

**CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

ROBERT DORMAN and DOUGLAS HULME) 2021L 000955
Plaintiffs)
vs.) 2021-L-
MADISON COUNTY, an Illinois)
Municipal Corporation)
David Vucich Official and Individual)
Chris Slusser, Official and Individual)
Thomas Gibbons, Official and Individual)
John D. Lakin, Official and Individual)
JF Electric and successor businesses)
Chris Slusser, Official and Individual)
Rick Faccin)
Ray Wesley)
Mike Walters)
Jamie Goggins)
Erica Harriss)
Chris Bethel)
Patrick McRea)
Jeff Connor)
Erick Decker)
Mike Parkinson)
Bob Daiber)
Jack Daugherty)
Tom McRea)
Jennifer Zoelzer)
William Mudge)
Jennifer Mudge)
Defendants)

COMPLAINT

Plaintiffs, by G. Edward Moorman, attorney, for their
Complaint against the Defendants and each of them, state:

COUNT ONE

1. The defendants include Madison County, Illinois, an Illinois Municipal Corporation, and numerous officials and employees thereof who are sued in both their individual names and, where relevant, in their official capacity.

2. At all relevant times herein, the plaintiffs were employees and officials of Madison County, Illinois, and later, their employment having been terminated, former employees and officials of Madison County, Illinois.

3. Beginning in approximately the year 2016, and continuing to the present date, all of the defendant participated in conspiratorial conduct tantamount to a civil conspiracy against the plaintiffs resulting in:

The termination of the plaintiffs' employment with Madison County, Illinois

The tortious interference with Plaintiffs' employment with Madison County, Illinois

The denial of a number of state and federal civil rights of the Plaintiffs.

The use by law enforcement defendants of a court ordered overhear which the plaintiffs are informed and believe was used improperly and read aloud contrary to law to other Defendants

prior to a Madison County Board meeting at which the Plaintiffs were discharged.

At the Madison County Board meeting at which Plaintiffs were discharged the Plaintiffs were denied the right to be informed of the charges against them, denied the right to confront their accusers, denied the right to cross-examine witnesses, denied the right to be represented by counsel, and a variety of other denials.

4. 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.

5. The conduct complained of herein was committed in whole or in in part by the Defendants and each of them both as active participants in the conduct complained of, as conspirators in the commission of such conduct, and to the present date engaging in efforts to destroy or make unavailable to Plaintiffs certain emails and other evidence of the conduct complained of.

6. Those defendants who are either sheriff or deputy sheriffs of Madison County were members of a public corruption task force created by Thomas Gibbons, then Madison County States Attorney.

7. Those defendants who were not active police officers in the conduct complained of nevertheless participated in conduct

designed to use aspects of the misconduct to terminate the defendants from their employment, thereby interfering with Plaintiffs' contract with Madison County.

8. All of the defendants either directly or indirectly , 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.

9. As a direct and proximate result of the false accusations and the calling for the termination of Plaintiffs' employment, or where relevant, the participation in the vote for termination of the employment of both plaintiffs, which employment was terminated by resolution of the Madison County Board on April 16, 2020, effective at a later date.

10. As a result of said active conduct or participation in the termination of the Plaintiffs, each Defendant has become liable to the Plaintiffs for the tortious interference with Plaintiffs' employment contract with Madison County and for other denial of the civil rights of the Plaintiffs.

11. The action of the Madison County Board in terminating the employment of the Plaintiffs was based on information, much of it false, which was obtained by improper and/or illegal

conduct on the part of various Madison County officials which information was a basis of termination of the Plaintiffs tantamount to whistleblower discharge or retaliatory discharge of the Plaintiffs.

12. The false and defamatory statements made by many of the Defendants and acted upon by other Defendants constitute the tort of False Light giving right to a cause of action by the Plaintiffs against the Defendants and each of them.

13. As a direct and proximate result of the misconduct of the defendants, the Plaintiffs lost their employment and benefits as an employee of Madison County, as well as suffered embarrassment, humiliation, and stigma.

WHEREFORE, Plaintiffs pray for judgment against Defendants and each of them and damages in a sum in excess of \$50,000.00.

PLAINTIFFS DEMAND TRIAL BY JURY

COUNT TWO

14. Plaintiffs restate paragraphs 1-13 of COUNT ONE.

16. Venue is proper in this court because it involves a contract with a public entity located in this county and most of the conduct complained of were committed in this county.

16. The misconduct of the defendants constitute multiple due process violations under 42 U.S.C. § 1983

WHEREFORE, Plaintiffs pray for judgment against Defendants and each of them and damages in a sum in excess of \$50,000.00.

PLAINTIFFS DEMAND TRIAL BY JURY

Plaintiffs, ROBERT DORMAN and DOUGLAS HULME

e-filed

By: /s/ G. Edward Moorman
G. Edward Moorman, Attorney #1953184
510 East Sixth Street
Alton IL 62002
618-465-0522 mobile 314-799-8908
FAX 618-465-5705
emoor@aol.com