

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BONNIE KUROWSKI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:21-cv-04363
	)	
JOHN KRAFT, KIRK ALLEN,	)	
ALYSSIA BENFORD, CYNTHIA BRZANA,	)	Judge Feinerman Presiding
SHERI GRIMMENGGA, KRISTINA WING,	)	
BECKY BECKER, AND EDGAR COUNTY	)	
WATCHDOGS, INC., an Illinois Corporation,	)	
	)	
Defendants.	)	

**LOCAL RULE 56.1 STATEMENT OF FACTS IN SUPPORT OF DEFENDANTS’  
MOTION FOR SUMMARY JUDGMENT**

NOW COME Defendants, JOHN KRAFT, KIRK ALLEN, ALYSSIA BENFORD, CYNTHIA BRZANA, SHERI GRIMMENGGA, KRISTINA WING, BECKY BECKER, AND EDGAR COUNTY WATCHDOGS, INC., an Illinois Corporation, (collectively the “Defendants”) by and through their attorney Robert T. Hanlon, with their Statement of Facts in support of Defendants’ Motion for Summary Judgment pursuant to Local Rule 56.1 and state as follows:

1. Plaintiff provided testimony in a separate federal lawsuit subject to cross examination and under oath. See select pages of Plaintiff’s Deposition Transcript taken February 16, 2022 and attached hereto as Exhibit A.
2. The gravamen of Plaintiff’s Amended Complaint for the False Light Invasion of Privacy count is that Plaintiff alleges being placed in a false light for being called a liar, alleged to have filed bankruptcy twice. See Plaintiff’s Amended Complaint (Document No. 5), paragraphs 30-31, and the Exhibits (Document No. 5-1); both documents are attached hereto as Exhibit B.
3. Plaintiff alleges that her purported injuries for which she claims she is entitled to relief are: A) lost employment at JHT (see Exhibit B, paragraphs 16 and 34); B)

the necessity to homeschool her child (see Plaintiff's Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1) attached hereto as Exhibit C, page 6); and C) loss of a "Top Secret" security clearance (see Exhibit C, page 5).

#### **LOSS OF EMPLOYMENT AT JHT**

4. Central to Plaintiff's claims is the allegation that Plaintiff suffered a loss of employment at JHT caused by "Defendants" without the specificity of identifying which Defendant purportedly caused Plaintiff to lose employment with JHT. See Exhibit B, paragraphs 16 and 34. Despite the allegation in Plaintiff's Amended Complaint (Exhibit B, paragraph 16) and Plaintiff's 26(a) disclosures claiming damages as a result of loss of employment at JHT (Exhibit C, page 5), Plaintiff testified that she lost her employment because of the conduct of Cornel Darden, who is not a party to this action. See Exhibit A, page 213.
5. Plaintiff testified that her loss of employment was caused by a third party as follows:

**Q So Cornel Darden contacted your employer?**

A Yes, you have the evidence of that. There is a letter that exists that you received from JHT.

**Q Okay. So Cornel Darden contacted JHT and that caused you to lose employment at JHT?**

A Yes. He falsely accused me of things.

See Exhibit A, page 213.

6. Plaintiff's employment at JHT was terminated because she used JHT computers in violation of JHT policies and procedures and because Plaintiff refused to acknowledge the written warning requested of her by JHT. See documents from response to Subpoena by JHT attached hereto as Exhibit D.

#### **LOSS OF SECURITY CLEARANCE.**

7. Plaintiff received the lowest level security clearance within the United States security clearance world as part of her employment at JHT. That level is "Secret". Plaintiff contends that Defendants caused her to lose her security clearance. See Exhibit C, page 5.
8. As shown above in paragraph 7, Plaintiff admitted that her loss of employment was due to the actions of Cornel Darden. See Exhibit A, page 213.
9. The letter from a JHT security officer states that Plaintiff's security clearance of "Secret" was tied to being employed by JHT, a federal defense contractor. See Exhibit D (which includes a security clearance letter from Lawrence Kennedy).

**PLAINTIFF’S FALSE “TOP SECRET” SECURITY CLEARANCE CLAIMS**

10. Plaintiff claimed to be a “Top Secret DoD employee” when filing a sworn statement against Theresa Bhoj before the Lake County Florida Circuit Court. See Lake County Florida Circuit Court Petition for Injunction for Protection Against Stalking (hereinafter “Petition”) attached hereto as Exhibit E).
11. Plaintiff did not have a “Top Secret” security clearance while working at JHT. See JHT letter included in Exhibit D. In fact, Plaintiff did not have a “Top Secret” security clearance at any time. See Plaintiff’s Answers to Interrogatories attached hereto as Exhibit F.
12. In a sworn testimony, Plaintiff claimed to have a “Top Secret” security clearance while purportedly employed by Hewlett Packard (“HP”) despite having already answered written discovery that she did not have a “Top Secret” security clearance. See Exhibit A, pages 215-16 and Exhibit F. Nevertheless, Plaintiff was never employed by HP. See employment verification response from HP attached hereto as Exhibit G. Plaintiff did not list HP as a prior employer on her application for employment with JHT. See Exhibit D. Plaintiff did not identify HP as a prior employer when she was asked to provide her work history. See Exhibit A, pages 20-27.
13. Similar to Plaintiff’s claims of having a “Top Security” security clearance while employed by HP, Plaintiff also made the same claim as to having worked as an employee with a “Top Secret” security clearance at Kratos and General Dynamics. However, neither employed her and neither was listed on her application for employment at JHT. See Exhibit A, pages 215-217 and Exhibit D.
14. According to the United States Government, Plaintiff has never had a “Top Secret” security clearance and the only clearance of “Secret” was while employed at JHT. See Exhibit D (security clearance letter from Lawrence Kennedy).

**FALSE CLAIM OF BEING A DEPARTMENT OF DEFENSE EMPLOYEE.**

15. Plaintiff has never been employed by the Department of Defense (“DoD”). See Exhibit A, pages 20-27, 217. Plaintiff alleged she was a “Top Secret DoD employee” in her sworn statement before the Lake County Florida Circuit Court. See Exhibit E, paragraph 9. The reference to “DoD” in Plaintiff’s Lake County Florida Circuit Court Petition against Theresa Bhoj was a reference to the Department of Defense. See Exhibit A, page 271.
16. Plaintiff acknowledged that “DoD” stood for Department of Defense and also admitted she was never employed by the Department of Defense while employed at JHT. See Exhibit A, page 271.

## **WHO DEEMS WHO A HIGH LEVEL SECURITY RISK?**

17. Plaintiff claimed that her “employer” deemed Theresa Bhoj a “high level security risk” in her sworn statement before the Lake County Florida Circuit Court. See Exhibit E.
18. Plaintiff admitted that she has not drawn any salary nor was she paid any wages from any entity that she formed, managed or owned at the time that she filed her Lake County Florida Circuit Court Petition against Theresa Bhoj. See Exhibit A, pages 31-34. Thus, at the time of Plaintiff’s filing of the Lake County Florida Circuit Court Petition, her only “employer” was JHT. See Exhibit A, page 271.
19. JHT denied the allegations in the Petition against Theresa Bhoj. See letter from Holland and Knight dated December 14, 2020 attached hereto as Exhibit H.
20. When asked to explain why Plaintiff alleged in her sworn Petition that her employer deemed Theresa Bhoj a high level security risk, Plaintiff claimed that the LLC she formed and which she is the sole member of (Project Change Consultants, LLC) deemed Ms. Bhoj a high level security risk and then admitted that she herself deemed her neighbor (Ms. Bhoj) a high level security risk. See Exhibit A, page 270.
21. The statement that her employer deemed Theresa Bhoj a high level security risk, in context of the Lake County Florida Circuit Court Petition, clearly shows that Plaintiff intended to mislead the Florida court into thinking that either the Department of Defense or JHT made an official assessment of Ms. Bhoj being a purported high level security risk. See Exhibit A, page 270, and Exhibit E.

## **PLAINTIFF’S FALSE INCOME CLAIMS**

22. Within Plaintiffs’ 26(a) disclosures Plaintiff alleged her injury was loss of employment at JHT with an annual salary of \$80,000/yr. See Exhibit C. However, according to JHT’s business records, provided in their documents in response to Subpoena, Plaintiff did not have an annual salary of \$80,000/yr. Plaintiff’s actual annual salary at JHT was \$63,500. See Exhibit D. (Offer letter and pay stubs all reflect an annual salary of \$63,500/yr.)
23. Within Plaintiff’s third bankruptcy petition of September 27, 2018 Plaintiff claimed no income from any source. See Voluntary Petition for Individuals Filing for Bankruptcy filed September 27, 2018 attached hereto as Exhibit I.
24. In Plaintiff’s Complaint to Determine Discharge-ability of Student Loan dated September 27, 2018, Plaintiff claimed no income and a permanent disability preventing her from performing any work. See Complaint to Determine Discharge-ability of Student Loan attached hereto as Exhibit J.

25. On October 16, 2018, while applying for a fee waiver, Plaintiff filed a sworn statement in the Lake County Florida Circuit Court indicating that she had no income whatsoever. See Application for Determination of Civil Indigent Status (hereinafter “Fee Waiver Petition”) attached hereto as Exhibit K
26. On October 16, 2018, immediately after securing a fee waiver from the Lake County Florida Circuit Court and during the pendency of Plaintiff’s third bankruptcy, Plaintiff filed with the Circuit Court of Lake County a Family Law Financial Affidavit alleging income of \$4,000 per month, a copy of said Affidavit is attached hereto as Exhibit L.
27. No amendments were made to Plaintiff’s bankruptcy filing between the filing date of September 27, 2018 and October, 16, 2018, nor after the filing of the Family Law Financial Affidavit with the Lake County Florida Circuit Court. See Federal Bankruptcy Docket from Plaintiff’s 2018 (3<sup>rd</sup>) Bankruptcy filing attached hereto as Exhibit M.
28. When asked about the \$4,000 per month of income not disclosed on her sworn bankruptcy petition, Plaintiff alleged that she was an Uber driver and during the period of 2017-2019 she was driving for Uber. See Exhibit A, pages 32-33, & 273-274. Plaintiff offered no explanation for the omission of the \$4,000/mo. income from her bankruptcy filing or omitted from her Fee Waiver Petition with the Lake County Florida Circuit Court where on the same day she claimed no income. See Exhibit A, pages 32-33 & 273-274. Compare Exhibits K & L.
29. Plaintiff alleged that her immediate employer prior to working for JHT was Incoma. See Exhibit A, page 24. But, Plaintiff testified later that her employer prior to JHT was General Dynamics. See Exhibit A, page 269.

**PLAINTIFF’S CLAIM SHE CAN’T WORK DUE TO PERMANENT DISABILITY**

30. Prior to seeking a discharge of her student loan debt via the U.S. Bankruptcy Court Plaintiff submitted a FOIA request to the U.S. Department of Education seeking information on how to avoid repayment of her student loan debt. See Select pages from the U.S. Dept. of Education FOIA Summary of Requests attached hereto as Exhibit N. See also, U.S. Dept of Education FOIA spreadsheet cataloging all FOIA requests in 2015 at: <https://www2.ed.gov/policy/gen/leg/foia/2015-foia-log.xlsx>.
31. On September 27, 2018, in connection with Plaintiff’s third bankruptcy petition, she filed an adversarial proceeding in the Bankruptcy Court seeking the discharge of student loan debt contending that she was permanently disabled as a result of purportedly having had three strokes. See Exhibit J (Plaintiff’s Complaint to Determine Discharge-ability of Student Loan).

32. Plaintiff testified that from 2017 through 2019 (after her purported three strokes and during her bankruptcy proceedings), she was employed as an Uber driver making \$4,000 per month as an Uber Driver. See Exhibit A, pages 32-33 & 273-274. Her employment as an Uber driver was not disclosed on her sworn statement related to her application for employment. See Exhibit D.

**PLAINTIFF'S FALSE PhD/DOCTOR CLAIMS (A CONSISTENT AND ONGOING WHOPPER OF A LIE)**

33. Attached to the Amended Complaint in this case is an Exhibit wherein Plaintiff claimed to have a PhD. See Exhibit B, Exhibit 3, page 15 (or Docket No. 5-1, Page 15 of 42).
34. Plaintiff, while under oath before the U.S. Patten and Trademark Office in a written Declaration, stated that she had a PhD from Capella University. See Declaration of Bonnie Alicea before the U.S. Patten and Trademark Office claiming a PhD from Capella University attached hereto as Exhibit O
35. However, Capella University denied having granted a PhD to Bonnie Alicea. See Letter from Capella University dated December 9, 2021 attached hereto as Exhibit P. See also Exhibit A, pages 280-281.
36. During a deposition of Plaintiff, she acknowledged the sworn Declaration that she executed contained the false statement that she had a PhD from Capella University. See Exhibit A, pages 280-281.
37. Plaintiff alleged herself to be a "Doctor" in the Petition she filed in Lake County Florida Circuit Court against Threasa Bhoj. See Exhibit E.
38. Plaintiff signed numerous letters claiming to have a PhD. See Exhibit B, Document No. 5-1, page 15. See also statements or documents of Plaintiff using PhD or describing herself as a doctor attached hereto as Exhibit Q.
39. During Plaintiff's deposition on February 16, 2022, she claimed that she could not remember a time where she held herself out as a doctor. See Exhibit A, pages 134-137. After a video was played with Plaintiff stating, "Hi, My name is Bonnie Kurowski and I am a doctor of Psychology..." Plaintiff acknowledged that it was her in the video and that she used those words. Id.
40. Even Plaintiff's Petition filed in the Lake County Florida Circuit Court claimed an injury to her reputation as a "Doctor". See Exhibit E. In Plaintiff's Declaration before the U.S. Patent and Trademark Office, she claimed to have a PhD. See Exhibit O. See also Exhibit B, Document No. 5-1, page 15.

**PRIOR FINDING PLAINTIFF MADE A FALSE STATEMENT CLAIMING OWNERSHIP OF A TRADEMARK NEVER ISSUED.**

41. Plaintiff has never been granted a trademark. See Exhibit F (Plaintiff's Answers to Interrogatories).
42. The Administrative Trademark Judges, in the matter of Plaintiff's failed attempt to trademark the name of her neighborhood (Verde Ridge), made a finding that Plaintiff falsely claimed a trademark in a cease-and-desist letter she published on the same date as her application for a Trademark associated with the name Verde Ridge which was used by the Homeowners Association situated in Clermont, Florida. See Order and Opinion of Administrative Trademark Judges for the U.S. Patent and Trademark Office, filed April 11, 2019 attached hereto as Exhibit R.

**WHO'S COUNTING? NOT ONE, NOT TWO, BUT THREE BANKRUPTCY PETITIONS?**

43. Plaintiff alleges she was placed in a false light by Defendants because Defendant Kraft referenced Plaintiff as having filed two (2) bankruptcy petitions. See Exhibit B, paragraph 15.
44. During Plaintiff's deposition she was asked how many times she had filed for bankruptcy protection. See Exhibit A, page 11. Plaintiff answered two (2) times. See Exhibit A, page 11.
45. This was despite Plaintiff's allegation in the Amended Complaint that "the Defendants falsely stated in the article that Plaintiff had filed bankruptcy twice." Further, inquiry solidified that her testimony as to the number of times she filed for bankruptcy was not once, not three (3) times, but only two (2) times filing bankruptcy. See Exhibit A, page 11.
46. Nevertheless, court records show that Plaintiff filed three (3) separate times for bankruptcy relief. Plaintiff's first bankruptcy petition was with her first husband under her then married name of Welsh (ND IL 96 BK 28146).
47. When confronted with the filing under the surname of Welsh, Plaintiff acknowledged that she resided at the address listed on the petition and was previously married to the joint debtor Steve Welsh. See Exhibit A, pages 277-278. See also Federal Bankruptcy Docket from Plaintiff's 2018 (3<sup>rd</sup>) Bankruptcy filing (attached hereto as Exhibit M) listing two prior bankruptcy petitions at the time of Plaintiff's 2018 bankruptcy filing. (Bonnie's Bankruptcy cases include the following case numbers ND IL 96 BK 28146, ND IL 2008 BK 4484, MD FL 2018 BK 05944). Accordingly, Plaintiff's claim in this case that Defendants made a false statement associated with Plaintiff filing two bankruptcy petitions is simply false. Not only did she file two bankruptcy petitions, she filed three bankruptcy petitions.

**CLAIMS OF DEFENDANTS' RACKETEERING CONVICTIONS & INVESTIGATION**

48. The Defendants named in this case have never been convicted of violations of the Racketeer Influenced Corrupt Organization Act. See Plaintiff's Responses to Defendants' First Requests for Admissions of Fact Propounded Upon Bonnie Kurowski attached hereto as Exhibit S.
49. Plaintiff has alleged that Defendants in this case have been found guilty of racketeering. See Exhibit S.
50. Inquiry of Plaintiff revealed that she claimed that Kirk Allen's purported predicate act was killing a deer (purportedly the murder predicate act) and her purported knowledge of an FBI Racketeering Investigation into Kirk Allen came to her from a purported statement from Jerel Jones, Chief of Macomb Illinois Police Department. See Affidavit of Jerel Jones attached hereto as Exhibit T.
51. However, Jerel Jones disavowed having ever told Plaintiff that the FBI was investigating Kirk Allen for racketeering. See Exhibit T

**PLAINTIFF'S MYSTERIOUSLY VANISHING AND RE-APPEARING RV**

52. Within Plaintiff's most recent bankruptcy petition dated September 18, 2018 Plaintiff claimed no income, but she had a list of assets including a recreational vehicle. See Exhibit I.
53. The assets listed on Plaintiff's Family Law Financial Affidavit filed with the Lake County Florida Circuit Court on October 16, 2018 does not list any of the assets shown on Plaintiff's third bankruptcy petition filed just twenty-eight (28) days earlier. Compare Exhibit I with Exhibit L.
54. Omitted from Plaintiff's Family Law Financial Affidavit of October 16, 2018 but disclosed on her then recent bankruptcy petition was her valuable recreational vehicle (RV). Id.
55. According to recent court filings the RV, listed in Plaintiff's 2018 bankruptcy petition but not disclosed in her Fee Waiver Petition, was tendered to a creditor via repossession after Plaintiff had filed the Fee Waiver Petition. See Documents related to repossession of RV attached hereto as Exhibit U.

**NO ALLEGATIONS RELATED TO DEFENDANTS BENFORD, BRZANA, GRIMMENG, WING OR BECKER**

56. Plaintiff's Amended Complaint fails to allege that Defendants Alyssia Benford, Cynthia Brzana, Sherri Grimmenga, Kristina Wing or Becky Becker have published any statements concerning Plaintiff. See Exhibit B.

57. Defendants Benford, Brzana, Grimmenga, Wing, and Becker are not officers, agents or employees of Edgar County Watchdogs, Inc. See Affidavit of Kirk Allen attached hereto as Exhibit V. See also Affidavit of John Kraft attached hereto as Exhibit W.
58. When asked to provide specific statements made by Defendants in Interrogatories, Plaintiff elected to answer by directing Defendants to specific pages of produced documents. However, those identified pages do not show any statements by Defendants Benford, Brzana, Grimmenga, Wing, or Becker. See Answers to Interrogatories and respective pages produced in Exhibit F.

### **MYSTERIOUS GAG ORDER**

59. Plaintiff alleged that Kirk Allen, John Kraft and Edgar County Watchdogs, Inc., were subject to a gag order. See Exhibit B, Document No. 5-1, page 36. Despite the claim in Plaintiff's Exhibit, no gag order was ever entered involving any of the Defendants or their counsel. See Exhibit V and W.

### **FALSE CLAIM THAT HOMESCHOOLING WAS THE RESULT OF PURPORTED THREATS**

60. Plaintiff claimed that she suffered an injury in the need to homeschool her daughter as a result of purported threats, stalking and intimidation by Defendants. See Exhibit C.
61. However, according to Erik Phelps who was living with Plaintiff at the time her daughter was to be homeschooled, the real reason for the homeschooling of Plaintiff's daughter was the request by her daughter to be homeschooled because Plaintiff's daughter did not like her school. See Deposition Transcript of Erik Phelps attached hereto as Exhibit X, page 31.

### **FALSE STATEMENTS IN GoFundMe WEB PAGE**

62. Plaintiff started a "GoFundMe" web page seeking contributions from third persons for the purpose of purportedly fighting an insurgency related to Edgar County Watchdogs, Inc. (ECW). So far Plaintiff's GoFundMe web page has two contributions including the first contribution made by Plaintiff herself. See GoFundMe web page attached hereto as Exhibit Y. See also Exhibit A, pages 161-164.
63. Within Plaintiff's GoFundMe web page, Plaintiff makes a statement that the photograph shown therein was of ECW as an alleged hate group training an insurgency. The exact words used in the GoFundMe web page are:

*My name is Bonnie and I am with Fight for Illinois. We just went through vicious election cycles in IL for local elections. During this process we*

*stumbled upon a local hate group called ECW. They are training insurgency and doing hostile takeovers of our local government bodies. **This is their picture.** They are not watchdogs or news. They are fake news. They slander and defame people, file hundreds of FOIA requests, sue, and do anything to lie, cheat and steal their people in office to have access to information they can sue on, and profit from taxpayers. In the process we are being left with the bill and poorly qualified elected officials which are racist, believe in insurgency, destroy our government, and use us as cash cows.* Emphasis added. See Exhibit Z.

64. The photograph shown on Plaintiff's GoFundMe web page was actually a picture of a BLM protest in London England. The photograph readily shows British "Bobbies" in the photograph. See and Exhibit V (Affidavit of Kirk Allen) and Exhibit Y (GoFundMe web page with BML protest photo).
65. Despite Plaintiff's GoFundMe web page articulating that the photograph was of ECW, Plaintiff stated in her deposition testimony that she downloaded the photograph from a gallery of available photos from GoFundMe. See Exhibit A, pages 35-36.
66. Plaintiff's claim of downloading photos within GoFundMe's web page from purportedly pre-selected photos is false, as GoFundMe.com has no photographs to select to download. Rather, a user uploads his photographs or images to use in connection with the user's GoFundMe web page. See Exhibit V (Affidavit of Kirk Allen).

#### **ECW PURPORTEDLY LINKED TO THE WASHINGTON, D.C. SIEGE**

67. Plaintiff contended that Defendants Allen, Kraft and Benford were linked to the Washington, D.C. siege because purportedly Jeanne Ives, (former Republican candidate for Illinois Governor) was purportedly present at the U.S. Capitol Building on January 6, 2021 and was purportedly reading bible verses at the time of the protest. Jeanne Ives was somehow linked to the riot and Defendants Kirk Allen and John Kraft on that basis. See Exhibit A, pages 224-225.
68. However, Jeanne Ives was not even present in Washington, D.C. on January 6, 2021. See Affidavit of Jeanne Ives attached hereto as Exhibit Z.

#### **PLAINTIFF'S FALSE CLAIM THAT BENFORD FILED LAWSUITS ON TAXPAYER DIME AND FILED A LAWSUIT DETERMINED TO BE FRIVOLOUS.**

69. Plaintiff claimed that Defendant Alyssia Benford had filed multiple lawsuits on taxpayer dime. See Exhibit B, Document 5-1, page 13. No such lawsuits have ever been filed by Alyssia Benford. See Affidavit of Alyssia Benford attached hereto as Exhibit AA.

70. Likewise, Plaintiff claimed Alyssia Benford filed a lawsuit determined to be frivolous. See Exhibit B, Document No. 5-1, page 13. In fact, Alyssia Benford was never a party to a lawsuit determined to be frivolous. See Exhibit AA.

#### **CLAIM OF LETTER DELIVERED TO WILL COUNTY STATE'S ATTORNEY**

71. Before this Court Plaintiff contended that she wrote a letter to Jim Glasgow and attached as an Exhibit to the Amended Complaint a letter addressed to James Glasgow, Will County State's Attorney. See Exhibit B, Document No. 5 at paragraph 22 and Document No. 5-1, Exhibit 4, pages 16-18.
72. When Mr. Glasgow was asked about the letter attached to Plaintiff's Amended Complaint, he articulated he had never seen the letter before and knew nothing about it. See Affidavit of Jim Glasgow attached hereto as Exhibit AB.

#### **CLAIM OF NO WRITTEN COMMUNICATION WITH NYOTA FIGGS**

73. Plaintiff was asked if she had any written communications with Nyota Figgs. In response to this line of questioning Plaintiff denied having had any written communications with Ms. Figgs or communicating in writing in any way other than by phone. See Exhibit A, pages 170-172.
74. However, when confronted with Plaintiff's delivery of a document purporting to be the Affidavit of Nyota Figgs to the Illinois ARDC with a request for an investigation of Defense counsel, Plaintiff claimed that she received the Affidavit anonymously from her tip line. See Exhibit A, page 172. Her purported tip lines have no mechanism for delivery of documents.

#### **FALSE STATEMENT ABOUT SIGNING A PERFORMER**

75. Plaintiff testified that she just signed a performer to her record company "Tontell Records" as follows:

**Q Okay. Had you any other agreements with other individuals associated with this Tontell Records production? Do you have any other agreements that were pending?**

A I have verbal agreements.

**Q Who did you have a verbal agreement with?**

A I had a verbal agreement with one artist named Charles something. A big blues artist who was in hall of fame, blues hall of fame, that fell through because of this. I had agreements with Zanious Motown for running and operating the studio. I had spoken with some other people about some other work to be done for that studio that has now been placed on indefinite hold.

**Q Just identify the persons by name. Nothing other than that.**

A Okay, I just did.

**Q You said Charles somebody. What's Charles somebody's last name?**

A I'm trying to remember.

**Q What was the definite and specific terms of the agreement with this Charles somebody?**

A We were going to take him on as a – as his label and his studio and his manager.

**Q Charles, in the hall of fame. What hall of fame is he in?**

A He's in the blues hall of fame. He was just inducted in 2019. His name will come to me, I just can't think of it right this second.

See Exhibit A, pages240-241.

76. Publicly available records of the Blues Hall of Fame show no inductee with the first name “Charles” in the year 2019. See Blues Hall of Fame online search attached hereto as Exhibit AC and Exhibit V (Affidavit of Kirk Allen). See also search available at <https://blues.org/awards/>. In fact, the only inductee with “Charles” in his name is Ray Charles; but, Plaintiff could not remember Charles’ last name. Id.

#### **PLAINTIFF ADMITTED ALLEN, KRAFT AND BENFORD HAD NOT MADE A FALSE STATEMENT ABOUT HER**

77. Defendant Kirk Allen has not made any false statement of fact related to Plaintiff. See Exhibit A, pages 232- 234.
78. Defendant John Kraft has not made any false statement of fact related to Plaintiff. See Exhibit A, pages 234-236.
79. Defendant Alyssia Benford has not made any false statement of fact related to Plaintiff. See Exhibit A, pages 236-37.

#### **PLAINTIFF’S ACTUAL MINDLESS RAMBLING**

80. Attached hereto as Exhibit AD is the article Kurowski complains to this Court concerning her e-mail to public officials with the subject line reading “Security Breach: immediate action”. Defendant ECW characterized the e-mail in their article as containing mindless ramblings. The statement by ECW is objectively true when examining the e-mail of November 10, 2020 authored by Kurowski.

Dated: April 19, 2022.

Respectfully submitted,

John Kraft, Kirk Allen, Alyssia Benford, Cynthia Brzana, Sheri Grimmenga, Kristina Wing, Becky Becker, and Edgar County Watchdogs, Inc., an Illinois corporation.

By: /s/Robert T. Hanlon  
One of Defendants' Attorneys

**CERTIFICATE OF SERVICE**

I, Robert T. Hanlon, an attorney, do hereby certify that the foregoing document was served upon the following counsel of record by e-mail from Woodstock, IL, on this 19<sup>th</sup> day of April, 2022, as follows:

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Michelle LaGrotta  
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/s/Robert T. Hanlon  
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**LIST OF EXHIBITS**

- Exhibit A – Deposition Transcript of Bonnie Kurowski taken on February 16, 2022**  
(select pages only)
- Exhibit B – Plaintiff’s Amended Complaint.**
- Exhibit C – Plaintiff’s Initial 26(a) Disclosures**
- Exhibit D – JHT’s Response to Subpoena**
- Exhibit E – Plaintiff’s Petition for Injunction against T. Bhoj**
- Exhibit F – Plaintiff’s Answers to Interrogatories**
- Exhibit G – Employment Verification Response from Hewlett Packard**
- Exhibit H – Letter from Holland and Knight dated December 14, 2020**
- Exhibit I – Plaintiff’s Voluntary Petition for Bankruptcy (Plaintiff’s Third Bankruptcy)**
- Exhibit J – Plaintiff’s Complaint to Determine Discharge-ability of Student Loan**
- Exhibit K – Plaintiff’s Application for Determination of Civil Indigent Status**
- Exhibit L – Plaintiff’s Family Law Financial Affidavit**
- Exhibit M – Federal Bankruptcy Docket from Plaintiff’s 2018 (3<sup>rd</sup>) Bankruptcy filing**
- Exhibit N – Select pages from the U.S. Dept. of Education FOIA Summary of Requests**
- Exhibit O – Declaration of Bonnie Alicea before the U.S. Patent and Trademark Office**
- Exhibit P – Letter from Capella University dated December 9, 2021**
- Exhibit Q – Statements or documents of Plaintiff describing herself as a doctor or PhD**
- Exhibit R – Order & Opinion of Administrative Trademark Judges**
- Exhibit S – Plaintiff’s Responses to Defendants’ First Requests for Admissions of Fact**
- Exhibit T – Affidavit of Jerel Jones (Macomb Police Chief)**

**Exhibit U – Documents related to repossession of RV**

**Exhibit V – Affidavit of Kirk Allen**

**Exhibit W – Affidavit of John Kraft**

**Exhibit X – Deposition Transcript of Erik Phelps (select pages only)**

**Exhibit Y – Plaintiff’s GoFundMe web page**

**Exhibit Z – Affidavit of Jeanne Ives**

**Exhibit AA – Affidavit of Alyssia Benford**

**Exhibit AB – Affidavit of Jim Glasgow (Will County State’s Attorney)**

**Exhibit AC – Blues Hall of Fame online search available at <https://blues.org/awards/>**

**Exhibit AD – Illinois Leaks Article and source e-mail**