

# EXHIBIT

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**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, )  
SHERRI GRIMMINGS, KRISTINA WING, )  
BECKY BECKER, and EDGAR COUNTY )  
WATCHDOGS, INC., an Illinois Corporation, )

Judge Feinerman  
Magistrate Judge Fuentes

Defendants )

**PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

**NOW COMES** the Plaintiff, BONNIE KUROWSKI, by and through her attorney, Wayne B. Giampietro, and pursuant to Federal Rule of Procedure 26(a)(1), makes the following disclosures:

1. The name, and if known, the address and telephone number of each individual likely to have discoverable information relative to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

**ANSWER:**

- A. Plaintiff, Bonnie Kurowski has knowledge of all issues alleged in the complaint.
- B. The following individuals are either defendants or are working with and supporting the actions of Defendant Edgar County Watchdogs, Inc. and therefore have knowledge of the actions taken by Defendants relating to Plaintiff:

Tim Grant, [REDACTED] 60481

Gene Becker, [REDACTED] 60481

Jerry Grimmenga, [REDACTED] IL 60481

Mark Wing, [REDACTED] IL 61455

Sandy and Malcolm Boyer, [REDACTED] IL 61455

Antonio Timothee, [REDACTED] IL 60440

Theresa and Mo Bhoj, [REDACTED] IL 34715

Deresa Hoogland, [REDACTED] IL 60440

Cornell Darden, Address unknown

Melissa Boatman, [REDACTED] IL 60440

Colin Trust, Address unknown

Dennis Raga, [REDACTED] IL 60440

Jeannie Ives, [REDACTED] IL 60189

Kimi Ellen, Benford & Assoc Partners, [REDACTED], IL  
60440

Timothy Watson, Benford & Assoc Partners, [REDACTED] Brook,  
IL 60440

Kulsum Ali, Dupage Township Clerk, [REDACTED], IL  
60440

C. The following individuals have knowledge of the acts of Edgar County Watchdogs, the actions it and the individual defendants have taken to demean or defame Plaintiff or others; or have knowledge of the facts concerning the matters about which Defendants have written concerning Plaintiff.

Nichole Kroncke, Attorney Shelby County, 1541 E 1200 North Rd., Shelbyville, IL 62565

Billy Kroncke, Police Officer/ husband of State's attorney, 1541 E 1200 North Rd.,  
Shelbyville, IL 62565

Jim Glasgow, State's attorney Will County, Illinois

Rhonda Parker, State's Attorney Cole County Assistant, [REDACTED]  
Charleston, IL 61920

Jessie Danley, State's Attorney Cole County [REDACTED] ston, IL 61920

Tom Gibbons, Madison County States Attorney, [REDACTED] ville, IL  
62025

Jackie Traynere, Will County Board Member, [REDACTED] k, IL 60440

John Norton, Former Wesley Township Highway Commissioner, [REDACTED]  
Wilmington, IL 60481

Heather McMeekan, Racial Injustice Org & others, [REDACTED] omb, IL 61455

Samuel G. Richardson, Central IL LGBTQ Orgs, [REDACTED] IL 62644

Joann Quigley, Former Wesley TWNSP Supervisor, [REDACTED] lmington, IL  
60481

Terry Wilke, Former Avon Township Supervisor, [REDACTED], Round Lake Beach,  
IL 60073

Joe Musso, Former Pecotonica Twnsp Supervisor, [REDACTED] cotonica, IL 61063

Maripat Oliver, Former DuPage Township Trustee, [REDACTED] Bolingbrook,  
IL 60440

Felix George, Former DuPage Township Trustee [REDACTED] ngbrook, IL  
60440

Ken Burgess, Former DuPage Township Trustee, [REDACTED], Romeoville, IL  
60446

Bill Mayer, Former DuPage Township Supervisor, [REDACTED] ngbrook, IL  
60440

Linda Young, DuPage Township Staff, [REDACTED] olingbrook, IL 60440

Gary Marschke, DuPage Township Supervisor, [REDACTED] lingbrook, IL  
60440

Karen Lukasik, Algonquin Township Clerk, [REDACTED] IL 60013

Tari Renner, former Bloomington IL Mayor, [REDACTED] ngton, IL 61704

Mike Medlin, Wesley Township Supervisor, address unknown

Lynn Williams, Shelby County Trustee, [REDACTED] e, IL 62565

John Nelson, Pecotonica Township Attorney, [REDACTED] IL 61104

James Kelly, Algonquin Township Attny, [REDACTED] atine, IL 60067

Mike Walters, Madison County Board, [REDACTED] o, IL 62010

Ricky Willimas, Danville Mayor, [REDACTED] L 61832

Diane Wolfe Marlin, Urbana Mayor, [REDACTED] 61801

Derek Lee, Algonquin Township Road District, [REDACTED] lake,  
IL 60014

Diane McGuire, College of DuPage, former trustee, [REDACTED] perville, IL  
60540

Brady Allen, Coles County Trustee/attny for States Attny, [REDACTED]  
Charleston IL 61920

Dan Vera, Joliet Twmsp., Supervisor, [REDACTED] IL 60435

Lynn Williams, Shelby County Trustee, [REDACTED] le, IL 62565

Officer Alexa Dougherty- Clermont Police Department- 352-394-5588,  
[ADOUGHERTY@CLERMONTFL.ORG](mailto:ADOUGHERTY@CLERMONTFL.ORG)

Tom Gorgone, [REDACTED] l.com

Scott Skaletsky, Benjamin & Shapiro, Ltd., [REDACTED], IL  
60601

2. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody or control of the parties that are relevant to the disputed facts alleged with particularity in the pleadings.

ANSWER: Plaintiff has in her possession copies of numerous postings on the Internet by Defendants of false statements about her, as well as documents evidencing the damages she has suffered as set forth in response to Question no. 3. Plaintiff also has photographs of the stalking of her by defendants.

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying, as under rule 35 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

ANSWER: Plaintiff has suffered the following losses as a result of the actions of defendants:

Loss of employment with JHT, Inc. Plaintiff's salary with JHT was \$80,000.00 per year, which amount of income she is no longer receiving as a result of the actions of Defendants

Loss of security clearance

Delay/stop in the opening of Fight for IL, a 501c3 not for profit corporation, due to Defendant's false light article about grant raising, causing Plaintiff to lay off 3 employees and to disband the board until a time it can operate without defendants' attacking this entity. This cost Plaintiff initial operating opening costs including filing and registrations, bank accounts, software purchases, work paid out, and more. The failure for this company to launch is solely the result of Defendants' statements placing this company in a false light scaring the townships to ensure they do not donate to it.

Delay in start of IL Reporter and subsidiaries (Will County Reporter, Macomb Reporter, and Bolingbrook Reporter) causing all volunteer contributors/ journalists to have to operate by withholding their names and reducing my workforce and news. This cost Plaintiff initial operating opening costs including filing and registrations, bank accounts,

software purchases, work paid out, and more. Costs include multiple online websites, online presence, software, and start-up capital. Plaintiff was also unable to open other subsidiaries as a result of Defendants' actions.

Plaintiff was required to place security cameras placed on and around my home.

Plaintiff was required to file multiple police reports.

Plaintiff was required to vary schedules for child pick up and drop off times due to stalking by defendants.

Multiple times Plaintiff had to send child away for short times due to perceived threats from defendants

Plaintiff was forced to remove daughter from school to home school her.

Damage to Plaintiff's reputation online, which future employers are likely to see.  
Loss of information on personal Facebook account of 10 years, which contained pictures and memories of lost loved ones, due to their bomb reporting of Plaintiff's personal page. Then when Plaintiff opened another FB page they have been attacking that one since.

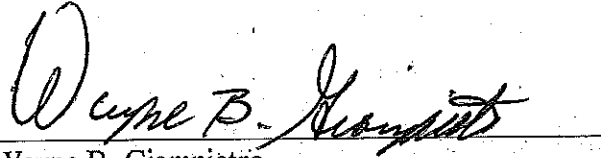
Loss of website Bolingbrook Watchdogs, since Defendants spoofed the image and name and opened another one.

Loss of the name Citizens for a Better Bolingbrook online, which Plaintiff had used since 2008. Defendants now use that to post fraud upon Plaintiff.

Damage to Plaintiff's relationship with her Masonic Lodges at Groveland, FL and Clermont, FL, as well as the Order of the Eastern Stars.

4. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER: Plaintiff has no insurance applicable to this case.

A handwritten signature in black ink, reading "Wayne B. Giampietro", written over a horizontal line.

Wayne B. Giampietro  
Attorney for Plaintiff

Of Counsel:  
Poltrock & Giampietro  
123 W. Madison St., Suite 1300  
Chicago, IL 60602  
(312) 236 0606; Fax: 312 236 9264  
wgiampietro@giampietrolaw.com  
Attorney I.D. 0947776

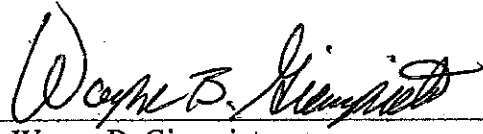


**CERTIFICATE OF SERVICE**

I certify that the foregoing copy of Plaintiff's Initial Disclosures Pursuant to Federal Rules of Civil Procedure 26(a)(1) was served on:

Robert T. Hanlon  
Law Offices of Robert T. Hanlon & Assoc., P.C.  
131 East Calhoun Street  
Woodstock, Illinois 60098  
Robert@ROBHANLONLAW.COM  
Illinois ARDC #6286331

on the 20<sup>th</sup> day of October, 2021, before the hour of 5:00 p.m. via email and United States Mail service.



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Wayne B. Giampietro