

# EXHIBIT

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

BONNIE KUROWSKI,	)	
	)	
Plaintiff,	)	No. 21-cv-4363
	)	
v.	)	The Honorable Judge Gary M. Feinerman
	)	
JOHN KRAFT, et al,	)	
	)	
Defendants.	)	

**PLAINTIFF'S RESPONSES TO DEFENDANTS' FIRST REQUESTS FOR  
ADMISSIONS OF FACT PROPOUNDED UPON BONNIE KUROWSKI**

NOW COMES, Plaintiff Bonnie Kurowski, by and through her attorneys Thomas G. Gardiner, Michelle M. LaGrotta, and Hamza Jaka of Gardiner Koch Weisberg & Wrona, for her responses to Defendants' First Requests for Admissions of Fact Propounded, she states as follows:

**RESPONSE TO DEFENDANTS' REQUEST FOR ADMISSIONS OF FACT**

1. Admit Kirk Allen has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 1.**

2. Admit John Kraft has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 2.**

3. Admit Cynthia Brzana has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 3.**

4. Admit Sherry Gremenga has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 4.**

5. Admit Krista Wing has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 5.**

6. Admit Alyssia Benford has not made any false statement of fact related to You.

**RESPONSE: Plaintiff denies this Request No. 6.**

7. Admit it was not unlawful for Alyssia Benford to share any public record of DuPage Township with any of the Defendants in this case.

**RESPONSE: Plaintiff objects to Request No. 7 in that it calls for a legal conclusion, not an admission of fact. To the extent it calls for an admission of facts, Plaintiff denies this Request No. 7. While the sharing of a public record by itself may not have been unlawful, Plaintiff contends that it was used for the purposes of starting a harassment campaign against her.**

8. Admit You suffered no injury from any act complained of in the Complaint in this case.

**RESPONSE: Plaintiff denies this Request No. 8.**

9. Admit Your employment at JHT was terminated because you use JHT computers

**RESPONSE: Plaintiff objects to Request No. 9 on the basis that it is vague and incomplete. Plaintiff denies that she was terminated from JHT because she used computers.**

10. Admit the publication by John Kraft and Kirk Allen dated 9/22/20 attached to your complaint within Exhibit 1 is factually true.

**RESPONSE: Plaintiff denies this Request No. 10. The contents in Exhibit 1 contain numerous opinion statements and statements that Plaintiff can not verify despite making a reasonable inquiry because Plaintiff cannot readily obtain sufficient information to enable her to admit or deny.**

11. Admit the publication by John Kraft and Kirk Allen dated 11/15/20 attached within Exhibit 1 to the Complaint in this case is factually true.

**RESPONSE: Plaintiff denies this Request No. 11. The contents in Exhibit 1 contain numerous opinion statements and statements that Plaintiff can not verify despite making a reasonable inquiry because Plaintiff cannot readily obtain sufficient information to enable her to admit or deny.**

12. Admit the photograph of You within Exhibit 2 of your complaint is a photograph you published online.

**RESPONSE: Plaintiff admits to this Request No. 12.**

13. Admit You have never been granted a trademark prior to the date of this Request for Admission of Facts.

**RESPONSE: Plaintiff admits to this Request No. 13.**

14. Admit You were never granted a Ph.D. from Capella University.

**RESPONSE: Plaintiff admits to this Request No. 14.**

15. Admit You swore under oath you had a Ph.D.

**RESPONSE: To the best of Plaintiff's understanding, this Request to Admit relates to her trademark application for Verde Ridge and accompanying opposition proceedings. Plaintiff submitted a declaration, but due to a scrivener's error, she was listed as having a Ph.D. despite indicating she did not complete her dissertation. She therefore denies this Request to Admit.**

16. Admit the publication attached to your complaint a Docket 1-1 (pg 23) is not about you.

**RESPONSE: Plaintiff denies this Request No. 16 if it is referring to Page ID# 23 (Page 13 of 42). Plaintiff admits this Request No. 16 if it is referring to Page 23 of 42 (Page ID# 33).**

17. Admit the publication attached to your complaint a Docket 1-1 (pgs 23-26) is not about you.

**RESPONSE:** Plaintiff denies this Request No. 17 if it is referring to Page ID# 23-26 (Pages 13-16 of 42). Plaintiff admits this Request No. 16 if it is referring to Page 23-26 of 42 (Page ID# 33-36).

18. Admit the statements contained in your complaint on Docket 1-1 pg 27 attributed to you are not true.

**RESPONSE:** Plaintiff denies this Request No. 18.

19. Admit as to Exhibit #6 to your Complaint (The December 25, 2020 publication by John Kraft wherein there is a re-published statement written by you) accurately depicts false statements made by you.

**RESPONSE:** Plaintiff denies this Request No. 19.

20. Admit You did not have "Top Secret" security clearance while working at JHT.

**RESPONSE:** Plaintiff admits to this Request No. 20 and further states that she had secret security clearance while working at JHT.

21. Admit You made a false statement in your 26(a) disclosures in this case.

**RESPONSE:** Plaintiff denies this Request No. 21.

22. Admit Exhibit 7 of your Complaint, (The December 29, 2020 publication by John Kraft shown on Docket 1-1 pg 29) wherein there is a re-published statement written by you with red lettering accurately depicts false statements made by you.

**RESPONSE:** Plaintiff denies this Request No. 22.

23. Admit Alyssia Benford has never removed any official record of any public body in violation of any law.

**RESPONSE:** Plaintiff denies this Request No. 23. Plaintiff believes there was a lawsuit filed involving Ms. Benford or against Ms. Benford for the removal of documents that had been previously requested by FOIA.

24. Admit Alyssia Benford was not censured.

**RESPONSE:** Plaintiff denies this Request No. 24. Defendant Benford stated in a lawsuit that there was a vote to censure her, but Plaintiff does not know the ultimate outcome of that lawsuit.

25. Admit Alyssia Benford has not ever filed a lawsuit determined to be frivolous.

**RESPONSE:** Plaintiff lacks the knowledge to confirm whether Alyssia Benford's lawsuits were determined to be frivolous by a court. She has made diligent attempts to investigate and can not confirm.

26. Admit that you lied under oath before the Patent and Trademark office in a written declaration.

**RESPONSE:** Plaintiff denies this Request No. 26. Please see Plaintiff's Response to Request No. 15 for further information.

27. Admit that you lied in the Complaint you filed in the matter of Kurowski v Bhoj filed in Lake County Florida.

**RESPONSE:** Plaintiff denies this Request No. 27.

28. You were not employed by the department of defense at the time that you filed suit against Teresa Bhoj.

**RESPONSE:** Plaintiff admits this Request No. 28. At the time, Plaintiff had companies that were registered with the Department of Defense, and that is what she intended to say.

29. Defendants John Kraft, Kirk Allen and Edgar County Watchdogs have never altered documents posted on any website controlled by any of them.

**RESPONSE: To the best of Plaintiff's knowledge, Plaintiff denies this Request No. 29.**

30. No defendants named in this case has ever been convicted of violations of the Racketeer Influenced Corrupt Organization Act.

**RESPONSE: Plaintiff does not know if any of the Defendants have been convicted of any Racketeer Influenced Corrupt Organization Act, and after investigation she does not have the ability to confirm or deny.**

Dated: February 2, 2022

Respectfully submitted,  
BONNIE KUROWSKI


By: /s/ Michelle LaGrotta  
Michelle LaGrotta  
Gardiner Koch Weisberg & Wrona  
Attorney for Plaintiff

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VERIFICATION

I, Bonnie Kurowski, verify under penalty of perjury and pursuant to 28 U.S.C. § 1746, verify that the foregoing Plaintiff Bonnie Kurowski's Responses to Defendants' First Set of Requests for Production are true and correct.

Date: 2/2/2022

  
Bonnie Kurowski

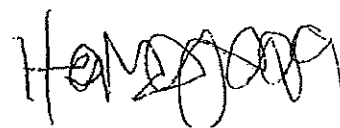


**CERTIFICATE OF SERVICE**

I certify that the foregoing copy of Plaintiff's Responses to Defendant's Requests to Admit Pursuant to Federal Rules of Civil Procedure 36 was served on:

To: Robert T. Hanlon  
Law Offices of Robert T. Hanlon & Assoc., P.C.  
131 East Calhoun Street  
Woodstock, Illinois 60098  
[Robert@robhanlonlaw.com](mailto:Robert@robhanlonlaw.com)  
Illinois ARDC #6286331

The 2<sup>nd</sup> day of February, 2022, via email.

A handwritten signature in black ink, appearing to read "Hamza Jaka", with a stylized flourish at the end.

Hamza Jaka