

IN THE CIRCUIT COURT OF THE 16TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

Cynthia Brzana)
)
 Plaintiff)
 v.)
)
 Kathleen Kennedy,)
)
 Defendant)

**COMPLAINT FOR SLANDER PER SE, AND
FALSE LIGHT INVASION OF PRIVACY**

Now comes Cynthia Brzana, Plaintiff, with her complaint against the Defendant, Kathleen Kennedy, for False Light Privacy and Slander Per Se, and in support of her complaint states as follows:

Parties and Venue.

- 1) Defendant Kathleen Kennedy is a resident of Will County residing at 34780 South Wurtz Road, Wilmington, Illinois 60481
- 2) Plaintiff is a resident of Will County.
- 3) The claims in this case arose in Will County, Illinois.
- 4) Venue is proper in this court because the Defendant is a resident of this county and the claims arose here in Will County, Illinois.

Facts Common to Each Count.

- 5) On or about July 13, 2018, Defendant, Kathleen Kennedy began warning various persons that Plaintiff was a park harasser.
- 6) On or about August 8, 2018 Defendant publically accused plaintiff of being a pedophile. Specifically, Defendant stated "Cynthia Brzana was a pedophile." (hereinafter "Defendant's Statement") Plaintiff then requested that she be called if Cynthia Brzana is seen in the park.
- 7) Upon information and belief, Kathleen Kennedy, has undertaken a campaign to disparage the plaintiff to further the idea that the Plaintiff is a pedophile.
- 8) The statement of Kathleen Kennedy accusing Plaintiff of being a pedophile is false and wholly without any merit whatsoever.
- 9) The term "pedophile" is defined as a person having a psychiatric disorder in which they have an exclusive sexual attraction to children.
- 10) The term Pedophile was used to insinuate that the Plaintiff had sexual contact with children which is a crime in the state of Illinois.
- 11) Defendant's publication of the statements in a public park was wantonly conducted to infer that Plaintiff was prowling about public parks to engage children in sexual acts when in fact the inference is false

- 12) Upon information and belief, Defendant either directly or indirectly used social media to spread the idea that Plaintiff was a pedophile when in fact plaintiff is not a pedophile.
- 13) The statement made by Defendant was designed to harm the good reputation and credit of Plaintiff.
- 14) Plaintiff is a person of good credit and good character.
- 15) The false statement of Plaintiff referenced herein above cast Plaintiff in a false light.
- 16) Malice is the gist of the Complaint.

Count I False Light Invasion of Privacy

- 17) Plaintiff restates paragraphs 1-16 in this first count as if fully restated herein.
- 18) The Statement of Defendant that Plaintiff was a pedophile was false,
- 19) The statement of defendant that plaintiff was a pedophile is offensive.
- 20) Any reasonable person would find a false statement about a person being a pedophile as offensive.
- 21) Defendant widely disseminated the idea that plaintiff was a pedophile.
- 22) Being labeled a Pedophile is highly offensive to a reasonable person.

23) Defendant encouraged members of the public to drive to the home of Plaintiff to encourage the public to harass plaintiff and to interfere with the Plaintiff's right to be left alone.

24) As a direct and proximate cause of being called a Pedophile and the encouragement of the Defendant, numerous individuals have now been traversing the road in front of Plaintiff's home that had otherwise been sparse.

Wherefore, Plaintiff prays that this Court enter the following relief:

A) Enter Judgment against Defendant, Kathleen Kennedy in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause.

B) For such other and further relief as this court deems just and equitable.

Count II Slander Per Se

25) Plaintiff restates the paragraphs 1-16 as if fully set forth herein.

26) Plaintiff published the statement that Plaintiff was a Pedophile to Cyndye Adams on or about August 8, 2018.

27) Defendant's statement that Plaintiff was a pedophile was false.

28) Defendant's statement was knowingly made or made with the wanton disregard of the truth.

- 29) Defendant's statement was not privileged.
- 30) Defendant's statement was designed to harm the reputation of the Plaintiff.
- 31) Defendant did in fact harm the reputation of the Plaintiff.

Wherefore, Plaintiff prays that this Court enter the following relief:

- A) Enter Judgment against Defendant, Kathleen Kennedy in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause.
- B) For such other and further relief as this court deems just and equitable.

/s/Robert Hanlon
Cynthia Brzana, By Her
attorney, Robert Hanlon

Robert T. Hanlon
Law Offices of Robert T. Hanlon
& Associates P.C.
131 East Calhoun Street
Woodstock, Illinois 60098