

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS**

-----X  
CHRISTOPHER BASTARDI, ET. AL.  
Plaintiffs,

**VERIFIED COMPLAINT**  
Index No.

-against-

MOUNT SINAI MEDICAL CENTER  
TAKEDA PHARMACEUTICALS  
PRACTICE OF ALLA IOSPA, M.D.  
TARUN JAGGI  
PRIME COMPUTER SOLUTIONS  
APPLE, INC.  
SALVATORE BASTARDI  
MICHAEL O'LEARY, ESQ.  
JAMES TRUITT, III ESQ., SHERWOOD & TRUITT  
LAUREN BANNON  
HORIZON FELLOWSHIP  
WESLEY CLARK  
VERIZON and VERIZON FIOS  
INSTAGRAM, A META COMPANY  
GOOGLE

Defendant

-----X  
PLAINTIFF, pro se, complaining that DEFENDANTS either separately or together participated in a conspiracy that targets PLAINTIFF on the basis of sexual orientation, causing tortuous interference, privacy violations, and the financial and reputational dismantling of him, alleges:

1. The Plaintiff is over 18 years of age at the time of the commencement of this action.
2. Plaintiff **CHRISTOPHER BASTARDI** (herein "Mr. Bastardi") is a resident of the State of New York, residing at 84 Bay 19<sup>th</sup> Street, Brooklyn, New York 11214.

3. Plaintiff is outspoken on issues that have included religious extremism, healthcare reform, drug legalization, property rights, eminent domain, regime change in Iran, and the dismantling of cartels in Central and South America.
4. Plaintiff has also been on a longstanding quest to memorialize the memory of his late cousin **ANTHONY MILELLA** (herein "Mr. Milella") who was electroshocked at Creedmoor and Pilgrim State psychiatric centers under the guise of schizophrenia, a disease that can be treated by such means, but which can also be quite harmful should that diagnosis be wrong.
5. Relatives of Mr. Milella will attest that his medical diagnosis was falsified due to pressure regarding his personal characteristics, especially from the Roman Catholic community of his time. This suit is not meant to ridicule or otherwise condemn schizophrenia or any other health condition. **It is intended to shed light on how false diagnoses are used to harm minority populations.**
6. Plaintiff has extensive experience in health policy and questioned a **TAKEDA PHARMACEUTICAL** prescription of **Trintellix** by his psychiatrist, **ALLA IOSPA** (herein "Dr. Iospa") and a subsequent removal of his health proxies at **MOUNT SINAI MEDICAL CENTER**, who were replaced by his father, **SALVATORE BASTARDI** (EXHIBIT A).
7. Plaintiff was under the mental health care of Dr. Iospa, who is familiar with conditions he experienced while married, throughout his divorce, and the period following.
8. Plaintiff sought the consultation of **TARUN JAGGI** (herein "Mr. Jaggi") of **PRIME COMPUTER SOLUTIONS** to combat issues including hacking, content placement, identity theft, and more that occurred at the behest of **WESLEY CLARK BASTARDI** (herein "Mr. Clark") and potential agents.
9. Actions of Mr. Jaggi including his establishment of all logins and passwords, an external drive PLAINTIFF refuses to use, and a network established resulted in tortuous interference by his being blocked from earning a living and conduct his life.
10. Mr. Jaggi failed to carry out duties to address content placed by outside sources on Mr. Bastardi's network and electronics. Mr. Jaggi's actions resulted in reputational damage that was further enabled by entities that included co-Defendants.
11. Plaintiff recently contacted his public officials to advocate for eminent domain on property of **HORIZON FELLOWSHIP**.
12. Plaintiff is in dispute with his sibling **LAUREN BANNON** (herein "Mrs. Bannon") over property he owns which is on the same street as Horizon Fellowship.

13. Plaintiff recently raised concerns about attorney **MICHAEL O'LEARY** during his time as counsel to the Estate of Frances Lazzara and his apparent counsel to the Estate of Louise Martini.
14. **JAMES TRUITT**, attorney for Mrs. Bannon has acted in a manner in opposition with his oath as an attorney.

#### **PRAYER FOR RELIEF**

Plaintiff seeks immediate restoration of electronic devices impacted by any and all Defendants, belonging to Plaintiff, his companies, and his agents.

Plaintiff also seeks collective damages of \$25 billion and to those impacted.

Plaintiff seeks immediate closure of the Mount Sinai West Rehabilitation unit and an independent investigation that will determine conditions upon which it shall reopen.

In addition, Plaintiff seeks an injunction to stop any and all research underway related to that unit and that any and all patients receive the care they independently desire with any and all costs paid by Mount Sinai Medical Center and a review of all health care proxies conducted within 72 hours.

Plaintiff maintains the right to add co-plaintiffs, co-defendants and to otherwise amend it, either partially or in its entirety.

**Any and all acts against PLAINTIFF, et al. shall be deemed retaliatory.**

# VERIFICATION

Christopher L. Bastardi, of full age, hereby certifies and affirms that the allegations detailed in this complaint are true to Plaintiff's knowledge

Date: December 10, 2025



Christopher L. Bastardi

Notary Public:

Sworn before me this 10<sup>th</sup> day of December 2025.



**DEBRA G HILLAIRE**  
**NOTARY PUBLIC, STATE OF NEW YORK**  
Registration No. 01HI6151156  
Qualified in Kings County  
My Commission Expires: 12-6-2026



**INTENTIONALLY LEFT BLANK**

# EXHIBIT A

Christopher Bastardi  
*former Director of Public Affairs & Communications*  
New York State Senate Health Committee

December 10, 2025

The Honorable Leticia James  
New York Attorney General

The Honorable Amy Paulin and The Honorable Gustavo Rivera  
Assembly and Senate Health Committee Chairs

Attorney General James, Assemblywoman Paulin and Senator Rivera:

I am meeting with Chairwoman Paulin on December 17, 2025; however, I prefer not to wait until then to have a very important matter addressed.

Never in my life has my father, Salvatore Bastardi, been my health proxy. In fact, every single physician I have every interacted with is aware of this. I never wanted him to have to decide regarding a life-or-death matter. My position on this is so strong and consistent that I did not even have my father wait for me during surgeries alone.

This past summer, I was introduced to a program at Mount Sinai that I intend to address during the upcoming December 17<sup>th</sup> meeting. It was in the paperwork for the Mount Sinai program, which was partially signed under duress, that I saw my father's name pre-printed on otherwise blank forms that I had to complete.

At a meeting with Mr. Javier Zatocki of Mount Sinai, I relayed my position on my father's role as proxy in terms that could not have been more clear. In fact, I specifically stated that my father was not to be my proxy. I believe I was coerced into removing my longstanding proxies from this program, Mr. Eric Peterson and Mr. Michael Kaplan. I also believe that Mr. Zatocki intentionally removed these proxies from the entire Mount Sinai system in my chart there. If so, this would indicate something warranting further inquiry. That is the point, though, of an investigation. Mr. Zatocki did state at the conclusion of our program proxy discussion, "I will leave it blank."

Prior to the Mount Sinai appointment. I questioned whether my psychiatrist, Dr. Alla Iospa, was being offered or otherwise induced to write prescriptions, specifically for Trintellix (a Takeda product, per attached homepage printout).

This question came after I told Dr. Iospa during a phone conversation that I forgave my ex-husband following a tumultuous period. She replied:

***"You do not have the mental capacity to forgive. You need in-patient treatment and a new prescription regiment."***

That statement is why she is no longer my psychiatrist.

She leveraged my use of substances in a way that violates the hypocritic oath. She knew that I did not like Trintellix based on a 2024 prescription and indicated herself the impact that it could have when used with certain substances. She is well-aware of prior substance use (currently illegal although my commitment to changing that is known) even stating that she thought I became "manic" when it was previously prescribed (which is impossible for her to actually diagnose given she has not seen me in person in quite some time, an issue which Chairwoman Paulin recalls is of importance to me).

This past year, she insisted on prescribing Takeda's Trintellix anyway.

I stopped taking it when I became suicidal in a way never before for three days in July and she knew I got better once I stopped taking the prescription.

I would like both the proxy matter and the way that this drug is prescribed investigated by your respective offices.

I have a hypothesis regarding Mount Sinai, drug company influence, and the gay community that I think deserves close scrutiny. This includes two incarcerations via hospitalization I experienced that were involuntary and without Miranda rights read where I was forced to take more drugs against my will. Following these experiences, I have unexplained pain and otherwise odd feelings along my spine.

In a subsequent brain MRI, I received different readings from two different physicians, something which Dr. Iospa is unaware of; however, I have also been unable to obtain a follow-up neurology appointment at Mount Sinai. They never call me back.

One physician described me having a lipoma on my brain that he referred to as "a worm."

I remain at your disposal to answer any questions you may have and thank you in advance.

Sincerely,



Christopher Bastardi

cc: The Honorable Robert Kennedy, Jr., Secretary of Health and Human Services  
Dr. Alla Iospa  
Dr. Brendan Carr, CEO, Mount Sinai  
The Honorable Gustavo Rivera, State Senate Health Committee Chair  
The Honorable Brad Hoylman-Sigal, State Senate Judiciary Committee  
The Honorable Kemp Hannon, former Health Committee Chair  
The Honorable Richard Gottfried, former Health Committee Chair





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## What is TRINTELLIX® (vortioxetine)?

TRINTELLIX is a prescription medicine used in adults to treat a certain type of depression called Major Depressive Disorder (MDD). TRINTELLIX has not been shown to be safe and effective for use in children.

[How TRINTELLIX works](#)

Patient portrayal. Individual results may vary.

MDD impacts more than your mood—it can have emotional, physical, and cognitive symptoms.



I'm ready to learn more about MDD for myself or a loved one



I'm ready to find out more about TRINTELLIX



I've been prescribed TRINTELLIX and want to know what to expect when getting started



Doctor discussion guide

Get a personalized guide to support a conversation with your doctor about whether TRINTELLIX may be right for you.

[Start now](#)



Side effects

It's important to know the possible side effects of a treatment when considering your options.

[See side effects](#)



Patient stories

Get an inside look at the lives of real MDD patients, and how they worked with their doctor to manage their MDD.

[Hear their stories](#)



**IMPORTANT SAFETY INFORMATION** about TRINTELLIX

[Expand](#)





## The TRINTELLIX Savings & Support Program

Did you know you may pay as little as \$10 for either a 30-day or 90-day prescription with the TRINTELLIX Savings Card?\*

Even if you're not currently prescribed TRINTELLIX, you can still receive support. By enrolling in tAccess (at no cost to you), you can customize your experience through support tools like chats with an advisor, texts and emails.

\*All TRINTELLIX patients can join the tAccess Support Program. Only commercially insured patients ages 18 and older are eligible for the TRINTELLIX Savings Card. The TRINTELLIX Savings Card cannot be used by patients in federal-, state-, or government-funded healthcare programs, or by cash patients. Savings of up to \$100 per 30-day or \$300 per 90-day prescription, with maximum total savings of \$1,300 over one year. Restrictions apply. See Savings Card for full Eligibility Requirements and Terms & Conditions.

[Learn about tAccess](#)



## Still have questions?

Check out our FAQ page for answers.

[Get answers](#)

## IMPORTANT SAFETY INFORMATION

### Suicidal Thoughts & Actions

TRINTELLIX and other antidepressants increase the risk of suicidal thoughts and actions in people 24 years of age and younger, especially within the first few months of treatment or when the dose is changed. TRINTELLIX is not for use in children. Depression or other mental illnesses are the most important causes of suicidal thoughts or actions. Pay close attention to any changes, especially new or sudden changes in mood, behavior, thoughts, or feelings, or if you develop suicidal thoughts or actions. Call your doctor or get emergency help right away to report any of these, or if you have symptoms such as suicidal thoughts or actions, impulsivity, aggressive or violent actions, depression, anxiety or panic attacks, agitation, restlessness, anger, irritability, trouble sleeping, an increase in activity or talking, or other unusual changes in behavior or mood; especially if they are new, worse, or worry you.

### Who should not take TRINTELLIX?

Do not start or take TRINTELLIX if you:

- are allergic to vortioxetine or any of the ingredients in TRINTELLIX
- are taking, or have stopped taking within the last 14 days, a medicine called a Monoamine Oxidase Inhibitor (MAOI), including the antibiotic linezolid or intravenous methylene blue

Do not start taking an MAOI for at least 21 days after you stop treatment with TRINTELLIX.

### What should I tell my doctor before taking TRINTELLIX?

Before taking TRINTELLIX, tell your doctor:

- about all your medical and other health conditions
- if you are pregnant or plan to become pregnant, since TRINTELLIX may harm your unborn baby. Taking TRINTELLIX during your third trimester may cause your baby to have withdrawal symptoms after birth or to be at increased risk for a serious lung problem at birth. Tell your doctor right away if you become or think you are pregnant while taking TRINTELLIX
- if you are breastfeeding or plan to breastfeed, since it is not known if TRINTELLIX passes into your breast milk

Tell your doctor about all the medicines you take, including prescription and over-the-counter medicines, vitamins, and herbal supplements, since TRINTELLIX and some medicines may cause serious side effects (or may not work as well) when taken together. **Especially tell your doctor if you take:** medicines for migraine headache called triptans; tricyclic antidepressants;



**IMPORTANT SAFETY INFORMATION about TRINTELLIX**



treat mood, anxiety, psychotic, or thought disorders, including selective serotonin reuptake inhibitors (SSRIs) and serotonin norepinephrine reuptake inhibitors (SNRIs); or medicines used to treat seizures or convulsions.

### **What are the possible side effects of TRINTELLIX?**

TRINTELLIX may cause serious side effects, including:

- **Serotonin syndrome:** A potentially life-threatening problem that can happen when you take TRINTELLIX with certain other medicines. Call your doctor or go to the nearest emergency room right away if you have any of the following signs and symptoms of serotonin syndrome: agitation; seeing or hearing things that are not real; confusion; coma; fast heart-beat; changes in blood pressure; dizziness; sweating; flushing; high body temperature; shaking, stiff muscles, or muscle twitching; loss of coordination; seizures; nausea, vomiting, diarrhea.
- **Increased risk of bleeding:** Taking TRINTELLIX with aspirin, NSAIDs, warfarin or blood thinners may add to this risk. Tell your doctor right away about any unusual bleeding or bruising.
- **Manic episodes:** Manic episodes may happen in people with bipolar disorder who take TRINTELLIX. Symptoms may include: greatly increased energy; racing thoughts; unusually grand ideas; talking more or faster than usual; severe problems sleeping; reckless behavior; excessive happiness or irritability.
- **Discontinuation syndrome:** Suddenly stopping TRINTELLIX may cause you to have serious side effects including: nausea; sweating; changes in your mood; irritability and agitation; dizziness; electric shock feeling; tremor; anxiety; confusion; headache; tiredness; problems sleeping; hypomania; ringing in your ears; seizures.
- **Eye problems:** TRINTELLIX may cause a type of eye problem called angle-closure glaucoma in people with certain other eye conditions. You may want to undergo an eye examination to see if you are at risk and receive preventative treatment if you are. Call your doctor if you have eye pain, changes in your vision, or swelling or redness in or around the eye.
- **Low levels of salt (sodium) in your blood:** Low sodium levels in your blood that may be serious and may cause death can happen during treatment with TRINTELLIX. Elderly people and people who take certain medicines may be at a greater risk for developing low sodium levels in their blood. Signs and symptoms may include headache; difficulty concentrating; memory changes; confusion; weakness and unsteadiness on your feet which can lead to falls. **In more severe or more sudden cases, signs and symptoms include:** seeing or hearing things that are not real; fainting; seizures; coma; stopping breathing.
- **Sexual problems:** Taking TRINTELLIX may cause sexual problems. Symptoms in males may include: delayed ejaculation or inability to have an ejaculation, decreased sex drive, or problems getting or keeping an erection. Symptoms in females may include: decreased sex drive, or delayed orgasm or inability to have an orgasm. Talk to your doctor if you develop any changes in your sexual function or if you have any questions or concerns about sexual problems during treatment with TRINTELLIX.

The most common side effects of TRINTELLIX include:

- nausea
- constipation
- vomiting

These are not all the possible side effects of TRINTELLIX. Tell your doctor if you have any side effect that bothers you or does not go away.

You are encouraged to report negative side effects of prescription drugs to the FDA. Visit [www.fda.gov/medwatch](http://www.fda.gov/medwatch) or call 1-800-FDA-1088.

### **What is TRINTELLIX (vortioxetine)?**

TRINTELLIX is a prescription medicine used in adults to treat a certain type of depression called Major Depressive Disorder (MDD). TRINTELLIX has not been shown to be safe and effective for use in children.

There is a pregnancy registry for females who are exposed to antidepressants during pregnancy. The purpose of the registry is to collect information about the health of females exposed to antidepressants and their babies. If you become pregnant during treatment with TRINTELLIX, talk to your healthcare provider about registering with the National Pregnancy Registry for Antidepressants at 1-866-961-2388 or visiting online at

<https://womensmentalhealth.org/research/pregnancyregistry/antidepressants/>

*For additional Important Safety Information, click here for [Medication Guide](#), and discuss with your doctor.*

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1-877-TAKEDA-7 (1-877-825-3327).

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**IMPORTANT SAFETY INFORMATION** about TRINTELLIX