



their pay and in part directed their conduct and therefore Defendants are legally responsible for the conduct of said deputies under the doctrine of *respondeat superior*.

3. Defendants, by one or more of said agents and employees had direct knowledge of the plaintiffs' employment contract with Madison County, Illinois.

4. Defendants, by one or more of said agents and employees, intentionally and unjustifiably induced a breach of said employment contracts by specifically calling for the termination of each plaintiff's employment and by making false and unsupported accusations of improper conduct and in some cases alleged criminal misconduct.

6. As a direct and proximate result of their agents and employees making false accusations and calling for the termination of plaintiffs' employment, Defendants persuaded a number of members of the Madison County Board to vote for termination of the employment of both plaintiffs, and such employment of both plaintiffs was terminated by resolution of the Madison County Board on April 16, 2021, which resolution terminated said employment effective at a later date.

7. As a result of the termination of their employment, plaintiffs and each of them suffered damages in the form loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

8. As a result of the foregoing, the Defendants and each of them have become liable to the plaintiffs for the tortious interference with plaintiffs' employment contract with Madison County.

WHEREFORE, Plaintiffs move the court for judgment against Defendants for judgment in excess of Fifty Thousand Dollars (\$50,000.00) and costs of suit.

Plaintiffs, ROBERT DORMAN and DOUGLAS HULME

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**PLAINTIFFS DEMAND TRIAL BY JURY**

**COUNT TWO**

Plaintiffs, ROBERT DORMAN and DOUGLAS HULME, by G. Edward Moorman, attorney, for their complaint for whistleblower or retaliatory discharge against the Defendants and each of them, state:

1. At all relevant times herein, the plaintiffs and each of them had a valid and enforceable employment contract with Madison County, Illinois, an Illinois municipal corporation.

2. The conduct complained of herein was committed by Madison County deputy sheriffs who were members of a public corruption task force which was made up of sheriff'S deputies employed by Madison County but who also were agents and employees of the defendants herein, each of which contributed to their pay and in part directed their conduct and therefore Defendants are legally responsible for the conduct of said deputies under the doctrine of *respondeat superior*.

3. Defendants, by one or more of said agents and employees had direct knowledge of the plaintiffs' employment contract with Madison County, Illinois.

4. Defendants, by one or more of said agents and employees, intentionally and unjustifiably induced A termination of each plaintiff's employment by making false and unsupported accusations of improper conduct and in some cases alleged criminal misconduct.

5. As a direct and proximate result of their agents and employees making false accusations and calling for the

termination of plaintiffs' employment, Defendants persuaded a number of members of the Madison County Board to vote for termination of the employment of both plaintiffs, and such employment of both plaintiffs was terminated by resolution of the Madison County Board on April 16, 2021, which resolution terminated said employment effective at a later date.

6. As a result of the termination of their employment, plaintiffs and each of them suffered damages in the form loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

7. The basis of the termination of Plaintiffs' employment was the fact that Plaintiffs had discovered improper and/or illegal conduct on the part of various Madison County officials, a basis which is improper as a whistleblower or retaliatory discharge of the Plaintiffs.

8. As a result of the foregoing, the Defendants and each of them have become liable to the plaintiffs for the whistleblower or retaliatory discharge of the Plaintiffs.

WHEREFORE, Plaintiffs move the court for judgment against Defendants for judgment in excess of Fifty Thousand Dollars (\$50,000.00) and costs of suit.

Plaintiffs, ROBERT DORMAN and DOUGLAS HULME

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