees the newborn Citizen the Right to Due Process.

3. Amendment 9 provides that even though freedom from genital cutting is not enumerated for male citizens — as it is enumerated at the state and federal level for female citizens — the male child's rights are not abrogated; the laws against Child Abuse are not overcome even without the enumeration.
4. Amendment 14 requires that male and female Citizens be treated equally by the Courts, establishes that Constitutional Rights are obtained at birth, and contains the Due Process Clause (i.e. “***No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.***”).

### **III. JURISDICTION:**

This Honorable court has the pecuniary, territorial and subject matter jurisdiction to adjudicate, try, and decide the case, and

therefore the Plaintiff submits to the jurisdiction of this Honorable Court.

**IV. PRAYER:**

The Plaintiff seeks to pray to this Honorable court that:

1. The Defendant shall be held liable for dereliction and must be adjudicated and must be awarded adequate punishment in accordance with law.
2. Any other order in the interest of justice against the Defendant and in favor of the Plaintiff.

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