

1625 Mobile Homes For Rent

Why rent when you can own? Contract for Deed: 2-bedroom mobile home \$500/month. 3-bedroom mobile home \$550/month. \$1,000 down payment. Call (605)661-8629 for details.

1635 Commercial Rentals



1250 sq.ft. of climate controlled indoor storage. This space would also function very well as finished office space. Conveniently located with easy drive up access. Available immediately. Call (605)665-6919 for more information.

J & V Storage, new 10x20 units. Call (605)668-0694 or (605)660-4115.

1650 Houses For Sale



1207 Picotte • \$118,500
3-bedroom, 2-bath, remodeled. Kelly Filipis, America's Best Realty, kfbest@iw.net (605)660-0900 ; (605)260-1600.



217 Henry, Freeman
2+ bedroom, 1 1/2 bath. Open floor plan, 2 garages, move-in ready. \$37,500 Century 21, Emma (605)661-2224.



2710 Abbott • \$199,999
New 3-bedroom, 3 bath. Great kitchen, oversized garage. Century 21, Kathy (605)661-0389.



301 W. 31st
8-Condo's one price. Great investment property. Kelly, America's Best Realty (605)660-0900.

High Quality Homes

Two newly constructed homes in Applewood area. Spacious lots, still time to choose some of your options. Many extras, daylight basements, oversized covered decks, etc. Call Kirby Hofer (605)660-1422.

1655 Mobile Homes For Sale

Would you like a brand new mobile home all set up in my court on a contract for deed at tremendous savings? Call me, lets deal, Kenny, Nationwide Mobile Homes. (605)665-0822.

1660 Acreage - Lots For Sale

ACREAGE PRICED TO SELL

Great Hobby Farm or Hunting/Fishing recreational property. 8.6 acres, close to Devil's Nest, Missouri boat docks. 2-story, 4-bedroom, 3 bath farmhouse with new furnace, new water heater, new dbl-pane windows, new kitchen cabinets. Good well water, small pasture, fruit orchard, corral and full shelter belt of established trees surrounding house. \$68,000. Firm. (402)860-2186.

Clean property, B-2 Highway Business, 184x120 deep, 504 W. 12th St., Yankton, (605)661-6652.

Lots available north of Hillcrest Golf Course. Ridgeway North Development. Call Kirby Hofer, (605)665-0524 or (605)660-1422.

1685 Want To Buy Real Estate

Attention we buy used mobile homes. Cash on the spot. Call now (605)665-0822

We pay cash for used mobile homes! (712) 252-4381.

1685 Want To Buy Real Estate

Want to buy 3 bedroom Yankton house with garage, in need of repair or renovation, will pay cash (605)665-1995.

1705 Items \$100 or Less

10 Xbox 360 games, \$10 each. (605)665-2286.

Lane beige fabric recliner in excellent condition, \$75.(605)661-3838

1755 Clothing

COATS FOR SALE
All Size XL Junior Girls
4 Winter Coats, 1 Spring Coat (white). \$15/each. Can email photos of coats Call 605-661-3020.

1770 Home Appliances

28 cu. ft. GE side by side clean steal refrigerator in door water and ice. 4 years old. \$400.00 (605)665-0552

1775 Home Furnishings

One couch, good condition, tan in color, \$275 (605)664-9841.

1790 Lawn - Garden

Husqvarna 23 HP lawn tractor with 48" mower deck and 42" front mount snow blower, rear weights, tire chains and winter cab shelter. All for \$2,500 (605)695-3242.

Sears Craftsman 46 inch deck, 21 HP Briggs and Stratton turn tight hydrostatic riding lawn mower. 6 Bushel 2 bin soft bagger, extra new blade, used 2 and a half summers. \$1,350 firm.

Craftsman 33 inch, 357cc dual stage snowblower with EZ steer, heated hand grips, electric start, used less than 8 hours. \$1,250 firm.

Both for \$2,400 firm. Call (605)661-0321.

1850 Agriculture

Corn stalk bales and rough hay. Large quantities, will haul. Sioux City. (712)258-2586.

2010 Legal and Public Notices

12+9+16+23+30
STATE OF SOUTH DAKOTA)

)(SS: COUNTY OF YANKTON)

IN CIRCUIT COURT
FIRST JUDICIAL CIRCUIT
CIV. #13-445
SUMMONS

KIM ANDREWS,

Plaintiffs,

vs.

ALLEN A SOSSAN, D.O., also known as ALAN A SOOSAN, also known as ALLEN A. SOSSAN, LEWIS & CLARK SPECIALTY HOSPITAL, LLC, a South Dakota Limited Liability Company, and RECONSTRUCTIVE SPINAL SURGERY AND ORTHOPEDIC SURGERY, P.C., a New York Professional Corporation,

Defendants.

TO THE ABOVE NAMED DEFENDANTS, ALLEN A. SOSSAN, D.O. a/k/a ALAN A SOOSAN, a/k/a ALLEN A SOOSAN AND RECONSTRUCTIVE SPINAL SURGERY AND ORTHOPEDIC SURGERY, P.C., 2200 NO. 49TH STREET, NORFOLK, NEBRASKA, 68701:

YOU ARE HEREBY SUMMONED AND REQUIRED to answer the Complaint, of the above-named Plaintiff, a copy of which is hereto annexed and herewith served upon you, and to serve copies of your Answer on the Attorney for the Plaintiff at his office at P.O. Box 879 - 721 Douglas Avenue, Ste. 102, Yankton, SD 57078, within thirty (30) days after the service of this Summons upon you, exclusive of the day of service, and if you fail to answer within the said time, judgment by default may be rendered against you for the relief requested in the Complaint. A copy of this Summons and Complaint for medical malpractice have been filed with the Clerk of the above captioned Court.

Dated this 3 day of December 2013.

JAMES LAW, P.C.
/s/ Timothy L. James
P.O. Box 879
721 Douglas, Ste. 102
Yankton, SD 57078
(605)665-0594
Attorney for Plaintiff

STATE OF SOUTH DAKOTA)
)(SS: COUNTY OF YANKTON)

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IN CIRCUIT COURT
FIRST JUDICIAL CIRCUIT
CIV. #13-445
COMPLAINT AND
JURY DEMAND

KIM ANDREWS,

Plaintiffs,

vs.

ALLEN A SOSSAN, D.O., also known as ALAN A SOOSAN, also known as ALLEN A. SOSSAN, LEWIS & CLARK SPECIALTY HOSPITAL, LLC, a South Dakota Limited Liability Company, and RECONSTRUCTIVE SPINAL SURGERY AND ORTHOPEDIC SURGERY, P.C., a New York Professional Corporation,

Defendants.

COMES NOW Plaintiff, Kim Andrews, and for her Complaint against the above-named Defendants, Allen A. Sossan, D.O., a/k/a Alan A. Soosan, a/k/a Allen A. Soosan, Lewis & Clark Specialty Hospital, LLC, and Reconstructive Spinal Surgery and Orthopedic Surgery, P.C., states and alleges as follows:

JURISDICTION AND VENUE

1. Plaintiff, Kim Andrews, is a resident of Nebraska.

2. Defendant, Allen A. Sossan, D.O. ("Sossan") was at all times material hereto a resident of the State of Nebraska and engaged in the practice of medicine in the States of Nebraska and South Dakota and licensed as a physician under the laws of both of those States and at all times material was providing medical services to Plaintiff and at all times material was an employee, agent, and shareholder of Defendant, Lewis & Clark Specialty Hospital, LLC, and Defendant, Reconstructive Spinal Surgery and Orthopedic Surgery, P.C., and acting within the scope of this employment with both.

3. Defendant, Lewis & Clark Specialty Hospital, LLC ("Hospital") was at all times material hereto a South Dakota Limited Liability Company organized for the purpose of providing medical services with its principal place of business in Yankton, South Dakota and at all times material had under its control and direction as its employee, shareholder and agent, Defendant, Sossan, who was acting within the scope of his employment and agency, thus subjecting Hospital to vicarious liability for the acts and omissions of Sossan. Hospital further has institutional liability in its own right for its failures, acts and omissions administratively and in the care provided to Plaintiff by its employees and agents.

4. Defendant, Reconstructive Spinal Surgery and Orthopedic Surgery, P.C., was at all times material hereto, a dissolved New York Professional Corporation, registered in the State of Nebraska and organized for the purpose of providing medical services and at all times material had under its control and direction as its employee and agent Defendant, Sossan, who was acting within the scope of his employment and agency, thus subjecting Reconstructive Spinal Surgery and Orthopedic Surgery, P.C. to vicarious liability for the acts and omissions of Sossan.

5. The acts that gave rise to this Complaint occurred in Madison County, Nebraska and Yankton County, South Dakota.

GENERAL ALLEGATIONS

6. On or about March 21, 2011, Plaintiff suffered a lifting injury to her back and was admitted as an inpatient at Avera Sacred Heart Hospital where she was seen by Sossan although she had no prior physician/patient relationship with Sossan.

7. During Plaintiff's first encounter with Sossan and while Plaintiff was in severe pain, Sossan advised Plaintiff that she absolutely required a series of surgeries for her lifting injury, including spine surgery from levels L3 to S1 and both sacroiliac joints.

8. During Plaintiff's first encounter with Sossan, he advised Plaintiff that despite her fear of back surgery, if she would permit him to perform the proposed spine surgeries she would be 100% pain free.

9. During Plaintiff's first encounter with Sossan, and as further enticement, Sossan advised Plaintiff that he had recently performed the same surgical procedures on a construction worker who then returned to work within a very short time without any pain and that Plaintiff would achieve the same results with Sossan's proposed surgeries.

10. Sossan advised Plaintiff that although the surgeries were absolutely necessary he would first have to "go through

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the motions" of performing injections and radiofrequency for the sole purpose of securing approval for spinal surgeries.

11. At no time did Sossan offer Plaintiff any conservative measures or alternative therapies to address Plaintiff's back symptoms.

12. At no time did Sossan explain the medical necessity or lack thereof for the spine surgeries, the likelihood that Plaintiff would actually benefit from the spine surgeries, that the lifting injury symptoms may resolve without the surgeries or explain the risks of any spine surgeries, specifically that fusion surgery would likely cause additional issues at adjacent vertebral levels and that Plaintiff may have continuing or worsening back symptoms.

13. Following Plaintiff's discharge from Avera Sacred Heart on March 24, 2011, Plaintiff's condition began to improve without treatment.

14. On or about April 1, 2011, Sossan performed injections on plaintiff at Hospital and Plaintiff's condition continued to improve such that Plaintiff was able to participate in family outings and vacation without limitations.

15. On or about April 29, 2011, Sossan performed radiofrequency ablation on Plaintiff at Hospital and Plaintiff's condition had improved to pre-injury status and Plaintiff was doing her regular activities including carrying her laundry basket up and down the basement stairs and maintaining her lifestyle with anti-inflammatory and pain medications.

16. Prior to meeting Sossan, Plaintiff had never been a candidate for spinal surgery, did not want spinal surgery and feared having such a surgery.

17. Despite Plaintiff's marked improvement and return to pre-injury status, Sossan convinced Plaintiff, by false representations of absolute necessity and being completely pain free, to undergo the first extensive fusion surgery with an anterior approach from L-4 to S-1, on or about May 10, 2011, at Hospital.

18. When Plaintiff asked Sossan why he was just doing L-4 to S-1 when he had previously stated that it was absolutely necessary to do L-3 to S-1 and the sacroiliac joints, Sossan explained that it was too dangerous to leave a patient on the surgery table for that length of time and the other areas would have to be addressed in separate procedures.

19. In fact, Sossan knew that three level fusions were rarely indicated and Hospital had advised Sossan that he would not be allowed to proceed with three level fusions at Hospital.

20. On or about May 10, 2011, Sossan assisted by Kynan C. Trail, M.D. (Trail) a co-owner/shareholder of Hospital with Sossan, performed unnecessary spinal fusion surgery on Plaintiff at Hospital including anterior incision and fusion at levels L-4 and L-5 with cage placement resulting in Plaintiff's hospitalization at Hospital through May 15, 2011.

21. At no time did Trail or Sossan inform Plaintiff that they were both shareholders of Hospital and by recommending surgical procedures, not only stood to gain financially from performance of the surgery but also from the profit in Plaintiff's use of Hospital's surgical suite, staff, equipment and goods and Plaintiff's extended post-operative stay at Hospital.

22. At no time did Trail or Sossan inform Plaintiff of the medical necessity of the surgery, the likely and realistic outcomes of the surgery or the risks of the procedure and most specifically that they had recently experienced severe complications in another patient from anterior surgery.

23. At no time did Trail or Sossan inform Plaintiff that the anterior spinal surgery would likely result in additional symptoms at adjacent levels or that Plaintiff may have continuing or worsening symptoms.

24. On or about May 25, 2011, Sossan performed additional unnecessary spinal fusion surgery on Plaintiff at Hospital including posterior incision and fusion at levels L-4 and L-5 with instrumentation resulting in Plaintiff's hospitalization at Hospital through May 28, 2011.

25. On or about June 29, 2011, Sossan performed unnecessary bilateral sacroiliac joint injections on Plaintiff at Hospital.

26. On or about October 24, 2011, Sossan performed additional unnecessary spinal surgery on Plaintiff at Hospital including posterior exploration with total laminectomy and bilateral facetectomy and transfacet and far lateral discectomy and neural foramotomy with bilateral L-4 to S-1 internal neurolyses and release of adhesions with fluoroscopic guidance resulting in Plaintiff's hospitalization at Hospital through October 26, 2011.

27. On or about January 6, 2012, Sossan performed unnecessary S1 or S-3 bilateral Dorsal Primary Rami Medial Branch Nerve Radiofrequency Ablation on Plaintiff at Hospital.

28. On or about February 3, 2012, Sossan performed addi-

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tionally unnecessary spinal surgery on Plaintiff at Hospital including left sacroiliac joint fusion with implants resulting in Plaintiff's hospitalization at Hospital through February 4, 2012.

29. Sossan advised Plaintiff that she would need to return to have the right sacroiliac joint fused in the near future.

30. During Plaintiff's hospitalization at Hospital, Plaintiff was given morphine by agents by Hospital despite her documented allergy to morphine which resulted in a severe allergic reaction.

31. Following Plaintiff's February 3, 2012 procedure, Sossan, who had already lost surgical privileges at other hospitals, was finally banned from performing any spinal surgeries at Hospital.

32. Sossan failed to tell Plaintiff the truth about his status but rather continued scheduling unnecessary appointments with Plaintiff to continue to bill Plaintiff and to mislead Plaintiff to prevent her from seeing another spinal surgeon.

33. Plaintiff has been unable to obtain her medical records from Sossan and has not received a complete medical record from Hospital who indicated to Plaintiff that it did not even have all the operative reports relating to Plaintiff's surgeries.

34. On one of the visits following the February 3, 2012 surgery, Sossan scheduled Plaintiff to meet him at the offices of Don Swift, M.D. another co-owner/shareholder of Hospital at which time Sossan did not have any of Plaintiff's medical records.

35. At the appointment at Dr. Swift's office, Sossan complained that he was being held back by other area physicians who had "ancient" ideas and practices and did not appreciate his modern approaches to spine surgery and that the actions of other doctors were interfering with Plaintiff's treatment.

36. At the appointment at Dr. Swift's office, Sossan advised Plaintiff that the real reason for all of Plaintiff's back problems was that Plaintiff was overweight and she did not need any of the additional surgeries Sossan originally described.

37. At an October, 2012 appointment, Sossan advised Plaintiff that she was fine and did not require any additional surgery yet Sossan ordered an unnecessary MRI for Plaintiff with a plan to review the MRI with Plaintiff at a

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subsequent appointment.

38. Following the October, 2012, MRI, Plaintiff contacted Sossan's office as directed by Sossan but his office was closed and Sossan could not be reached.

39. However, Plaintiff received a bill from Sossan for a follow-up appointment that never occurred.

40. Sossan was convicted of felony burglary in 1983 for burglarizing the St. Petersburg Junior College science department to steal answers to a biology test under the name Alan A. Sossan and remained on felony probation until 1987.

41. Thereafter, Sossan began changing his name, first to Allen A. Sossan and then to his current name of Allen A. Sossan.

42. In 2004, Sossan failed to advise the Nebraska medical board of his true identity, failed to disclose his 1983 felony, failed to disclose his probation status, failed to report a prior malpractice claim and committed the act of perjury in signing a false and misleading application for licensing.

43. On information and belief, Sossan committed similar acts of perjury in making application to other medical boards including South Dakota.

44. Hospital failed to properly investigate Sossan's history of improper acts and perjurious conduct and loss of privileges at prior hospitals and negligently provided Sossan with privileges and access to patients such as Plaintiff and further allowed Sossan to exert influence and control at Hospital in the capacity of shareholder.

45. By January, 2012, Hospital knew or should have known that Sossan had been engaged in the practice of performing unnecessary surgeries, was being criticized by other reputable spine surgeons for improper surgeries and was having or had his privilege revoked by other hospitals.

46. Hospital continued to allow Sossan to perform surgeries to reap the financial benefits from the high cost of spinal surgery performed by Sossan until such time that even Hospital forced Sossan to give up his privileges and financial interest in Hospital but not until Sossan completed additional unnecessary surgery on Plaintiff.

47. Plaintiff would not have allowed any treatment or surgery by Sossan, Trail and Hospital had she been made aware of Sossan's history of improper conduct and lying on applications to become licensed and privileged;

CROSSWORD

By THOMAS JOSEPH

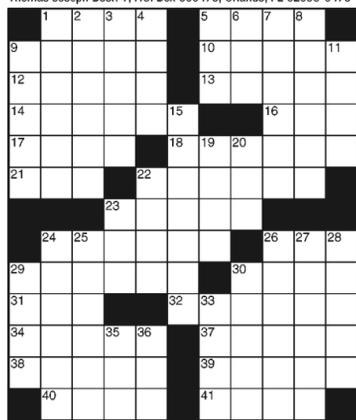
- ACROSS**
- 1 Refer to lamb
 - 5 Mexican peninsula
 - 9 Penalized
 - 10 Blow one's top
 - 12 Plain silly
 - 13 Musical pace
 - 14 Stand up for
 - 16 Writing tool
 - 17 Give off
 - 18 Diner activity
 - 21 Indulgent
 - 22 Corsica or Cuba
 - 23 Indy auto
 - 24 Wise sayings
 - 26 Filming site
 - 29 Trample
 - 30 Royal address
 - 31 Catchall abbr.
 - 32 Rely
 - 34 Diner offerings
 - 37 Gave medicine to
 - 38 Nepal neighbor
 - 39 Pretentiously designed
 - 40 Like ocean trenches
- DOWN**
- 1 Films
 - 2 Stuck, figuratively
 - 3 Basic belief
 - 4 Genesis site
 - 5 Wager
 - 6 "— we there yet?"
 - 7 Get involved eagerly
 - 8 Tack on
 - 9 Raul Castro's brother
 - 11 Chinese secret society
 - 15 Go down
 - 19 Pub pints way
 - 20 Road goo
 - 22 Othello's betrayer
 - 23 Eminem's music
 - 24 Go to part
 - 25 Century
 - 26 Midday break
 - 27 Writer Hemingway way
 - 28 Lacy nightwear
 - 29 Convoy truck
 - 30 Fern source
 - 33 Dutch cheese
 - 35 Tell tales
 - 36 Easy victim



Saturday's answer

- 15 Go down
- 19 Pub pints way
- 20 Road goo
- 22 Othello's betrayer
- 23 Eminem's music
- 24 Go to part
- 25 Century
- 26 Midday break
- 27 Writer Hemingway way
- 28 Lacy nightwear
- 29 Convoy truck
- 30 Fern source
- 33 Dutch cheese
- 35 Tell tales
- 36 Easy victim

NEW CROSSWORD BOOK! Send \$4.75 (check/m.o.) to Thomas Joseph Book 1, P.O. Box 536475, Orlando, FL 32853-6475



A XYDLBAA XR is LONGFELLOW

One letter stands for another. In this sample, A is used for the three L's, X for the two O's, etc. Single letters, apostrophes, the length and formation of the words are all hints. Each day the code letters are different.

12-30 CRYPTOQUOTE

DTX EDDM RFNSKXTZ LU CDGZW
H ZWDFUHTN WHUZV EDFTUXMU.
Z WX ZWLTS ZD ND LU ZD
UFQQMV MLSWZ HTN TDZ
WXHZ. — CDDNGDC CLMUDT

Saturday's Cryptoquote: YOU SEE, GEORGE, YOU'VE REALLY HAD A WONDERFUL LIFE. DON'T YOU SEE WHAT A MISTAKE IT WOULD BE TO JUST THROW IT AWAY? — CLARENCE THE ANGEL ("IT'S A WONDERFUL LIFE")