

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLIOIS

ROBERT DORMAN )  
PLAINTIFF )  
VS ) Case No. 2020L 001102  
)  
LISA CIAMPOLI ) JURY TRIAL DEMANDED  
DEFENDANT )

**COMPLAINT**

NOW COMES PLAINTIFF, ROBERT DORMAN, by his attorney, Richard Bullock, and for his complaint against Defendant, LISA CIAMPOLI, states as follows:

1. Plaintiff, Robert Dorman, is a resident of Madison County, Illinois. And was, at the time of the alleged statements, employed as the Madison County Information Technology (IT) director.
2. Defendant, Lisa Ciampoli, is a resident of Madison County, Illinois, and at the time of the alleged statements, was an elected official, associated with the Republican Party.
3. On January 4<sup>th</sup>, 2018, the Defendant made a statement to Detective Jeffrey Donahey of the Granite City Police Department with the Madison County Public Corruption Task Force Commanded by the Madison County Sherriff's Department which resulted in Detective Donahey filing a sworn affidavit which was unsealed on the 7<sup>th</sup> day of April, 2020 which stated, inter alia:  
"Lisa Ciampoli provided information surrounding improper activity when she filed petitions for precinct committee person while at the front desk of the County Clerk's office. She indicated that seconds after she arrived, an individual by the name of Robert Dorman confronted her and interfered with her filing of the petition ... During her encounter with Dorman, Dorman tried to swipe the paperwork out of her hand.
4. The statement made by the Defendant to Detective Donahey was false and defamatory. Video surveillance of the county clerk's office establishes that the alleged incident never happened.
5. As a result of Defendant's false and defamatory statement and the subsequent affidavit filed by Detective Donahey, a criminal investigation of the Plaintiff ensued, resulting in the Plaintiff's loss of employment and irreparable damage to his professional reputation.
6. The criminal investigation precipitated by the Defendant's false and defamatory statement resulted in no arrests and no indictments, and the Plaintiff was completely exonerated. Nonetheless, the Plaintiff lost his job and his professional reputation was damaged.

WHEREFORE, Plaintiff prays that judgement be entered against the Defendant for actual and punitive damages, in excess of \$50,000.00, caused by Defendant's false statement to Detective Donahey, and to deter the Defendant and others from similar behavior in the future.

Dated this 4<sup>th</sup> day of August, 2020.

ROBERT DORMAN, Plaintiff

TOWNE SQUARE LEGAL ADVOCATES LLC

By /S/ Richard Bullock

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ATTORNEYS FOR ROBERT DORMAN