

**CIRCUIT COURT OF ILLINOIS
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY**

☒ Independent
☐ Criminal
☐ Juvenile

ROBERT HANLON (54)

Petitioner's Name (Person completing form)

Name(s) of other protected parties

Check if filing on behalf of:

☐ a minor child, or ☐ an adult who because of age, disability, health, or inaccessibility cannot file the petition (list name(s) below)

ROBERT HANLON

VS.

JOHN NORTON

Case # 2021OP000680

(to be completed by Court)

Ref Case#

Respondent's Name (Person you want protection from)

**VERIFIED PETITION STALKING NO CONTACT ORDER
PETITIONER INFORMATION**

Name:

Address:

(Street/ P. O. Box)

(City)

IL

(State)

60098

(Zip)

Other protected persons (persons to be included in the Stalking No Contact Order), in addition to the Petitioner are:

Name:

Address:

(Street/ P. O. Box)

(City)

(State)

(Zip)

FILED

APR 16 2021 10:26 AM

Andrea Lynn Chastain

CLERK OF THE
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY

RESPONDENT INFORMATION

Name : JOHN NORTON **DOB :** _____

Sex : ☒ Male ☐ Female **Race:** WHITE **Height:** 6'1" **Weight:** 150

Hair Color: BROWN **Eye Color:** BLUE **Social Security#:** _____

Driver's License #: _____ **License Plate #:** _____

Driver's License State: IL **License Plate State:** IL

Other Numeric Identifier: _____ **Description:** SKINNY DESHEVELLED WHITE MALE
(number - optional) (e.g. passport #, military serial #, or other)

☒ **Home Address:** [REDACTED] DRIVE WILMINGTON IL 60481
(Street/ P. O. Box) (City) (State) (Zip)

Name of Workplace: _____ **Work Hours:** _____

☐ **Work Address:** _____
(Street/ P. O. Box) (City) (State) (Zip)

Distinguishing Physical Features: _____

- ☐ **Respondent's address is unknown. Service by publication is requested (Section 2-206 (a) of the Code of Civil Procedure). Reasonable efforts to accomplish actual service must be shown by evidence or affidavit.(740 ILCS 21/60(c))**

Respondent may be:

- ☒ considered armed and/or dangerous
- ☐ suicidal
- ☐ considered armed, dangerous and suicidal

I am requesting a Stalking No Contact Order because on or about the following occurred : (Be specific as to dates, events and location(s) and describe at least 2 incidents)

Date: 10/24/2019 **Location:** WILL COUNTY COURTHOUSE

Description:

PETITIONER IS AN ATTORNEY THAT HAD OBTAINED AN ORDER OF PROTECTION FOR A CLIENT AGAINST THE RESPONDENT. CASE #2019 OP 1740. PRIOR TO APPEARING IN COURT, JOHN NORTON STATED TO ME IN THE HALLWAY "YOU'RE GONNA GET IT AFTER THIS CASE IS OVER".

Date: 9/9/2020 **Location:** WILMINGTON ILLINOIS

Description:

JOHN NORTON DRAFTED AN AFFIDAVIT AND FORGED HIS DAUGHTERS SIGNATURE ON THE AFFIDAVIT. JOHN NORTON INCLUDED ALLEGATIONS IN THE FORGED AFFIDAVIT THAT WERE NOT TRUE INCLUDING ALEDGED MISCONDUCT ON THE PART OF ATTORNEY HANLON. HE THEN CAUSED THE AFFIDAVIT TO BE DELIVERED TO MATTHEW DICIANNI WHO FILED IT WITH THE COURT (NOW THE SUBJECT OF A SANCTIONS MOTION FOR FILING A FORGED AFFIDAVIT) AT THAT TIME JOHN NORTON BEGAN POSTING STATEMENTS ON AN INTERNET PAGE ALLEGING PETITIONER ENGAGED IN CRIMINAL CONDUCT AND THAT PETITIONER WAS GOING TO BE INDICTED BY A FEDERAL GRAND JURY.

Date: 2/28/21 **Location:** E-MAIL

Description:

AFTER JOHN NORTON FORGED HIS DAUGHTERS AFFIDAVIT HE SENT PETITIONER AN E-MAIL WHICH READ: "NICE TRY SENDING A BLONDE, WEARING NO MASK OR PPE, TRYING TO GET IN MYFACE, WHILE ATTEMPTING TO GIVE ME FORGED PAPERS AND TRYING TO MURDER ME WITH A BIOLOGICAL WEAPON (COVID-19). NEXT TIME SEND A REDHEAD, SHE MIGHT GET LUCKY!:-)" PETITIONER HAS NEVER SENT ANY PERSON TO ATTEMPT TO MURDER JOHN NORTON NOR HAS PETITIONER

GIVEN JOHN NORTON FORGED PAPERS. PETITIONER HAS NO KNOWLEDGE OF ANY "BLONDE" ACTING ON HIS BEHALF.

Date: 3/3/21 Location: RECIEPT OF A SEXUAL TOY

Description:

I RECIEVED A PACKAGE CONTAINING AN DILDO. THE PACKAGE WAS POSTMARKED FROM WILMINGTON, IL AND HAD A NOTE THAT READ NNNN. JOHN NORTON HAS SIGNED HIS E-MAILS WITH NNNN

Date: 4/12/2021 Location: CONTINUED UNWANTED E-MAIL

Description:

ON 4/12/21 I EXPRESSLY TOLD JOHN NORTON . "IM GOING TO MAKE THIS REALLY CLEAR, EVEN FOR YOU. UNLESS YOU HAVE A COMMUNICATION SPECIFICALLY RELATED TO A CASE THAT I HAVE AN APPEARANCE ON FILE AND IT IS A PLEADING OR OTHER CORRESPONDENCE REQUIRED FOR SERVICE, I DO NOT WISH TO HEAR FROM YOU. I WILL CONSIDER YOUR E-MAILS, TELEPHONE CALLS OR ANYTHING THAT IS NOT A PLEADING OR DISCOVERY IN A PENDING LAWSUIT, IN A CASE I HAVE AN APPEARANCE ON FILE, TO BE HARASSMENT AND INTENDED FOR THAT PURPOSE. I WILL FURTHER EXERCISE MY RIGHTS UNDER APPLICABLE LAW IF YOU CONTINUE WITH YOUR CHILDISH AND FOOLISH BEHAVIOR. FRANKLY, IN ALL MY YEARS I HAVE YET TO ENCOUNTER ANYONE AS FOOLISH AS YOU. YOU APPARENTLY ARE TOO IGNORANT, FOOLISH OR JUST PLAIN STUPID TO UNDERSTAND THAT YOUR BEHAVIOR IS ACTIONABLE. WHEN IT COMES TO MY RIGHTS I WILL EXERCISE THEM WITH A VENGEANCE. SO TO BE CLEAR, I DO NOT WISH TO HAVE ANY COMMUNICATION WITH YOU EXCEPT AS REQUIRED BY ANY APPEARANCE ON FILE. AS TO YOUR PROPOSED UNFILED MOTION, PLEASE INCLUDE NOT ONLY YOUR MORONIC E-MAIL, BUT THIS RESPONSE AS WELL. " THEREAFTER JOHN NORTON SENT TO ME THE FOLLOWING E-MAIL MESSAGE AT 4/12/21 AT 3:49 PM: HEY BOBBY, YOU ARE THE FIRST LAWYER THAT I EVER MET THAT WAS UNPROFESSIONAL IN E-MAILS, PHONE CALLS AND WHEN NOBODY IS LOOKING. MANY AGREE THAT YOU MAKE HOLLOW THREATS AND PLAY DIRTY TRICKS, SOME OF WHICH YOU GOT CAUGHT DOING, NOTE IN THE CC LINE WHO ALSO GETS YOUR E-MAILS. IT'S THE BCC LINE THAT YOU CAN'T SEE IS WHAT SHOULD KEEP YOU UP AT NIGHT. NNNN AGAIN I TOLD MR. NORTON: "MR. NORTON: I MADE MYSELF CLEAR THAT I DO NOT WISH TO HEAR FROM YOU. DO NOT E-MAIL ME EXCEPT TO DELIVER PLEADINGS OR LEGAL NOTICES. " IN RESPONSE TO THAT E-MAIL JOHN NORTON SENT AN E-MAIL THAT READS AS FOLLOWS: HEY BOBBY! IT'S TWO YEARS AFTER THE DATE OF HER CONVICTION. I ALREADY ASKED AROUND. :) TRY, TRY, TRY AGAIN....LMAO NNNN AT 7:14PM JOHN NORTON THEN SENT ME AN E-MAIL THAT READS: MY MOTION I AM FILING WILL RESTRICT YOU TO ONLY SENT ME DOCUMENTATION VIA USPS MAIL. IF YOU HAVEN'T NOTICED ALREADY, I HAVE FILED AN ELECTRONIC EXEMPTION WITH THE COURT FOR THE LAST 9 MONTHS. I HAVE TWO LAW FIRMS THAT GAVE ME THE LEGAL BASIS TO DO THIS. BESIDE...YOU WANT TO DISRESPECT ME, THEN I RETURN THE FAVOR...LOL NNNN JOHN NORTON COPIED BONNIE KUROWSKI, MATTHEW DICIANNI AND MARIO CARLASARE.

Date: 4/13/2021 Location: TELEPHONE CALL

Description:

I RECIEVED A TELEPHONE CALL FROM JOHN NORTON AFTER I TOLD HIM THAT I DID NOT WANT TO HEAR FROM HIM.

Date: 04/15/2021 Location: TELEPHONE

Description:

I RECEIVED A CALL FROM JOHN FROM A BLACKED NUMBER HE STARTED SCREAMING AT ME AND I TOLD HIM I DIDN'T WANT TO HEAR FROM HIM AND HUNG UP THE PHONE.

Venue is appropriate in this county because: ☐ the Petitioner resides here; ☒ the Respondent resides here;

☒ one or more acts of the alleged stalking occurred here (check all that apply).

REMEDIES SECTION (Section 80)

Pursuant to the Stalking No Contact Order Act, the Petitioner seeks the following remedies:

1. ☒ That prohibits the Respondent from threatening to commit or committing stalking personally or through a third party.
2. ☒ That the Respondent may not contact the Petitioner and/or other protected persons in any way, directly, indirectly or through third parties, including, but not limited to, phone, written notes, mail, email, or fax.
3. ☒ That the Respondent be ordered to stay at least 100 feet away from the Petitioner and/or other protected persons, and their residence, school, daycare, employment and any other specified place. That Respondent be prohibited from entering or remaining at the Petitioner's and/or other protected persons':
 - ☒ place of residence, located at [REDACTED] DODSTOCK, IL, 60098

- ☒ place(s) of employment, located at _____ OGDSTOCK, IL, 60098
- ☐ school(s) and / or daycare, located at _____
- ☐ Respondent is prohibited from attending this school.
- ☐ Respondent is ordered to accept a transfer, change of placement or change of program, specifically _____
- ☐ Respondent is subject to the following restrictions within the school, specifically _____
- ☐ If Respondent is a minor, the Court orders that the parents, guardian or legal custodian take the following actions to ensure compliance with this Order, specifically _____
- ☐ and any of the following specified places, when Petitioner and/or other protected persons are present: _____

4. ☒ That the Respondent be prohibited from possessing a Firearms Owners Identification Card, or possessing or buying firearms.
5. ☒ Other injunctive relief as follows: _____
6. ☐ Petitioner requests that the Court order the following wireless telephone provider(s) to transfer the financial responsibility and the right to continue to use the telephone number(s) listed below to the Petitioner.

Name of the wireless service provider	Name of the account holder on the plan	US State in which the phone is registered	Billing telephone number of the account holder	The telephone number to be transferred

WHEREFORE, Petitioner moves the Court to grant the relief requested in this petition.

VERIFICATION

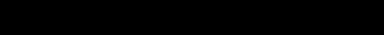
UNDER THE PENALTIES OF PERJURY AS PROVIDED BY LAW PURSUANT TO SECTION 1-109 OF THE CODE OF CIVIL PROCEDURE, THE UNDERSIGNED CERTIFIES THAT THE STATEMENTS SET FORTH IN THIS INSTRUMENT ARE TRUE AND CORRECT, EXCEPT AS TO MATTERS HEREIN STATED TO BE ON INFORMATION AND BELIEF AND AS TO SUCH MATTERS THE UNDERSIGNED CERTIFIES AS AFORESAID THAT THE UNDERSIGNED VERILY BELIEVES THE SAME TO BE TRUE.

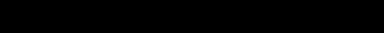


Signature of Petitioner

Petitioner's Attorney or Petitioner if not represented by an attorney

Name: ROBERT HANLON

Telephone: 

Address: 

City/State/Zip:  CK IL 60098

DEFINITION OF TERMS USED IN THIS PETITION

1. **Stalking No Contact Order:** an emergency order or plenary order granted under the Stalking No Contact Order Act (the Act), which includes any remedy authorized by 740 ILCS 21/80.
2. **Course of Conduct:** means two or more acts, including but not limited to acts in which a Respondent directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, or threatens a person, workplace, school, or place of worship, engages in other contact, or interferes with or damages a person's property or pet. A course of conduct may include contact via electronic communications. The incarceration of a person in penal institution who commits the course of conduct is not a bar to prosecution under this Section.
3. **Emotional distress:** means significant mental suffering, anxiety or alarm.
4. **Contact:** includes any contact with the victim, that is initiated or continued without the victim's consent, or that is in disregard of the victim's expressed desire that the contact be avoided or discontinued, including but not limited to being in the physical presence of the victim; appearing within the sight of the victim; approaching or confronting the victim in a public place or on private property; appearing at the workplace or residence of the victim; entering onto or remaining on property owned, leased, or occupied by the victim; placing an object on, or delivering an object to, property owned, leased, or occupied by the victim; or appearing at the prohibited workplace, school, or place of worship.
5. **Petitioner:** means any named Petitioner for the Stalking No Contact Order or any named victim of stalking on whose behalf the petition is brought. "Petitioner" includes an authorized agent of a place of employment, an authorized agent of a place of worship, or an authorized agent of a school.
6. **Reasonable Person:** means a person in the Petitioner's circumstances with the Petitioner's knowledge of the Respondent and the Respondent's prior acts.
7. **Stalking:** means engaging in a course of conduct directed at a specific person, and he or she knows or should know that this course of conduct would cause a reasonable person to fear for his or her safety, the safety of a workplace, school, or place of worship, or the safety of a third person or suffer emotional distress. Stalking does not include an exercise of the right to free speech or assembly that is otherwise lawful or picketing occurring at the workplace that is otherwise lawful and arises out of a bona fide labor dispute, including any controversy concerning wages, salaries, hours, working conditions or benefits, including health and welfare, sick leave, insurance, and pension or retirement provisions, the making or maintaining of collective bargaining agreements, and the terms to be included in those agreements.

**CIRCUIT COURT OF ILLINOIS
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY**

☒ Independent
☐ Criminal
☐ Juvenile

ROBERT HANLON (54)

Petitioner's Name (Person completing form)

Name(s) of other protected parties

Check if filing on behalf of:

☐ a minor child, or ☐ an adult who because of age, disability, health, or inaccessibility cannot file the petition (list name(s) below)

ROBERT HANLON

VS.

Case # 2021OP000680

(to be completed by Court)

JOHN NORTON

Ref Case#

Respondent's Name (Person you want protection from)

STALKING NO CONTACT ORDER

☒ **EMERGENCY STALKING NO CONTACT ORDER**

Issued on: Date: 04/16/2021 Time: 10:47 AM
Expires on: Date: 05/07/2021 Time: 05:00 PM

NOTICE

Hearing is set for: Date: 05/07/2021 Time: 09:15 AM at the
Will County Courthouse, Courtroom 1203, 100 W. Jefferson Street
Joliet, IL

☐ **PLENARY STALKING NO CONTACT ORDER**

(Requires Service of Process Under 740 ILCS 21/60)

Issued on: Date: _____ Time: _____

In effect until:

☐ Date: _____ Time: _____ (not to exceed 2 years).

☐ This Stalking No Contact Order is modified or vacated.

☐ Final disposition when a Bond Forfeiture Warrant has been issued.

☐ Two years following expiration of any sentence of supervision, conditional discharge, probation, periodic imprisonment, imprisonment or mandatory supervised release on _____

☐ Final judgment is rendered in Case No. _____

☐ Petitioner ☐ Respondent given a copy of this Order in open court on _____

FILED

APR 16 2021 10:47 AM

Andrea Lynn Chastain

CLERK OF THE
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY

PETITIONER INFORMATION

Name: ROBERT HANLON (54)

Address: [REDACTED] DCK IL 60098
(City) (State) (Zip)

Other protected persons (persons to be included in the Stalking No Contact Order), in addition to the Petitioner are :

Name: _____

Address: _____
(Street/ P. O. Box) (City) (State) (Zip)**RESPONDENT INFORMATION**

Name : JOHN NORTON DOB : _____

Sex : ☒ Male ☐ Female Race: WHITE Height: 6'1" Weight: 150

Hair Color: BROWN Eye Color: BLUE Social Security#: _____

Driver's License #: _____ License Plate #: _____

Driver's License State: IL License Plate State: IL

SKINNY DESHEVELLED WHITE MALE
TYPICALLY WEARING A BLACK OR BLUE T
SHIRT AND FILTHY JEANSOther Numeric Identifier: _____ Description: _____
(number - optional) (e.g. passport #, military serial #, or other)☒ Home Address [REDACTED] DRIVE WILMINGTON IL 60481
(Street/ P. O. Box) (City) (State) (Zip)

Name of Workplace: _____ Work Hours: _____

☐ Work Address: _____
(Street/ P. O. Box) (City) (State) (Zip)

Distinguishing Physical Features: _____

☐ Respondent is incarcerated at _____☐ Respondent's address is unknown**CAUTION INDICATOR**Respondent may be ☒ (A) Considered armed and/or dangerous ☐ (S) Suicidal ☐ (Y) Considered armed, dangerous and suicidal**NOTICE TO RESPONDENT**

ANY KNOWING VIOLATION OF A STALKING NO CONTACT ORDER IS A CLASS A MISDEMEANOR. ANY SECOND OR SUBSEQUENT VIOLATION IS A CLASS 4 FELONY.

NOTICE TO LAW ENFORCEMENT AGENCIES AND OFFICERS

Any law enforcement officer may make an arrest without warrant if the officer has probable cause to believe that the person has committed or is committing a violation of a stalking no contact order. 740 ILCS 21/130 (a)

FINDINGS [Emergency Order]

- ☒ The Court finds that good cause exists for granting the remedy regardless of prior service of process or notice upon the Respondent, because the harm which that remedy is intended to prevent would be likely to occur if Respondent were given any prior notice or greater notice than was given, of Petitioner's efforts to obtain judicial relief.

FINDINGS [Jurisdiction]

The court finds that Respondent:

- ☐ has been served with process and notice pursuant to statute.
- ☐ has entered an appearance in this case.
- ☐ is present in court, in person, and/or with counsel, _____
- ☐ is in default.
- ☐ has filed an answer.
- ☐ Finding that Petitioner has diligently attempted to complete service of process, has not been able to serve Respondent, and has given notice by publication (service completed 30 days after the first of three publication notices) Reasonable efforts to accomplish actual service has been shown by evidence or affidavit (740 ILCS 21/60 (c)).

FINDINGS [General]

In granting the following remedies, the Court has considered all relevant factors, including but not limited to the nature, severity and impact on the Petitioner of Respondent's two or more acts of following, monitoring, observing, surveilling, threatening, communicating or interfering or damaging property or pets of Petitioner, including Respondent's concealment of his/her location in order to evade service of process or notice, and the likelihood of danger of future acts of following, monitoring, observing, surveilling, threatening, communicating or interfering or damaging property or pets of the party to be protected.

The Court further finds that:

- ☒ Venue is proper (740 ILCS 21/55).
- ☒ Upon examination of the Verified Petition, Petitioner under oath, and other evidence, Petitioner is a victim of two or more acts of following, monitoring, observing, surveilling, threatening, communicating, or interfering or damaging to property or pets by Respondent.
- ☐ The victim is unable to bring this Petition on his/her own behalf due to age, health, disability, or inaccessibility (740 ILCS 21/15(b)).
- ☐ The parties stipulate to a factual basis for the issuance of a Stalking No Contact Order.

IT IS ORDERED THAT:

- ☒ Respondent is prohibited from threatening to commit or committing stalking personally or through third party.
- ☒ That the respondent may not contact the Petitioner and/or other protected persons in any way, directly, indirectly or through third parties, including, but not limited to, phone, written notes, mail, email, or fax.
- ☒ That the Respondent be ordered to stay at least 100 feet away from the petitioner, and Petitioner's residence, school, daycare, employment and any other specified place. That Respondent be prohibited from entering or remaining at the Petitioner's:
 - ☒ place of residence, located at _____ OCK,IL,60098
 - ☒ place(s) of employment, located _____ DDSTOCK,IL,60098
 - ☐ school(s) or/ and daycare, located at _____

- ☐ Respondent is prohibited from attending this school.
- ☐ Respondent is ordered to accept a transfer, change of placement or change of program, specifically _____
- ☐ Respondent is subject to the following restrictions within the school, specifically _____
- ☐ If Respondent is a minor, the Court orders that the parents, guardian or legal custodian take the following actions to ensure compliance with this Order, specifically _____
- ☐ and any of the following specified places, when Petitioner is present: _____

4. ☐ That the Respondent be prohibited from possessing a Firearms Owners Identification Card, or possessing or buying firearms.

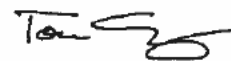
5. ☐ Other injunctive relief as follows: _____

6. ☐ The Circuit Clerk shall serve this order on the following wireless telephone provider(s) to transfer all financial responsibilities and the right to use the phone number(s) listed below to the petitioner.

Name of the wireless service provider	Name of the account holder on the plan	US State in which the phone is registered	Billing telephone number of the account holder	The telephone number to be transferred

If petitioner is requesting costs and/or attorney fees, petitioner shall file a motion and itemized bills and invoices within 30 days of this order.

This order can be extended upon notice filed in the office of the Clerk of this Court and a hearing held prior to the expiration of this Order. NOTE: To ensure adequate time for a hearing, it is recommended that Petitioner seek an extension at least 3 weeks prior to the expiration of this order.



JUDGE MARK CARNEY
TRAN#: IPO24593211047382371

I hereby certify that this is a true and correct copy of the original Order on file with the court.

Andrea Lynn Chasteen

Clerk of the Circuit Court of
WILL County, IL

Date: 04/16/2021

(seal of the Clerk of Circuit Court)

cc: ☐ Petitioner ☐ Respondent ☐ Counsel of Record ☐ Sheriff ☐ Advocate ☐ Jail ☐ S/A

DEFINITION OF TERMS USED IN THIS STALKING NO CONTACT ORDER

1. **Stalking No Contact Order:** an emergency order or plenary order granted under the Stalking No Contact Order Act (the Act), which includes any remedy authorized by 740 ILCS 21/80.
2. **Course of Conduct:** means two or more acts, including but not limited to acts in which a respondent directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, or threatens a person, workplace, school, or place of worship, engages in other contact, or interferes with or damages a person's property or pet. A course of conduct may include contact via electronic communications. The incarceration of a person in penal institution who commits the course of conduct is not a bar to prosecution under this Section.
3. **Emotional distress:** means significant mental suffering, anxiety or alarm.
4. **Contact:** includes any contact with the victim, that is initiated or continued without the victim's consent, or that is in disregard of the victim's expressed desire that the contact be avoided or discontinued, including but not limited to being in the physical presence of the victim; appearing within the sight of the victim; approaching or confronting the victim in a public place or on private property; appearing at the workplace or residence of the victim; entering onto or remaining on property owned, leased, or occupied by the victim; placing an object on, or delivering an object to, property owned, leased, or occupied by the victim; or appearing at the prohibited workplace, school, or place of worship.
5. **Petitioner:** means any named petitioner for the stalking no contact order or any named victim of stalking on whose behalf the petition is brought. "Petitioner" includes an authorized agent of a place of employment, an authorized agent of a place of worship, or an authorized agent of a school.
6. **Reasonable Person:** means a person in the petitioner's circumstances with the petitioner's knowledge of the respondent and the respondent's prior acts.
7. **Stalking:** means engaging in a course of conduct directed at a specific person, and he or she knows or should know that this course of conduct would cause a reasonable person to fear for his or her safety, the safety of a workplace, school, or place of worship, or the safety of a third person or suffer emotional distress. Stalking does not include an exercise of the right to free speech or assembly that is otherwise lawful or picketing occurring at the workplace that is otherwise lawful and arises out of a bona fide labor dispute, including any controversy concerning wages, salaries, hours, working conditions or benefits, including health and welfare, sick leave, insurance, and pension or retirement provisions, the making or maintaining of collective bargaining agreements, and the terms to be included in those agreements.

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS**

ROBERT HANLON
Petitioner

vs

CASE NUMBER 2021OP000680

JOHN NORTON
[REDACTED] DRIVE
WILMINGTON, IL 60481
Respondent

SUMMONS - Stalking No Contact Order

To each respondent:

You are summoned and required to file an answer in this cause, or otherwise file your appearance in the Office of the Clerk of this Court, ROOM 141, located at the WILL COUNTY COURTHOUSE, 100 W JEFFERSON STREET, JOLIET, IL., within (7) days after service of this summons, not counting the day of service.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp>, or talk with your local circuit clerk's office.

IF YOU FAIL TO DO SO, A DEFAULT JUDGMENT OR PROTECTIVE ORDER MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE PETITION.

HEARING DATE: Friday, May 7, 2021 **TIME:** 9:15 am **COURTROOM:** 603
ADDRESS: WILL COUNTY COURTHOUSE, 100 W JEFFERSON STREET, JOLIET, IL 60432

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than thirty days after its date.



052731785-02

WITNESS April 16, 2021

/S/ANDREA LYNN CHASTEEN/LLCS

Clerk of the Circuit Court

Petitioner's Attorney or Petitioner if not represented by an attorney

Name ROBERT HANLON

ARDC#

Firm Name

Address 131 EAST CALHOUN STREET,

City & Zip WOODSTOCK, IL 60098

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

SUMMONSI

Revised (02/17)

Will County Sheriff's Office | Affidavit of Service

Case Number: 21 OP 680

Paper Number: 2021-00002297

Plaintiff:

ROBERT HANLON

Defendant:

JOHN NORTON

Paper Description

Attempted Services

OP-STALKING

Issued: Friday, April 16, 2021

Expires: Friday, May 7, 2021

Payment:

Person To Be Served

JOHN NORTON

1834 ROBERTS ST

WILMINGTON, Illinois 60481

Special Notes:
SHANNY

56-5051
2/26/65

FILED
CLERK CIRCUIT COURT
WILL COUNTY, ILLINOIS
2 APR 22 PM 1:41

I certify that I have served the attached Civil Process on the person to be served as follows.

(A) ☒ Personal Service

By leaving a copy of the Summons/Complaint Rule Order Subpoena
Notice Judgment Order of Protection Summons/Petition for Order of
Protection Citation ☒ Civil/Stalking No Contact Order

(B) Substitute Service.

By leaving a copy of the Summons/Complaint Citation Notice Judgment
Order of Possession at the defendant's usual place of abode, with some person of
the family or person residing there, of the age of 13 years or upwards, and informing said
person of the contents. Also, a copy of the Civil Process was mailed to the defendant at
his/her usual place of abode on (Date Only)

(C) Service On

Corporation Company Business

By leaving a copy of the Summons/Complaint Citation Rule Order
Notice Judgment Subpoena with the registered agent or any officer, or agent
of the corporation, or partner or agent of the partnership.

(D) Other Service:

Certified Mail Posting

(E) The named defendant was not served:

Moved No Contact Returned by Attorney Expired Not Listed
No Such Address Deceased Other Reason
(See Remarks)

Person to Serve: JOHN E NORTON

Serving Address: [REDACTED] 56

Process Served On: JOHN E NORTON

Relationship: SELF

Sex M M/F Race W

Age Range: 56

This 19 day of April

20 21

Time: 1913

hours

Sheriff Mike Kelley by Baker 290

ID Number 2510

Remarks

Entered By: KS Date Entered Friday, April 16, 2021 11:21:26AM

Date Printed: Friday, April 16, 2021 10:23:42 AM

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

ROBERT HANLON

Petitioner

vs

CASE NUMBER 2021OP000680

JOHN NORTON
1834 ROBERT DRIVE
WILMINGTON, IL 60481
Respondent

SUMMONS - Stalking No Contact Order

To each respondent:

You are summoned and required to file an answer in this cause, or otherwise file your appearance in the Office of the Clerk of this Court, ROOM 141, located at the WILL COUNTY COURTHOUSE, 100 W JEFFERSON STREET, JOLIET, IL, within (7) days after service of this summons, not counting the day of service.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp>, or talk with your local circuit clerk's office.

IF YOU FAIL TO DO SO, A DEFAULT JUDGMENT OR PROTECTIVE ORDER MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE PETITION.

HEARING DATE: Friday, May 7, 2021 **TIME:** 9:15 am **COURTROOM:** 603
ADDRESS: WILL COUNTY COURTHOUSE, 100 W JEFFERSON STREET, JOLIET, IL 60432

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than thirty days after its date.



052731785-02

WITNESS April 16, 2021

/S/ANDREA LYNN CHASTEEN/LLCS

Clerk of the Circuit Court

Petitioner's Attorney or Petitioner if not represented by an attorney

Name ROBERT HANLON

ARDC#

Firm Name

Address STREET

City & Zip 098

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

SUMMONSI

Revised (02/17)

04/23/21 10:23:42 WLLH

**CIRCUIT COURT OF ILLINOIS
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY**

☒ Independent
☐ Criminal
☐ Juvenile

ROBERT HANLON (54)

Petitioner's Name (Person completing form)

Name(s) of other protected parties

Check if filing on behalf of:

☐ a minor child, or ☐ an adult who because of age, disability, health, or inaccessibility cannot file the petition (list name(s) below)

ROBERT HANLON

VS.

JOHN NORTON

Case # 2021OP000680

(to be completed by Court)

Ref Case# _____

Respondent's Name (Person you want protection from)

STALKING NO CONTACT ORDER

☒ **EMERGENCY STALKING NO CONTACT ORDER**

Issued on: Date: 04/16/2021 Time: 10:47 AM
Expires on: Date: 05/07/2021 Time: 05:00 PM

NOTICE

Hearing is set for: Date: 05/07/2021 Time: 09:15 AM at the
Will _____ County Courthouse, Courtroom 103, 100 W. Jefferson Street
Joliet _____, IL

☐ **PLENARY STALKING NO CONTACT ORDER**
(Requires Service of Process Under 740 ILCS 21/60)

Issued on: Date: _____ Time: _____
In effect until: _____ Time: _____ (not to exceed 2 years)
☐ Date: _____ Time: _____

☐ This Stalking No Contact Order is modified or vacated.

☐ Final disposition when a Bond Forfeiture Warrant has been issued.

☐ Two years following expiration of any sentence of supervision, conditional discharge, probation, periodic imprisonment, imprisonment or mandatory supervised release on _____

☐ Final judgment is rendered in Case No. _____

☐ Petitioner ☐ Respondent given a copy of this Order in open court on _____

FILED

APR 16 2021 10:47 AM

Andrea Lynn Chapman

CLERK OF THE
TWELFTH JUDICIAL CIRCUIT
WILL COUNTY

IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA, AND TIM GRANT)

Plaintiffs,)

v.)

Case No. 19 CH 1143

WESLEY TOWNSHIP AND WESLEY)
TOWNSHIP ROAD DISTRICT,)

Defendants.)

PETITION FOR RULE TO SHOW CAUSE
WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT

NOW COME PLAINTIFFS, CYNTHIA BRZANA AND TIM GRANT, by and through their attorney, ROBERT T. HANLON of the LAW OFFICES OF ROBERT T. HANLON & ASSOCIATES, pc, and for their Petition for Rule to Show Cause Why Defendants Wesley Township and Wesley Township Road District Should Not be Held in Contempt, herein state as follows:

I. **Introduction**

1. Defendants have filed with this court counter-claims alleging excessive FOIA requests were directed at the public bodies and alleged to this Court claims arising out of these purported excessive FOIA requests, even though excessive FOIA requests are not a cause of action. Moreover, Defendants have had over six months to respond to the discovery propounded upon the Defendants. Defendants ignored Plaintiffs' Discovery for over six months which required a motion to compel. After the filing of the motion to Compel, this court ordered Defendants to answer Plaintiffs discovery within 7 days. Defendant failed to comply with this Court's order. During the Months of March and

April Defendant's attorney represented to Plaintiff's counsel that the responses were out for signature. After the filing of the Motion to Compel, Defendants and have continued to ignore Plaintiffs' discovery and Defendants and have not complied with this court's order to provide the discovery answers to Plaintiffs' Interrogatories and Request to Produce.

2. Its actually this simple. Defendants allege that 50 FOIA requests were submitted to Defendants in a single weekend. Plaintiffs seek the requests (in essence the support for the allegation) and for some reason Defendants and Defendant's counsel cannot produce that which they are required to maintain as a matter of law. See Section 3.5(a) of the Illinois Freedom of Information Act and Rule 137.

3. Plaintiffs now seek a Rule to Show Cause as to why Defendants should not be held in contempt for Defendants' absolute failure to obey this Court's order of April 13, 2021 commanding them to respond to Defendants' discovery on or before April 20, 2021.

II. FACTUAL BACKGROUND SUPPORTING ISSUANCE OF A RULE TO SHOW CAUSE.

4. On or about September 14, 2020, Plaintiff served a first set of interrogatories and first request to produce documents upon Defendants (two public bodies).

5. Any record of the Defendants is a public record and is not "Top Secret."

6. Promise after promise pr respond and produce went unfulfilled!

7. On numerous occasions Defendants' counsel, Matthew DiCianni represented that the requests to produce and the interrogatories would be answered "shortly" or were "out for signature".

8. Defendant's written discovery answers were due on October 12, 2020.

9. Defendants failed to respond to Plaintiff's Interrogatories and Requests to Produce.

10. Between the time that Defendant's written discovery was served upon Plaintiff's

counsel, Defendant and Plaintiff's counsel have conducted numerous 201(k) conferences. None of which have resulted in any promise of any particular date or the production of any material. Counsel responsible for trial of the case after personal consultation and reasonable attempts to resolve differences have been unable to reach an accord or that opposing counsel made himself or herself unavailable for personal consultation or was unreasonable in attempts to resolve differences.

11. As of the date of the filing of this Motion, over six (6) months have elapsed since Plaintiff served Defendant's its discovery and Defendant refuses to produce any documents and has failed to provide a single answer to Plaintiff's interrogatories.

12. The material sought ought to have been in the possession of Defense Counsel at the time that Defenses counsel filed a counter-claim.

13. Plaintiff found it necessary to seek the aid of the court to resolve a discovery matter for which Defendants were ordered to answer the discovery within 10 days.

14. Despite this court's order (which was agreed to by Mr. DiCianni) commanding the Defendants to respond no later than April 20, 2020, Defendants continue with non-production of the records that support their purported counter-claims.

15. The refusal after more than six months to produce relevant documents is unconscionable.

16. Importantly, interrogatory #1 reads:

Identify by name of the FOIA requestor, and date of the FOIA request, and the documents requested in all FOIA requests made upon either Defendant in the relevant time period.

17. Interrogatory #1 is directly related to the counter-claim advanced by Defendant. The relevant time period was from 5/18/2018 (the date of plaintiffs' First FOIA Request) to the

present.

18. Plaintiff also sought any document identified by the Defendant in response to the interrogatories.

19. Plaintiff also sought copies of all outstanding FOIA requests. See Request #5.

20. Defendants counter-claim alleges a burden of responding to 50 FOIA requests in a single weekend. See Defendant's counter-claim in paragraph 4.

21. Plaintiffs also sought all documents that support any denial or a defense to claims raised to Plaintiffs Amended Complaint. Defendants alleged an affirmative defense that revolves around the idea that Plaintiff Brzana organized a campaign to overwhelm the township and the Road District with FOIA requests See Affirmative Defense #4.

22. Overwhelmingly, Defendants' affirmative defense claiming unclean hands discusses the purported campaign of FOIA requests and the Township being overwhelmed. These request ought to be readily available and would be responsive to the discovery request of last year. Nevertheless, Defendants have now embarked upon an endeavor to make unsupported claims and not produce any documents that support the claims made in the affirmative defenses and counterclaim.¹

14. Plaintiffs also sought all documents related to any communication with Sarah Norton after the Commencement of this lawsuit. (None have been produced.)

15. Defendant failed to raise any objections to Plaintiffs' Interrogatories or Request to Produce. As such, Plaintiff has waived any objections to Defendant's discovery at this very late time.

¹ Sarah Norton stated in her deposition that she received in excess of 130 FOIA requests in a single weekend. None have been produced.

III. Discovery of Facts and Documents are Necessary for Plaintiffs' Defense to Defendant's Specious Counter-claims

16. Pursuant to Illinois Supreme Court Rule 201(b), entitled "Scope of Discovery," it states in part, "Except as provided in these rules, a party may obtain by discovery full disclosure regarding any matter relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking the disclosure or of any other party "

Illinois Supreme Court Rule 201 (b).

17. Discovery in Illinois is broad where a party is not only entitled to discover information that is relevant to the pending action, but also entitled to discover information that may lead to the discovery of other admissible evidence. *Pickering v. Owens Corning Fiberglas Corporation*, 638 NE.2d 1127, 1139 (5th Dist. 1994). "

18. The material sought within Plaintiffs' written discovery is likely to lead to admissible evidence related to the allegations of the complaint and the counter-complaint. Specifically, Plaintiff seeks material associated with the purported "abuse of FOIA" referenced in the Counter-complaint, instances of non-compliance with the Freedom of Information Act. Within paragraph 4 of Defendants Counter-claim Defendants allege Defendant received over 50 FOIA requests in a single weekend. That allegation does not say who submitted the requests or provide as an Exhibit those purported FOIA requests. Accordingly, Plaintiff seeks copies of the actual FOIA requests that Defendant claims to have received in the relevant time period that somehow is the product of either Plaintiff.²

19. Because Matthew DiCianni, a licensed attorney, filed with this court a counter-claim with this infamous claim, he had a corresponding duty to ensure that the claim was well founded

² In response to a request to admit facts Defendants alleged it had no records of even plaintiff's requests. This will be addressed by separate motion.

in fact. See *Walsh v Capital Engineering*, (1st Dist.) 312 Ill. App. 3d 910. These documents ought to have been in Mr. DiCianni's possession at the time he filed his counter-claim. It is important to note that the relevance of the non-compliance with the Freedom of Information Act extends from the complaint³ itself and that Matthew DiCianni was on notice that Plaintiff was seeking this information before he even filed the counter-claim.

20. Certainly, Mr. DiCianni would have conducted his Rule 137 investigation before filing the counter-claim. In fact, any prudent attorney would have required the documentation before filing the counter-claim to ensure that he would be able to meet the minimum evidentiary burden for advancing his claims and because he was already on notice that Plaintiff wanted to ascertain which FOIA requests had been submitted to the Defendants and were not answered, it ought not take six months to locate the documents.

21. The bad faith associated with the conduct of Defendants in this case includes filing a forged affidavit and other misconduct including the spoliation of evidence. That is addressed in a separate motion. Moreover, as it relates to this motion, the bad faith of the Defendants extends to not answering the discovery requests and obfuscating access to the documents that purportedly support Defendant's counter-claims and what it has alleged is an affirmative defense to the claims of the plaintiff.

22. Nevertheless Defendants have not complied with this Court's order of April 13, 2020 commanding Defendants to respond to Plaintiff's discovery. No production and no answers have been delivered to Counsel.

³ And its amendments.

23. Discovery in Illinois is broad where a party is not only entitled to discover information that is relevant to the pending action, but also entitled to discover information that may lead to the discovery of other admissible evidence. *Pickering v. Owens Corning Fiberglas Corporation*, 638 NE.2d 1 127, 1 139 (5th Dist. 1994). "

IV. Specific Basis for Rule to Show Cause

24. The basis for the requested Rule to Show Cause is Plaintiffs violation of the order of April 13, 2021 commanding Defendant to respond to Plaintiffs' discovery by April 20, 2021.

25. Counsel responsible for trial of this case, after personal consultation and reasonable attempts to resolve differences have been unable to reach an accord or that opposing counsel made himself or herself unavailable for personal consultation or was unreasonable in attempts to resolve differences.

V. Prayer For Relief

WHEREFORE, Plaintiffs respectfully pray that this Court grant the following relief:

- A. Issue a Rule to Show Cause why Defendants should not be held in Contempt and in furtherance of that Rule to Show Cause, Grant to Defendants Summary judgment as a sanction for Defendant's non-compliance with this Court's discovery order;
- B. As an alternative to the prayer above in paragraph A, Issue an order to bar Plaintiff from introducing any documents into evidence that were within the scope of documents sought by Defendants in their discovery and not produced; and bar Defendants from introducing any testimony from any person not identified in response to Plaintiffs' discovery; and Bar Defendants from making any argument related to the scope of plaintiffs discovery.
- C. For an order of Contempt against each Defendant.
- D. For any such further relief as this Court deems just and equitable.

Respectfully submitted,

/s/ Robert T. Hanlon,

One of Plaintiffs' Attorneys

Robert T. Hanlon, ARDC #6286331
LAW OFFICES OF ROBERT T.
HANLON & ASSOCIATES, P.C.

Woodstock, IL 60098