

**IN THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS**

ROBERT DORMAN and )  
DOUGLAS HULME )

Plaintiffs, )

v. )

MADISON COUNTY, an Illinois Municipal )  
Corporation )

Serve: Linda Andreas, County Clerk )  
Suite 109 )  
157 N. Main Street )  
Edwardsville, IL 62025 )

DAVID VUCICH )

Serve: 1135 West High Street )  
Edwardsville, IL 62025 )

THOMAS GIBBONS )

Serve: 75 Raes Creek Road )  
Granite City, IL 62040 )

CHRIS SLUSSER )

Serve: 157 N. Main Street, Ste. 125 )  
Edwardsville, IL 62025 )

RICK FACCIN )

Serve: 308 Harriett St. )  
Alton, IL 62002 )

RAY WESLEY )

Serve: 5023 Valleyview Dr. )  
Alton, IL 62002 )

MIKE WALTERS )

Serve: 1811 Primrose Lane )

Cause No. 2023LA001119

**JURY TRIAL DEMANDED**

Godfrey, IL 62025 )  
)  
JAMIE GOGGINS )  
)  
Serve: 306 Valley View Dr. )  
Edwardsville, Il 62025 )  
CHRIS BETHEL )  
)  
Serve: 924 Borri Drive )  
Maryville, IL 62062 )  
)  
ERICA HARRISS )  
)  
Serve: 145 Somerset Drive )  
Glen Carbon, IL 62034 )  
)  
PATRICK MCREA )  
)  
Serve: 157 N. Main Street )  
Suite 125 )  
Edwardsville, IL 62025 )  
)  
JEFF CONNOR )  
)  
Serve: 120 Stonebridge Bluff Drive )  
Maryville, IL 62062 )  
)  
MIKE PARKINSON )  
)  
Serve: 64 Steele Drive )  
Granite City, IL 62040 )  
)  
BOB DAIBER )  
)  
Serve: 425 N. Humbolt St. )  
Marine, IL 62061 )  
)  
TOM MCREA )  
)  
Serve: 6 Lilac Drive Lane )  
Bethalto, IL 62010 )  
)  
JENNIFER ZOELZER )  
)  
Serve: 7308 Bivens Road )  
Moro, IL 62067 )

WILLIAM MUDGE )  
 )  
 )  
 Serve: 10 Pine Hollow Court )  
 Edwardsville, IL 62025 )  
 )  
 JENNIFER MUDGE )  
 )  
 )  
 Serve: 10 Pine Hollow Court )  
 Edwardsville, IL 62025 )  
 )  
 )  
 Defendants. )

**COMPLAINT**

COMES NOW Michael A. Lawder, attorney for Plaintiffs Robert Dorman, and Douglas Hulme and for their Complaint state as follows:

**I PREAMBLE**

1. Plaintiffs filed a Complaint against these Defendants on August 6, 2021, against Defendants Madison County, Illinois, David Vucich, Chris Slusser, Thomas Gibbons, Chris Bethel, William Mudge, Jennifer Mudge and other Defendants alleging various state law claims and Federal Civil Rights claims under *42 U.S.C. Sec. 1983*. Certain of the Defendants removed that case to Federal Court on November 8, 2021. Those Defendants who did file a Motion to Dismiss which the Court and on March 23, 2022, Judge J. Phil Gilbert dismissed the Plaintiffs' Complaint *without prejudice* as to Defendants Madison County, David Vucich, Chris Slusser, Thomas Gibbons, Chris Bethel and Jennifer Mudge. However, that case remained pending as to Defendant William Mudge and another Defendant for lack of service, and the Court gave Plaintiffs until August 11, 2022, to effect service on these two Defendants, and then on August 15, 2022, Judge J. Phil Gilbert dismissed that case without prejudice pursuant to *F.R.C.P. 41*. *This action is now filed within one (1) year of said Dismissal.*

2. Plaintiff will have summons immediately issued by the clerk of the Madison County Circuit Clerk for each said Defendant listed above. This Complaint is filed on August 11, 2023.

## **II. PARTIES**

3. Plaintiffs Robert Dorman (hereinafter “Dorman”) and Douglas Hulme (hereinafter “Hulme”) are and were at all relevant times residents of Madison County, Illinois (Hereinafter referred to as “Madison County” or “Madison County, Illinois”). Both Plaintiffs were hired by Madison County in 2016 as Madison County IT Director and Madison County Administrator respectively. Both had a written contract of employment with Madison County and at all relevant times, all the parties, employees and agents were aware of the said written contract of employment that each of the Plaintiffs had with Madison County.

4. The Defendant, Madison County, Illinois is a County and municipal corporation operating and existing within the State of Illinois. The Defendant Madison County, Illinois operated a Sheriff’s Department and a State’s Attorney’s Office which was and is responsible for the acts of its employees while acting within the scope of their employment and is responsible under Illinois statutes for the policies, practices, and customs of the Madison County Sheriff’s Department and the Madison County States’ Attorney Office, and various other employees and to indemnify same. At all times relevant to this action, Madison County, Illinois was the employer of some of Defendants, David Vucich, and Defendant Gibbons and others including more specifically described below. All are necessary parties to this lawsuit. Madison County, Illinois is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

5. Defendant David Vucich at all relevant times is a Lieutenant in the Madison County Sheriff's Department and was a part of the "Madison County Public Corruption Task Force" which was convened by Defendant Thomas Gibbons more particularly described below. This Defendant is sued in his individual and official capacity. David Vucich is a necessary party to this action and venue is proper here because all of the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

6. Defendant Thomas Gibbons (hereinafter "Gibbons") was at all relevant times the Madison County Prosecuting Attorney who convened the "Madison County Public Corruption Task Force" more particularly described below. This Defendant is sued in his individual and official capacity. Defendant Gibbons is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

7. Defendant Chris Slusser was at all relevant times the Madison County Treasurer. This Defendant is sued in his individual and official capacity. Defendant Slusser is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

8. Defendant Chris Bethel was at all relevant times the Manager of Network Services for Madison County, Illinois. This Defendant is sued in his individual and official capacity. Defendant Bethel is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

9. Defendant William Mudge was at all relevant times a Circuit Judge for the Third Judicial Circuit at the Madison County Court House in Edwardsville, IL. At some time during

the relevant times of this lawsuit, he was the Chief Judge of the Third Judicial Circuit as well. This Defendant is sued in his individual and official capacity. Defendant Mudge is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

10. Defendant Jennifer Mudge was at some of the relevant times, the First Assistant Prosecutor with the Madison County States Attorney. This Defendant is sued in her individual and official capacity. Defendant Jennifer Mudge is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

11. Defendant John D. Lakin was at all of the relevant times, a member of the Madison County Sheriff's Department. This Defendant is sued in his individual and official capacity. Defendant John D. Lakin is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

12. Defendant Rick Faccin was, at all relevant times, the Madison County Auditor. This Defendant is sued in his individual and official capacity. Defendant Rick Faccin is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

13. Defendant Ray Wesley was at all relevant times a member of the Madison County Board. This Defendant is sued in his individual and official capacity. Defendant Ray Wesley is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

14. Defendant Mike Walters was at all relevant times, a member of the Madison County Board. This Defendant is sued in his individual and official capacity. Defendant Mike Walters is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

15. Defendant Jamie Goggins was at all relevant times, a member of the Madison County Board. This Defendant is sued in his individual and official capacity. Defendant Jamie Goggins is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

16. Defendant Erica Harriss was at all relevant times, a member of the Madison County Board. This Defendant is sued in her individual and official capacity. This Defendant is sued in her individual and official capacity. Defendant Erica Harriss is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

17. Defendant Patrick Mc Rea was at all relevant times Madison County Deputy Treasurer. This Defendant is sued in his individual and official capacity. Defendant Patrick McRea is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

18. Defendant Jeff Connor was at all relevant times, the Chief Deputy Sheriff of Madison County. This Defendant is sued in his individual and official capacity. Defendant Jeff Connor is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

19. Defendant Mike Parkinson was at all relevant times a member of the Madison County Board. This Defendant is sued in his individual and official capacity. Defendant Mike

Parkinson is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

20. Defendant Bob Daiber was at all relevant times, the Madison County Regional Superintendent of Schools. This Defendant is sued in his individual and official capacity. Defendant Bob Daiber is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

21. Defendant Tom Mc Rea was at all relevant times a member of the Madison County Board. This Defendant is sued in his individual and official capacity. Defendant Tom Mc Rea is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

22. Defendant Jennifer Zoelzer was, at all relevant times, the Madison County Deputy Auditor. This Defendant is sued in her individual and official capacity. Defendant Jennifer Zoelzer is a necessary party to this action and venue is proper here because all the events detailed herein occurred mostly in Madison County, IL pursuant to *735 ILCS 5/2-103*.

### **III. BACKGROUND AND NARRATIVE**

23. Madison County Illinois was long dominated by Democrats as a machine county along with St. Clair County and, of course, Cook County in Illinois. This began to change in 2010 with the election of a Republican, Kurt Prenzler as Madison County Treasurer while his opponent Democrat Party Boss, Fred Bathon was sentenced to prison after he was convicted of structuring Madison County property tax sales in a way that increased interest rates for the tax buyers in exchange for campaign contributions. Then in November 2016, this change accelerated with the election of Prenzler as Madison County Board Chairman beating longtime Democrat political boss, Alan Dunstan (hereinafter "Dunstan"). This created a power vacuum



within the Democratic party and did not sit well with the existing powers that be as many of their previous ways of campaigning came under new scrutiny and the prospect of Prenzler's Administration discovering county resources over the years had been used for prohibited political activities.

24. In effect on January 21, 2015, was the latest iteration of the Madison County government Electronic Communications Policies and Procedures (hereinafter "Procedures") which was adopted by the State's Attorney office and the Judiciary. It was done because these policies and procedures needed to be updated according to the County board Resolution approving the same. These policies and procedures govern Madison County electronic communications systems including the e-mail, the internet and cellular phones owned by the County. These policies were also adopted after the Madison County Sheriff's Department engaged the Madison County IT Department on matters relating to the Criminal Justice Agency as well. These Procedures also advises employees that there is no presumption of Privacy and referred to Section 4 which was Madison County's Right to Monitor use which in part states that Madison County reserves the right to monitor, intercept, access, disclose, retain print and delete all information created, sent received, or stored on its electronic communications systems at any time, with or without employee notice; and that the County Board Chairman or the County Administrator may provide written authorization to whomever they deem necessary to provide access to stored electronic communications. The Madison County States 'Attorney knew this was the policy and procedure as it has been the Madison County States Attorney's office policy since 2015, literally, word for word. As will be seen later in this Complaint, Gibbons knew that the entire premise of his task force was based upon a false premise that there is no right of persons to monitor electronic communications in Madison County and that Dorman never tried

to snatch paperwork from county board member Lisa Ciampoli's or a County Clerk's hands or had access to the video surveillance system.

25. Plaintiff Hulme worked for Prenzler as Madison County Deputy Treasurer beginning in 2014, and upon Prenzler's election as County Board Chairman in 2016 he was appointed the County Administrator and confirmed by a vote of the Madison County Board. Plaintiff Dorman had worked in IT for many years for private companies including Proctor & Gamble was appointed Director of the Madison County IT Department in December 2016 and confirmed by a vote of the county board. Prenzler promised to eliminate prohibited political activity in County offices.

26. Defendant Madison County Prosecutor, Gibbons was appointed State's Attorney in November 2010 to fill the vacancy created by State's Attorney Bill Mudge who was elected to the Judiciary in 2010 but had previously been appointed State's Attorney in 2002 after then State's Attorney Bill Haine was elected State Senator; Gibbons was re-elected as Madison County State's Attorney in 2016. Gibbons is a Democrat and aspired to lead the county Democratic Party, and this change did not sit well with him and there began to be friction from those Democratic employees of the County to the changes implemented by Prenzler.

27. In 2017, a former employee of Gibbons, Andrew Kane sued him in United States District Court for violations of Title VII of the Civil Rights Act, including, but not limited to, Retaliation. Kane had submitted a Freedom of Information Act ("FOIA") request to the Madison County Board Administration and the Madison County State's Attorney's Office. The FOIA was provided by Board FOIA officer Cynthia Ellis and Chris Bethel of the IT department by accessing email to comply with the FOIA request. Ellis responded to Kane's FOIA request on

July 20, 2017, providing Kane with responsive records while on July 27, 2017, Assistant State's Attorney Jeffrey Ezra responded to the same request claiming there were no responsive records.

28. The release of public records upset Gibbons as the emails caused him difficulties in that case, and the contents of the documents revealed campaign fundraising in his office and unethical behavior by his employees. He complained that this was an improper FOIA disclosure. The Illinois Attorney General became involved in this case after Jeff Ezra requested that Kane return the records produced by Ellis, claiming they were provided in error. Assistant Attorney General Edie Steinberg found in Kane's favor that the records were, in fact, public records and that the Gibbons office had failed to conduct a proper search for records and an untimely response when they claimed there were no responsive records. To further upset Gibbons the fundraising and campaigning in his office was reported in the press garnering a front-page headline '*Emails that Gibbons sought to suppress promised free beer for – 2012 Haine fundraiser*' indicating improper political activity was endemic through multiple State's Attorney offices including his own published January 16, 2018, six days after the well-publicized January 10th, 2018, raid on Dorman and Hulme's offices.

29. Dorman, upon becoming IT Director discovered that the previous County Administrator, Joe Parente, and the previous County Executive, Dunstan had deleted their computer hard drives which was improper and illegal. Dorman had the deleted data revived by an NSA contractor which revealed word documents and excel spreadsheets as email attachments concerning illegal fundraising which was reported to Hulme and Prenzler. The deleting of the hard drives also required Hulme, in an effort to manage the continuing operations of the county, to request emails of Alan Dunstan, Joe Parente, and Administrative Services Director Barry Harris and others so as to know the status of the county's affairs and current projects that were in

progress. Both Barry Harris and Joe Parente had separated with the county and held critical county positions. In an effort to see what activities and pressing matters were at hand during the change over to the new office under Prenzler, Hulme discovered political fundraising and specifically Barry Harris, on county time, with county equipment, scheduling elaborate political fundraisers for Alan Dunstan's political campaign at Argosy Casino in Alton, IL via county email. These emails and the deleted hard drives added to the suspicion that there was potentially more political activity existing in multiple elected offices including taxpayer funded systems, equipment and personnel throughout the county.

30. Hulme also, prior to taking over, saw Dunstan dumping stacks of papers into a recycling bin. Later, Hulme looked at these papers and saw hundreds of pages of political election and campaign materials, further proof that over the years improper campaigning had been done from Madison County offices. Hulme also saw firsthand the Chief deputy Auditor Jennifer Zoelzer, who worked for Democrat Auditor Rick Faccin, rolling a large cart full of Re-elect Faccin campaign materials from inside the county administration building including leaflets, signs, and candy, presumably going to parade being held that weekend, during work hours. Hulme witnessed this firsthand because he held the door for Zoelzer as she wheeled the prohibited campaign material out of the county building. Hulme was also told, by a witness who had firsthand knowledge of the Sheriff Deputies running a campaign calling center in the county jail and had said that political campaigning was commonplace in the county public defender's office.

31. Hulme continued to receive evidence and reports of political and unethical activity throughout the county including that the county purchasing department was using one vendor for 95% of their purchases and had a competing vendor meet with him to discuss

unethical and potentially illegal purchasing practices in the county, including kickbacks and free MLB Cardinals tickets to those in county purchasing. This information prompted Hulme to look at the emails of the purchasing department which led to finding unethical activities and prohibited political messaging between Democrat Party members on county time. A broader search found Democrat precinct committeemen correspondence throughout the county email system and fundraising requests. The revelations in the purchasing department led to a personal reshuffling and contracting with an outside auditing team with Sikitch, LLP (hereinafter “Sikitch”), a decision approved by the county board Finance Committee. Skitch was to look at various issues across the county for ideas to improve processes and compliance with policy and best business practices. The purchasing revelations were grounds to do a broader search for prohibited political activity, kickbacks, and unethical business practices, which included looking for keywords on the county email archive.

32. Hulme provided Sikitch with the necessary county emails for them to evaluate the issues of prohibited political activity in the county, which required him to do a general search of the county email system to which he was clearly authorized by county policy. It was found that Defendant Bill Mudge and his wife Defendant Jennifer Mudge, formerly Jennifer Vucich (hereinafter Jennifer Mudge) and ex-wife of task force commander David Vucich whom they share children, were doing political activity, campaigning, and fundraising in the Madison County State’s Attorney Office with the help of county employees, such as Shannon Goforth. Dorman’s involvement in these searches never involved him looking at any emails, but issues faced by Hulme in researching the problem were discussed with Dorman, Adler and Prenzler.

33. Further, in 2017, Hulme’s tried to expose past prohibited political activity and further to stop it from continuing. Hulme informed and discussed the issue at length on multiple

occasions with Prenzler and many County Board members and some department heads. The County Board seemed to be unwilling to tackle these issues, and it was Hulme's conclusion that if the board would not do its job, then the next best option was to inform as many key individuals as possible about his looking into prohibited political activity in hopes that the prohibited political activity and unethical behavior would stop because Hulme was aware of the wrongdoing. Hulme and Prenzler talked to many county board members and department heads, including in meetings about the issues of prohibited political activity and unethical activities and Prenzler went so far as to inform Gibbons who declined to do anything. Prenzler and Hulme had multiple discussions with the outside contractor Sikitch and even the county outside CPA firm Scheffel and Company.

34. Sikitch, whom Prenzler and the Madison County Board hired was given these emails and they agreed with Hulme and advised that if Gibbons did not want to charge anyone with a crime, there was nothing that could be done here, meaning Hulme's communication of the issue to key county individuals was the county's best option. Basically, the strategy was to just get it to stop. In that attempt to inform and to prevent the prohibited political activity and unethical behavior Hulme met with Madison County Treasurer Chris Slusser to discuss the matter. Hulme informed Slusser of some of what he had found and knowing Slusser was a known informant, and had close connections with county Democrats, Hulme figured Slusser would get the message out that Hulme was aware of the prohibited political activity and it needed to stop. Slusser questioned Hulme on how he knew this activity was going on, and Hulme said he had access to emails. Hulme told Slusser a current sitting judge had been using county personnel and county resources to campaign, fundraise and to do political activity. Slusser made assumptions that Hulme was looking into Judges' emails, what Slusser had failed to realize is

that this activity Hulme was referring too was conducted in the State's Attorney Office when this current judge was State's Attorney, which was subject to the Illinois Freedom of Information Act and that all of this information Hulme referred to was considered public information. Slusser failed to ask specifics and it never occurred to Hulme that Slusser would eventually misrepresent his words.

35. Slusser took this information from Hulme and instead used it to curry favor with the Democrats and to spread false allegations that Hulme was looking at judicial emails and that the Prenzler administration was breaking the law. Slusser met with many county officials to spread this false narrative and met multiple times with Defendant State's Attorney Tom Gibbons who was too eager to use these allegations by Chris Slusser. At no time did Slusser have any evidence other than his own words and spin on the conversations with Hulme. It is believed that Slusser agreed to write an affidavit to Gibbons about the matter, and Gibbons proceeded to form a Grand Jury based on Slusser's spin of Hulme's conversation and included his spin on multiple initiatives by the Prenzler administration such as GPS tracking of vehicles and the consolidation of printing services, both efforts were to save the county money and to bring forward best business practices to the county.

36. Defendant Slusser also retold a story to Gibbons that was third hand that from Deputy Treasurer Patrick McRea, that Prenzler, Hulme, and Deputy Administration Stephen Adler tried to bribe Congressman John Shimkus to make Don Weber a US Attorney in the Southern District of Illinois, with no evidence, just unsubstantiated rumor.

37. During late 2017 petitions were being gathered for precinct committeemen of both political parties so that they could appear on the ballot in the 2018 Illinois primary election. Precinct committeemen are elected in each precinct and vote for the county chairman of the local

party in Illinois. Defendant Chris Slusser was the former Republican Chairman of the Madison County Republican Party and liked to flaunt that he handpicked the current Chairman Jeremy Plank and would choose the next Chairman. Slusser was organizing his own slate of precinct committeeman against Prenzler's slate. Kurt Prenzler was pushing to be the next Republican Chairman of the Madison County Republican Party and Slusser knew this. The Chairman of the local Republican Party has considerable power and resources to fund campaigns and influence elections. Slusser along with Republican County board members Lisa Ciampoli, Ray Wesley, Tom McRea, Jamie Goggin, Erica Harriss and others opposed Prenzler's push for Republican Party Chairman. Lisa Ciampoli was running for precinct committeeman against Dorman's father in Collinsville, IL and Ciampoli was very upset at this since Dorman's father supported Prenzler. Ciampoli threatened Dorman's job to Hulme, and during the time petitions are turned into the Madison County Clerk's Office, Ciampoli accused Rob Dorman of acting inappropriately when Ciampoli filed her petitions for precinct committeeman. Ciampoli accused Rob of snatching her petition papers from her hands and inappropriately monitoring her whereabouts on the county video camera system. Both of those allegations were provably false and those pushing the false premise knew it to be false. The 'incident' was recorded by the County Clerk security video system and proved conclusively that Dorman did not touch her papers, yet that rumor was intentionally used to discredit Dorman and to get him fired and was the basis for involving Dorman in the task force investigation through sworn affidavit. Dorman did not have access to the county video system, so he was clearly unable to watch it. That did not stop this group as described, from claiming Dorman had acted inappropriately and worked to keep the video camera recording of the County Clerk's Office secret in Freedom of Information Act requests that were denied for the videotape proving Dorman's innocence. Subsequently these false



allegations were combined with other allegations by Rick Faccin and his Chief Deputy Auditor Jennifer Zoelzer that Dorman had violated the county purchasing policy and was inappropriately accessing the county financial system under the auditor. These false accusations were a pattern of an organized effort to discredit Dorman and Hulme and to get them terminated. Later Slusser and the other Republican County Board members would use the task force investigation as a reason not to support Prenzler for Madison County Republican Chairman since his administration was being investigated. Prenzler would lose the race for party chairman to Slusser's pick.

38. After months of spreading rumors about the Prenzler administration in 2017 and while working with Tom Gibbons, Slusser organized an attempt to hurt the Prenzler's Administration, including Dorman and Hulme by organizing Mike Parkinson, Ray Wesley, Lisa Ciampoli and Tom Gibbons in an effort to bring an unsubstantiated claim made by Ciampoli on a small piece of paper to the December 18, 2017, meeting the Madison County Personnel Committee. At that time, a properly scheduled meeting went into an executive session where Ciampoli accused Dorman of acting inappropriately and using the video camera system in the county to spy, including in Ciampoli's filing. Working in concert with Ciampoli was Defendant Parkinson and Defendant Wesley who took the note by Ciampoli and gave it to Gibbons. Gibbons would include Ciampoli's statements in the grand jury for the subsequent task force. The grand jury that was formed never did return a true bill and no indictments were returned.

39. On or about January 3, 2018, Gibbons, and Assistant State's Attorney Crystal Uhe (hereinafter "Uhe") convened what he called a "Madison County Public Corruption Task Force" to investigate "allegations of probable official misconduct, possible bribery, and other potential charges". An agreement was presented and signed by all entities and persons present. There at

the meeting were Chief Jay Keeven and of Edwardsville, Chief Rich Miller of Granite City, Chief Steve Evans of Collinsville, Chief Jake Simmons and Deputy Chief Terry Buhs, Deputy Major Jeff Connor, Lt. David Vucich, Sgt. Brian Koberna, and Director Robert Rizzi of the Defendant Madison County Sheriff's Office, and Mark Dorion, Captain Billy Sons, and Major Joe Collins of the Illinois State Police.

40. Gibbons advised the group that Lisa Ciampoli and Defendant Chris Slusser, both Republicans provided Grand Jury testimony relating to this charge and that up to that time there were only rumors of illegal activity. Ciampoli stated that she was suspicious about how Dorman knew she was filing paperwork for running for committee precinct committeeman even though it was observed by many people including her eventual successor for the County Board Chris Guy who told Dorman she was filing, but she suspected that he was somehow monitoring her on Madison County security cameras during working hours. Defendant Slusser and/or Ciampoli testified that they felt that there was a plan a foot to put GPS devices and monitor employees through new printers which would allow computer hard drives to be monitored, both of which were discussed in various committees and voted upon by the county board. At this time Defendant Slusser, had been informed by Former States Attorney Don Weber that Madison County Email policy as found in the Madison County Personnel Policy Handbook, pages 43-48 allow access by the County Board Chairman, his County Administrator, or anyone else authorized by either of them unlimited access to emails stored on County Servers.

41. On the basis of Ciampoli and Defendant Slusser's testimony, Defendant Gibbons stated that it appeared that violations of Computer Tampering per *720 ILCS 5/17-51*, Bribery per *720 ILCS 5/33-1* Eavesdropping Statute per *720 ILCS 5/14 et. seq.* and Official Misconduct per *720 ILCS 5/33-3*.

42.. The leadership of the Task Force accepted a Memorandum of Understanding, and the following investigators were chosen. From the City of Alton Police, Peter Vambaketees and Patrick “PJ” Bennett were chosen. From the City of Collinsville, Sgt. Mark Krug was chosen. From the City of Edwardsville Police Department, Sgt. Mike Lybarger was chosen, and from the City of Granite City Police Department, Lt. Kenneth Wojtowicz, and Detective Jeff Donahey were chosen. From the Illinois State Police, Special Agent Dennis Janis was chosen, and from the Madison County Sheriff’s Office, Defendant Vucich and Sgt Brian Koberna were chosen for this investigation.

43. Beginning on January 4, 2018, said investigation began with the following interviews:

- A. Sgt. Brian Koberna of the Madison County Sheriff’s Department interviewed Greg Nihiser, a Madison County Maintenance Employee on January 4, 2018.
- B. Granite City Detective Jeff Donahey and Brian Koberna from Edwardsville Police Department interviewed Jeffrey S. Kochan the former Madison County Manager of Network Services at the Edwardsville Police Department on January 4, 2018.
- C. Granite City Police Department Lt. Kenneth Wojtowicz and Madison County Sheriff’s Office’s Defendant Vucich interviewed Thomas E. Hall, the former Madison County Computer System Administrator on January 4, 2018.
- D. Granite City Detective Jeff Donahey and Granite City Police Department Lt. Kenneth Wojtowicz interviewed Kyle Kielty, a former Madison County IT Department System Administrator on January 5, 2018.

- E. Edwardsville Police Department Sgt. Mike Lybarger and Illinois State Police Denis Janis interviewed John Doll, a former Network Administrator for Madison County, IL on January 5, 2018.
- F. City of Alton Police, Peter Vambaketees and Brian Koberna from Edwardsville Police Department interviewed Eric John Rein a Madison County Network Administrator on January 5, 2018.

44. On January 5, 2018, Madison County Sheriff's Office Sgt Brian Koberna obtained and executed a search warrant on computers located at 157 N. Main Street and the Madison County Sheriff's office, 405 Randle Street, Edwardsville, IL for the browsing histories of Robert Dorman, Douglas Hulme and Stephen Adler. Later on January 8, 2018 Madison County Sheriff's Office Sgt Brian Koberna obtained a search warrant for Doug Hulme's Hard drive. On January 5, 2018, members of the investigative team were advised of a "honeypot" ruse creation by Madison County Sheriff's Office's Defendant Vucich. Although they had a warrant granting root access of the entire network and thus Dorman and Hulme's computers, they failed to take even a cursory look for evidence of the allegations on Dorman and Hulme's computers, and failed to make an image of their hard drives which would have allowed for later inspection for evidence of the allegations because they knew the allegations were false or that Hulme was authorized by policy to protect the integrity of the county information systems. Additionally, they failed to confirm any of the network or system permission levels granted to Dorman which would have proven he did not have email admin rights or was in any group allowing access to the video surveillance system and only had basic office worker permissions.

45. Interviews then continued as follows:

- A. Sgt. Brian Koberna of the Defendant Madison County Sheriff's Department interviewed Matthew Collins Huntley, a Madison County information Technology Technician on January 7, 2018.
- B. Granite City Police Department, Detective Jeff Donahey interviewed Defendant Judge William Mudge on January 8, 2018.
- C. Granite City Police Department Lt. Kenneth Wojtowicz and Edwardsville Police Department Sgt. Mike Lybarger interviewed Defendant Gibbons on January 8, 2018, regarding the January 4, 2018, meeting of the task force and the *Andrew Kane* matter. He was subsequently interviewed again by Wojtowicz on January 9, 2018. He was again interviewed by Wojtowicz on January 23, 2018.
- D. City of Collinsville Sgt. Mark Krug and Illinois State Police Special Agent Denis Janis interviewed Defendant Christopher J. Slusser who was then the Madison County Treasurer on January 8, 2018.

46. On January 9, 2018, a search warrant was obtained by Edwardsville Sgt. Brian Koberna for Hulme's and Dorman's backups and an external hard drive was used on January 10, 2018, by Granite City's Jeffrey Donahey and Network Administrator Eric Rein of these requested backup files.

47. Also on January 9<sup>th</sup>, 2018, an overhear warrant was issued, and Chris Slusser wore a eavesdropping device to record a conversation with Hulme in his office. Dorman was asked to leave and was part of the subject of the recorded conversation along with the mail architecture. None of the members of the task force were certified Electronic Surveillance Communications Officers.

48. On January 10, 2018, Defendant Vucich obtained a Search Warrant for computer related equipment and documents associated with Cynthia Ellis' office, Steve Adler's office Chris Bethel's office and Robert Dorman's office. In addition to the members mentioned above on the Task Force, there were additional persons present from the Defendant Madison County Sheriff's Department, the Calhoun County Sheriff's Office, Patrick Parker, and additional persons from the Alton, Collinsville, Granite City and Edwardsville Police Department who conducted the seizure of said computer equipment and documents.

49. Interviews of persons continued as follows:

- A. On February 6, 2018, Illinois State Police Denis Janis and City of Alton Police Patrick (PJ) Bennett interviewed Cynthia Ellis is the Madison County Communication Director and sometime FOIA officer and her attorney Judge Ellar Duff.
- B. On January 10, 2018, Michael Lybarger of the Edwardsville Police and Sgt. Mark Krug of the Collinsville Police Department interviewed Defendant Chris Bethel who was the Manager of Network Services at Madison County on two separate occasions that day who agreed to cooperate with the task force after allegedly being mirandized for computer tampering and eavesdropping for unauthorized access to the State's Attorney email in providing the Kane FOIA.
- C. On January 23, 2018, Sgt. Mark Krug of the Collinsville Police Department and Sgt Brian Koberna of Edwardsville Police reinterviewed Defendant Chris Bethel with his attorney Clyde Kuehn and he was given immunity in exchange for agreeing to wear a wire to record Dorman in hopes of finding some type of

criminal activity by Dorman because after three weeks of investigating him the detectives still had found no evidence of any criminality on his behalf.

- D. On January 10, 2018, Granite City Police Detective Donahey and City of Alton Police Patrick (PJ) Bennett interviewed Andrew Esping Project Manager of the Madison County IT Department.
- E. On January 10, 2018, Madison County Sheriff's Office, Defendant Vucich interviewed Chris David Milton who is the union president for ASFCME and is employed by the Madison County Government. When Milton complained of the non-disclosure agreement, Vucich told him he and the other detectives also to sign it, and it was the first time in 20 years of law enforcement that he had to.
- 50. On January 10, 2018 Granite City Police Department Lt. Kenneth Wojtowicz executed a search warrant for the Madison County IT Department which included many computers laptops and data.
- 51. On January 11, 2018 Sgt. Mark Krug of the Collinsville Police Department and Special Agent Denis Janis of the Illinois State Police interviewed Jennifer J. Zoelzer, the Chief Deputy of the Madison County Auditor's office. There was a follow up interview with Jennifer J. Zoelzer on January 16, 2018.
- 52. On January 11, 2018, Edwardsville Police Department detective Sgt. Michael Lybarger and Illinois State Police Special Agent Dennis Janis conducted an interview of Madison County Assistant States Attorney Jeff Ezra.
- 53. On January 16, 2018, Granite City Police Detective Donahey and City of Alton Police Patrick (PJ) Bennett interviewed Madison County Auditor Rick Faccin.

54. On March 8, 2018, Granite City Police Detective Jeff Donahey obtained the minutes and audio of the Madison County Finance and Government Operations Committee for July 12, 2017.
55. On January 10, 2018, Illinois State Police Special Agent Dennis Janis and Granite City Police Detective Donahey interviewed Clint Jones, an elected member of the Madison County Board.
56. On January 10, 2018, Sgt Brian Koberna of Edwardsville Police executed a search warrant on the office of Robert Dorman and Douglas Hulme and computers were seized and analyzed.
57. On January 12, 2017, Granite City Police Department Lt. Kenneth Wojtowicz presented a FOIA request to Jeff Ezra of the Defendant Madison County State's Attorney's office for the FOIA log and all FOIAs received by the State's Attorney Office for 12/1/16 to 1/12/18.
58. On January 26, 2018, Edwardsville Police Department detective Sgt. Michael Lybarger sent and received a preservation request that was sent to Apple and Google and Microsoft for accounts pertaining to Plaintiff Robert Dorman and his spouse Kotomi Dorman. Later they would also search Dorman's 10-year-old son's iCloud account without a search warrant.
59. On January 27, 2018, Sgt. Mark Krug of the Collinsville Police Department and Illinois State Police Special Agent Dennis Janis interviewed Lisa A. Ciampoli.
60. On January 12, 2018, Sgt Brian Koberna of Edwardsville Police obtained a search warrant for the Cell Phone Records of Chris Bethel and they conducted an analysis of the Bethel's SMS data on a particular date.



61. On January 12, 2018, Sgt Brian Koberna of Edwardsville Police obtained a search warrant for the Cell Phone Records of Robert Dorman and they conducted an analysis of the Dorman's SMS data on a particular date
62. On January 17, 2018, Madison County Sheriff's Office, Defendant Vucich interviewed Judge David Hylla over the phone.
63. On January 18, 2018, Madison County Sheriff's Office, Defendant Vucich interviewed Robert Falk the Superintendent of the Special Services area 1.
64. On January 30, 2018, Sgt Brian Koberna of Edwardsville Police executed a search warrant on the office of Andrew Esping and a computer was seized and analyzed.
65. On February 26, 2018, Edwardsville Police Department detective Sgt. Michael Lybarger received from Apple the records relating to Robert Dorman's spouse, Kotomi Dorman, and his 10-year-old son's iCloud account which was not included in any warrant but was downloaded and searched anyway, and both were turned over to Madison County Sheriff David Vucich.
66. On January 23, 2018, Edwardsville Police Department detective Sgt. Michael Lybarger conducted a forensic exam of Chris Bethel's Cell Phone.
67. At an unknown date Granite City Police Department Ken Wojtowicz conducted analysis of various USB devices seized on January 11, 2018, and January 16, 2018.
68. At an unknown date Jeff Donahey conducted digital forensics extraction of Dorman's iPhone.
69. On January 23, 2018, Granite City Police Detective Donahey interviewed Tricia L. Lack who is the office manager for the Madison County IT Department.

70. On January 23, 2018, Illinois State Police Special Agent Dennis Janis interviewed Deb Dettmers and she did not make any statements.
71. On January 25, 2018, Madison County Sheriff's Office, Defendant Vucich interviewed Captain Eric Decker regarding various FOIA requests.
72. On January 25, 2018, Crystal Uhe of the Defendant Madison County States' Attorney Offices filed Miscellaneous Actions 18-MR-500127 & 128 which were for various search warrants that had been earlier granted and then she moved to seal and impound the Court file regarding the Grand Jury Investigation, Public Corruption Task Force as per same, and Judge Schroeder granted it for a period of 90 days. Eventually, there were additional orders keeping this matter sealed until April 6, 2020, when it was allowed to be unsealed.
73. On January 26, 2018, Sgt. Mark Krug of the Collinsville Police Department interviewed Vanessa L. Jones, a deputy clerk for the County Clerk Debbie Ming-Mendoza.
74. On January 26, 2018, Sgt. Mark Krug of the Collinsville Police Department and Sgt Mike Lybarger of the Edwardsville Police Department interviewed Debbie Ming Mendoza, Madison County Clerk.
75. On January 29, 2018, Sgt. Mark Krug of the Collinsville Police Department interviewed Sherry L. Price.
76. On January 29, 2018, Madison County Sheriff, Defendant Vucich focused on documents contained on a hard drive used by Douglas Hulme's by logging into his Ex-wife's Defendant Jennifer Mudge and her new husband Defendant Bill Mudge's county email accounts attempting to match the documents to their email

because there were no emails other than Hulme's on the drive. Vucich's report states he found an email from "*William Mudge to Jennifer Mudge stating in the body "Found this when trying to locate your precinct letter. LOL."*" indicating he was aware Defendant Mudge's were conducting prohibited political activity using county resources, which was ignored as criminal activity.

77. On January 29, 2018, and April 6, 2018, Madison County Sheriff's Defendant Vucich interviewed John Rekowski who is the head public defender for Madison County.
78. On January 29, 2018, Granite City Police Department Ken Wojtowicz interviewed Defendant Jennifer Mudge,
79. On January 30, 2018, Sgt. Mark Krug of the Collinsville Police Department interviewed Robert N. Henke who was the "phone guy" for the Madison County IT Department.
80. On January 30, 2018, Granite City Police Detective Jeff Donahey interviewed Jewel Kochan at her home in Edwardsville, IL.
81. On January 30, 2018, Granite City Police Detective Jeff Donahey interviewed Paula Walker of the Madison County State's Attorney's Office.
82. On January 25, 2018, Madison County Sheriff's Defendant Vucich interviewed attorney Heidi Eckert who is an attorney for the Madison County Sheriff's office.
83. On January 30, 2018, Granite City Police Department Ken Wojtowicz did a conference call with Bill Brown, Sheldon Butler, and Sgt Brian Koberna of Edwardsville Police regarding USL Financial System.

84. On January 30, 2018, Illinois State Police Special Agent Dennis Janis interviewed Michelle Brooks of the Madison County Health Department.
85. On January 30, 2018, Madison County Sheriff's Defendant Vucich obtained and executed a search warrant at Andrew Esping's Office.
86. On January 31, 2018, Edwardsville Police Department Detective Mike Lybarger interviewed Samuel S. Borders, an employee of the Madison County Community Development Department.
87. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Chris Slusser that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear has not been disclosed to Dorman and Hulme. However, it was as will be alleged later improperly disclosed inappropriately and unlawfully to persons not authorized to hear same.
88. On February 1, 2018, Madison County Sheriff's Defendant Vucich interviewed Don Weber.
89. On January 25, 2018, Madison County Sheriff's Defendant Vucich requested a transcript from the Liz Dalton Petition hearing of the Madison County Electoral Board from ASA Crystal Uhe.
90. On February 1, 2018, Edwardsville Police Department Detective Mike Lybarger called to interview Plaintiff Robert Dorman. Later his attorney, Ed Moorman advised that he would not be making a statement.

91. On February 1, 2018, Edwardsville Police Department Detective Mike Lybarger called to interview Plaintiff Douglas Hulme. Later Hulme advised that he would not be making a statement.
92. On February 1, 2018, Madison County Sheriff's Defendant Vucich contacted Madison County Board Chairman Kurt Prenzler and it was agreed that he would be interviewed on February 2, 2018, which was done.
93. On January 30, 2018, Illinois State Police Special Agent Dennis Janis contacted Steven Adler and he informed him that he would not participate in an interview.
94. On January 30, 2018, Illinois State Police Special Agent Dennis Janis contacted John Thompson, and he informed him that he would not participate in an interview.
95. On February 1, 2018, Sgt. Mark Krug of the Collinsville Police Department contacted Michael Ufert and he declined to be interviewed.
96. On February 2, 2018, Edwardsville Police Department Detective Mike Lybarger contacted Bruce Cooper about an interview.
97. On February 6, 2018, Sgt. Mark Krug of the Collinsville Police Department contacted Travis L. Williams of Ace Tech Computer Services, Inc. and interviewed him.
98. On February 27, 2018, Crystal Uhe of the Defendant Madison County States Attorney Offices filed Miscellaneous Actions 18-MR-500278, 279 & 280 which were for various search warrants that had been earlier granted and then she moved to seal and impound the Court file regarding the Grand Jury Investigation, Public Corruption Task Force as per same, and Judge Schroeder granted it for a period of

90 days. Eventually, there were additional orders keeping this matter sealed until April 6, 2020, when it was allowed to be unsealed by the Madison County Circuit Court.

99. On March 12, 2018, Sgt Brian Koberna of Edwardsville Police reviewed potential artifacts from Mail Store Server.
100. On May 1, 2018, and May 2, 2018, Madison County Sheriff Defendant Vucich contacted Ocularis ONSSI regarding the software for the Ocularis viewing software integration for the security cameras owned by the Sheriff's Office.
101. On February 7, 2018, Granite City Police Department Ken Wojtowicz spoke with Harold Wathan about a FOIA request.
102. On March 5, 2018, and March 9, 2018, Madison County Sheriff's Defendant Vucich interviewed Karen Marie Zimmerman, the second time with Sgt Brian Koberna of Edwardsville Police.
103. On March 28, 2018, Granite City Police Department Ken Wojtowicz interviewed Linda K. Ogden who worked for Madison County Government.
104. On March 14, 2018, Madison County Sheriff's Defendant Vucich interviewed Kurt Michael Geschwend, a member of the maintenance department of Madison County.
105. On March 14, 2018, Madison County Sheriff's Defendant Vucich interviewed Bethany Ann Behrhorst,
106. On March 16, 2018, Madison County Sheriff's Defendant Vucich interviewed Mark Anthony von Nida, the elected Madison County Circuit Clerk,

107. On March 20, 2018, Granite City Police Detective Jeff Donahey obtained and executed a search warrant for Robert Dorman's cell phone.
108. On April 3, 2018, Granite City Police Department Ken Wojtowicz contacted Jennifer Zoelzer, Rick Faccin, Jeff Connor, Joe Halbrooks, Joshua Whitecotton, Steve Nonn, Roger Smith, Tim Gibbons, Robert Daiber, and Molly Schroader.
109. On April 5, 2018, Jeff Ezra contacted Madison County Sheriff's Defendant Vucich regarding Robert Dorman and discussed the Madison County Employees Procedure on E-mails.
110. On April 9, 2018, Robert Dorman reported to the Madison County Sheriff's Office suspicious activity in his office, and it was investigated and now believed by Dorman to have been conducted by Chris Bethel as part of his immunity to search for something usable against Dorman.
111. The investigation continued with the additional futile and wasteful interviews in this matter as follows:
  - A. On October 2, 2018, Madison County Sheriff Defendant Vucich interviewed former County Administrator Joe Parente on the handling of FOIA requests.
  - B. On November 6, 2018, Madison County Sheriff Defendant Vucich and Brian Kobema interviewed former IT employee Barbara Hentz and discussed the departments' FOIA practice.
  - C. On November 6, 2018, Madison County Defendant Vucich and Deputy Brian Kobema met with former IT Director, Patrick J. Morrison Sr. at his residence about email administrative rights.

- D. On November 7, 2018, Madison County Sheriff Defendant Vucich and Deputy Brian Kobema met with Teri Picchoildi regarding record keeping of the judiciary as it pertains to the Madison County Electronic Communications Policy.
- E. On November 8, 2018, Madison County Sheriff Defendant Vucich interviewed former IT Director Timothy Renick about previous IT policies.
112. On May 10, 2018, Crystal Uhe of the Defendant Madison County States Attorney Offices filed Miscellaneous Actions 18-MR-500597, 598 & 599 which were for various search warrants that had been earlier granted and then she moved to seal and impound the Court file regarding the Grand Jury Investigation, Public Corruption Task Force as per same, and the Judge granted it for a period of 90 days. Eventually, there were additional orders keeping this matter sealed until April 6, 2020, when it was allowed to be unsealed by the Madison County Circuit Court.
113. At some point, the Plaintiffs by their then counsel, Ed Moorman filed a Motion to Remove Defendant Gibbons as the Prosecutor running this investigation because in fact he was and is a witness to same. The Madison County Circuit Court Chief Judge Hylla determined that an out of county judge should be appointed to hear whether there to be a conflict of interest with Thomas Gibbons continuing the run the prosecution and eventually Judge Jerry Crisel from Jefferson County was appointed to hear that Motion and he granted it in 2019, and he ruled that



someone else would have to be appointed as a special prosecutor. Eventually, the Illinois Attorney General, Kwame Raoul was so appointed.

114. Attorney General Kwame Raoul determined after hearing the evidence that had been assembled by the special task force that there was insufficient evidence to support charges against any of the potential targets. Upon information and belief, Plaintiffs state that this was a “witch hunt” in that Dorman and Hulme were accused of doing criminally what they had the obligation and the right to do under the authority of the Madison County Electronic Communications Policies and Procedures. There literally was no credible evidence that they had violated any laws, or Madison County policies, and further this was known by all of member herein described in the so-called task force.
115. As indicated, the affidavits from this task force were released per the Court’s order of April 6, 2020. However no Grand Jury investigative materials were released by the order, and per Illinois law, the Slusser overhear previously referred to was not released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members in violation of Illinois law.
116. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or all of them in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

117. On April 16, 2020, at a special meeting of the Madison County Board, in which the meeting notice was not published in a newspaper of record 48 hours before the meeting as required by law and intentionally ignored, it fired Dorman and Hulme without the Chairman's approval, which was required by county policy, in part because of the disclosure to board members by the defendants of Grand Jury investigative materials and the Slusser overhear, and for the improper task force investigation as detailed above.

118. During that meeting County Board Members and Defendants, Ray Wesley, Tom McRea, Jamie Goggin, Erica Harriss, and Mike Parkinson were texting inappropriately throughout the April 16<sup>th</sup>, 2020 County Board meeting, in fact having a meeting within a meeting where the details of the termination of Dorman and Hulme were already decided and messages showed Slusser had already arranged the votes. The termination of Dorman and Hulme would be a major talking point of the Madison County Board Chairman campaign of Democrat Bob Daiber whom Slusser supported and helped to get elected. Republican county board members McRea, Goggin, Wesley, Harriss, Parkinson and County Auditor Faccin were against Prenzler's election in 2020 and knew this termination could damage Prenzler's campaign. Quotes attributed to Slusser would later be used on Daiber's campaign material against Prenzler, demonstrating the termination of Dorman and Hulme was based on politics, not substance.

119. Since the April 15<sup>th</sup> and 16<sup>th</sup>, 2020 County Board meeting and termination of Dorman and Hulme the executive sessions of those meetings have remained closed and withheld from the public, even after numerous Freedom of Information requests and an ongoing lawsuit. During the termination and subsequently no evidence of wrongdoing has been provided to justify the termination of Dorman and Hulme.

**COUNT I--TORTIOUS INTERFERENCE AGAINST  
MADISON COUNTY, ILLINOIS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count I of their Complaint against Defendant Madison County, Illinois for tortious interference of contract states the following:

120. Plaintiffs reallege Paragraphs 1-119 as if fully set forth herein.

121. Defendant Madison County, Illinois acted by its servants, agents and employees as detailed above and is liable for their actions under the theory of respondeat superior.

122. Plaintiffs as previously alleged had a contract of employment with Madison County, that each Defendant and their agents, servants and employees were aware of.

123. Defendant Madison County, Illinois by its agents, servants and employees involved in the task force knew that it was premised on a false premise as they knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

124. Further, the Defendant Madison County, Illinois by its agents, servants and employees knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically they knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

125. That Madison County intentionally violated state law, county ordinances, policies and procedures to terminate Plaintiffs Dorman and Hulme, insofar as to ignore the County Board Chairman Kurt Prenzler's "no" vote on their April 16<sup>th</sup>, 2020 termination when a termination

required both the county board and the county board chairman's approval to which the State's Attorney gave a public legal opinion that "and means or" in interpreting the county ordinance on department head terminations.

126. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count I in excess of \$50,000 each against the Defendant Madison County, Illinois, and for their costs herein expended.

**COUNT II---TORTIOUS INTERFERENCE AGAINST DAVID VUCICH, JOHN D. LAKIN AND JEFF CONNOR**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count II of their Complaint against Defendant Vucich, John D. Lakin, and Jeff Connor for tortious interference of contract states the following:

127. Plaintiffs reallege Paragraphs 1-126 as if fully set forth herein.

128. Plaintiffs as previously alleged had a contract of employment with Madison County, and that Madison County Sheriff employees, Defendants Vucich, Lakin and Connor were aware of.

129. Defendants Vucich, Lakin and Connor were involved in the task force and they knew that it was premised on a false premise as they knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

130. Further, the Defendant Vucich, Lakin and Connor knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically they knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

131. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count II in excess of \$50,000 each against the Defendants Vucich, Lakin and Connor and for their costs herein expanded.

**COUNT III---TORTIOUS INTERFERENCE AGAINST CHRIS SLUSSER, RICK FACCIN, BOB DAIBER, PATRICK MCREA CHRIS BETHEL AND JENNIFER ZOELZER**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count III of their Complaint against Defendants Slusser, Faccin, Daiber, McRea, Bethel and Zoelzer for tortious interference of contract states the following:

132. Plaintiffs reallege Paragraphs 1-131 as if fully set forth herein.

133. Plaintiffs as previously alleged had a contract of employment with Madison County, and that these Defendants were Madison County office holders, specifically Defendant Slusser, Faccin, Daiber, McRea, Bethel, and Zoelzer were aware of.

134. Defendant Slusser, Faccin, Daiber, McRea, Bethel, and Zoelzer were involved and affiliated in and participated, in part, with and in the task force and they knew that it was

premised on a false premise as they knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

135. Further, the Defendant Slusser, Faccin, Daiber, McRea, Bethel, and Zoelzer knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically they knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

136. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count III in excess of \$50,000 each against the Defendant Slusser, Faccin, Daiber, McRea, Bethel, and Zoelzer and for their costs herein expanded.

**COUNT IV---TORTIOUS INTERFERENCE AGAINST THOMAS GIBBONS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count IV of their Complaint against Defendant Gibbons for tortious interference of contract states the following:

137. Plaintiffs reallege Paragraphs 1-136 as if fully set forth herein.

138. Plaintiffs as previously alleged had a contract of employment with Madison County, and that Defendant Gibbons was aware of.

138. Defendant Gibbons was involved in the task force and he knew that it was premised on a false premise as he knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

139. Further, the Defendant Gibbons knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically he knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

140. Further, the Defendant Gibbons started the investigation, with Chris Slusser as his key witness, with a conflict of interest since he was the lawyer for Dorman and Hulme and was subsequently removed from the investigation by a judge by the filing of a lawsuit by Dorman and Hulme.

141. Further, the Defendant Gibbons met with county board members and county officials to spread false information and unsubstantiated rumors about Dorman and Hulme in an effort to get them terminated and to hurt the administration County Board Chairman Kurt Prenzler by creating the impression of a scandal and impropriety.

142. Further, the Defendant Gibbons tried to use a "honey trap" and "perjury trap" in county depositions in civil cases to attempt create evidence to use against Dorman and Hulme, or their boss Prenzler.

143. Further, the Defendant Gibbons used his office to give the county board misleading and knowingly false legal opinions in an effort to terminate Dorman and Hulme

including ignoring state law, county ordinances and county policy such as the requirement to post the county board meeting notice 48 hours before in a newspaper of record as required by state law and claiming that the county board did not need the county board chairman's permission to terminate Dorman and Hulme because "and means or" when interpreting county ordinances requiring the county board and the county chairman to consent in a termination of a department head or county administrator.

144. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count IV in excess of \$50,000 each against the Defendant Gibbons and for their costs herein expanded.

**COUNT V---TORTIOUS INTERFERENCE AGAINST RAY WESLEY, MIKE WALTERS, JAMIE GOGGINS, ERICA HARRISS, MIKE PARKINSON, TOM MCREA**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count V of their Complaint against Defendant Wesley, Walters, Goggins, Harriss, Parkinson, McRea for tortious interference of contract states the following:

145. Plaintiffs reallege Paragraphs 1-144 as if fully set forth herein.

146. Plaintiffs as previously alleged had a contract of employment with Madison County, and that the Defendants Madison County Board members, Wesley, Walters, Goggins, Harriss, Parkinson, McRea was aware of.

147. Defendant Wesley, Walters, Goggins, Harriss, Parkinson, McRea were involved in and participated in the task force, and/or participated in the Task Force, and they knew that it



was premised on a false premise as they knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiffs were not guilty of any crimes or violations.

144. Further, the Defendant Wesley, Walters, Goggins, Harriss, Parkinson, and McRea knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically they knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

145. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count V in excess of \$50,000 each against the Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea and for their costs herein expanded.

**COUNT VI--TORTIOUS INTERFERENCE AGAINST WILLIAM MUDGE**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count VI of their Complaint against Defendant William Mudge for tortious interference of contract states the following:

146. Plaintiffs reallege Paragraphs 1-145 as if fully set forth herein.

147. Plaintiffs as previously alleged had a contract of employment with Madison County, and that Defendant William Mudge was aware of.

148. Defendant William Mudge was involved and participated in the task force and he knew that it was premised on a false premise as he knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

149. Further, the Defendant William Mudge knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false accusations, and unsupported accusations of improper conduct, and specifically he knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

150. That said induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

151. Further, the Defendant William Mudge knew that Hulme had received access to his emails when he was Madison County State's Attorney, preceding Tom Gibbon in office, where he was communicating with county employees about politics, campaigning and fundraising, as well as ordering county employee Shannon Goforth to do prohibited political work on county time, with county recourses, including setting up a fundraiser and fundraising, and these activities also included his future wife Jennifer Vucich against the law and against county policy that Hulme and Dorman were in required to enforce, and she is the ex-wife of Detective David Vucich whom she shares children with and was the commander of the task force set to investigate and bring charges against Dorman and Hulme.

152. Further, the Defendant William Mudge continued to send requests to the State's Attorney Office for political work to be done when he left to become a Madison County Judge, including continuing to do prohibited political activity with Jennifer Vucich on county time and with county resources, against the law and against county policy that Hulme and Dorman were in required to enforce.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count VI in excess of \$50,000 each against the Defendant William Mudge and for their costs herein expanded.

**COUNT VII--TORTIOUS INTERFERENCE AGAINST JENNIFER MUDGE**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count VII of their Complaint against Defendant Jennifer Mudge for tortious interference of contract states the following:

153. Plaintiffs reallege Paragraphs 1-152 as if fully set forth herein.

154. Plaintiffs as previously alleged had a contract of employment with Madison County, and that Defendant Jennifer Mudge was aware of.

155. Defendant Jennifer Mudge was involved in the task force and she knew that it was premised on a false premise as he knew or should have known about the Madison County Electronic Communications Policies and Procedures, along with the Madison County State's Attorney Policy and Procedures, and that the Plaintiff were not guilty of any crimes or violations.

156. Further, the Defendant Jennifer Mudge knew that information from the task force was privileged and could if it was released cause harm to the contractual relationship, specifically the Grand Jury investigative materials and the Slusser overhear, and other false

accusations, and unsupported accusations of improper conduct, and specifically she knew it could cause the Madison County Board to terminate the aforementioned employment contracts with Plaintiffs Dorman and Hulme.

157. Further, the Defendant Jennifer Mudge, previously known as Jennifer Vucich the ex-wife of Detective David Vucich whom she shares children with and was the commander of the task force set to investigate and bring charges against Dorman and Hulme, knew that Hulme had received access emails of the State's Attorney where she was communicating with county employees about politics, campaigning and fundraising, as well as ordering county employee Shannon Goforth to do prohibited political work on county time, with county recourses, including setting up a fundraiser and fundraising against the law and against county policy that Hulme and Dorman were in required to enforce, while she was the First Assistant State's Attorney in charge of prosecuting violations of law in Madison County.

158. Further, the Defendant William Mudge continued to send requests to the State's Attorney Office and to Jennifer Mudge for political work to be done when he left to become a Madison County Judge against the law and against county policy that Hulme and Dorman were in required to enforce.

159. That induced termination of both Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits and reputation.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count VII in excess of \$50,000 each against the Defendant Jennifer Mudge and for their costs herein expanded.

**COUNT VIII---CIVIL REMEDY FOR VIOLATION OF THE EAVESDROPPING ACT**  
**720 ILCS 5/14.6 AGAINST MADISON COUNTY, ILLINOIS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count VIII of their Complaint against Defendant Madison County, Illinois for violations of the Eavesdropping Act, 720 ILCS 5/14.6 states the following:

160. Plaintiffs reallege Paragraphs 1-159 as if fully set forth herein.

161. There was in effect a statute which read as follows:

*§ 14-6. Civil remedies to injured parties. (1) Any or all parties to any conversation or electronic communication upon which eavesdropping is practiced contrary to this Article shall be entitled to the following remedies:*

*(a) To an injunction by the circuit court prohibiting further eavesdropping by the eavesdropper and by or on behalf of his principal, or either;*

***(b) To all actual damages against the eavesdropper or his principal or both;***

***(c) To any punitive damages which may be awarded by the court or by a jury;***

*(d) To all actual damages against any landlord, owner or building operator, or any common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned;*

*(e) To any punitive damages which may be awarded by the court or by a jury against any landlord, owner or building operator, or common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned.*

162. Further, the Eavesdropping statute spells out when it is contrary to the above statute in the following statute:

*§ 14-2. Elements of the offense; affirmative defense.*

*(a) A person commits eavesdropping when he or she knowingly and intentionally:*

*(1) Uses an eavesdropping device, in a surreptitious manner, for the purpose of overhearing, transmitting, or recording all or any part of any private conversation to which he or she is not a party*

*unless he or she does so with the consent of all of the parties to the private conversation;*

*(2) Uses an eavesdropping device, in a surreptitious manner, for the purpose of transmitting or recording all or any part of any private conversation to which he or she is a party unless he or she does so with the consent of all other parties to the private conversation;*

*(3) Intercepts, records, or transcribes, in a surreptitious manner, any private electronic communication to which he or she is not a party unless he or she does so with the consent of all parties to the private electronic communication;*

*(4) Manufactures, assembles, distributes, or possesses any electronic, mechanical, eavesdropping, or other device knowing that or having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious overhearing, transmitting, or recording of private conversations or the interception, or transcription of private electronic communications and the intended or actual use of the device is contrary to the provisions of this Article; or*

*(5) Uses or discloses any information which he or she knows or reasonably should know was obtained from a private conversation or private electronic communication in violation of this Article, unless he or she does so with the consent of all of the parties.*

163. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Chris Slusser (hereinafter referred to as “Slusser overhear”) that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear was and has not been disclosed to Dorman and Hulme. However, it was and will be alleged later improperly disclosed inappropriately and unlawfully to persons not authorized to hear same.

164. As indicated the affidavits from this task force were released per the Court’s order of April 6, 2020. However, per Illinois law, the Slusser overhear previously referred to was not

part of any of the materials that were released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members in violation of Illinois law.

165. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or all of the Defendants including members, employees, agents and servants of the Defendant Madison County in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

166. On April 16, 2020, at a special meeting of the Madison County Board, it fired Dorman and Hulme in part because of the aforementioned Slusser overhear, and for the improper task force investigation as detailed above.

167. This improper Slusser overhear is compensable under 720 ILCS 5/14.6 for both compensatory and punitive damages in that it was improperly disclosed as above stated per 720 ILCS 5/14.2

168. The result of said improper release of the Slusser overhear was that it caused the termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

169. Further, it was improperly released to members of the Madison County Board in a willful and wanton manner, and as such, Plaintiffs are entitled to punitive damages.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment against the Madison County, Illinois in Count VIII in their favor in an amount over \$50,000 by

the jury the trier of fact and for any other orders just in the premises including their costs herein expended

**COUNT IX--CIVIL REMEDY FOR VIOLATION OF THE EAVESDROPPING ACT  
720 ILCS 5/14.6 AGAINST DAVID VUCICH, JOHN D. LAKIN, AND JEFF CONNOR**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count IX of their Complaint against Defendant Vucich, Lakin and Connor for violations of the Eavesdropping Act, 720 ILCS 5/14.6 states the following:

170. Plaintiffs reallege Paragraphs 1-169 as if fully set forth herein.

171. There was in effect a statute which read as follows:

*§ 14-6. Civil remedies to injured parties. (1) Any or all parties to any conversation or electronic communication upon which eavesdropping is practiced contrary to this Article shall be entitled to the following remedies:*

*(a) To an injunction by the circuit court prohibiting further eavesdropping by the eavesdropper and by or on behalf of his principal, or either;*

*(b) To all actual damages against the eavesdropper or his principal or both;*

*(c) To any punitive damages which may be awarded by the court or by a jury;*

*(d) To all actual damages against any landlord, owner or building operator, or any common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned;*

*(e) To any punitive damages which may be awarded by the court or by a jury against any landlord, owner or building operator, or common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned.*

172. Further, the Eavesdropping statute spells out when it is contrary to the above statute in the following statute:

*§ 14-2. Elements of the offense; affirmative defense.*



*(a) A person commits eavesdropping when he or she knowingly and intentionally:*

*(1) Uses an eavesdropping device, in a surreptitious manner, for the purpose of overhearing, transmitting, or recording all or any part of any private conversation to which he or she is not a party unless he or she does so with the consent of all of the parties to the private conversation;*

*(2) Uses an eavesdropping device, in a surreptitious manner, for the purpose of transmitting or recording all or any part of any private conversation to which he or she is a party unless he or she does so with the consent of all other parties to the private conversation;*

*(3) Intercepts, records, or transcribes, in a surreptitious manner, any private electronic communication to which he or she is not a party unless he or she does so with the consent of all parties to the private electronic communication;*

*(4) Manufactures, assembles, distributes, or possesses any electronic, mechanical, eavesdropping, or other device knowing that or having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious overhearing, transmitting, or recording of private conversations or the interception, or transcription of private electronic communications and the intended or actual use of the device is contrary to the provisions of this Article; or*

*(5) Uses or discloses any information which he or she knows or reasonably should know was obtained from a private conversation or private electronic communication in violation of this Article, unless he or she does so with the consent of all of the parties.*

173. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Chris Slusser (hereinafter referred to as “Slusser overhear”) that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear was

and has not been disclosed to Dorman and Hulme. However, it was and will be alleged later improperly disclosed inappropriately and unlawfully to persons not authorized to hear same.

174. As indicated the affidavits from this task force were released per the Court's order of April 6, 2020. However, per Illinois law, the Slusser overhear previously referred to was not part of any of the materials that were released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members in violation of Illinois law.

175. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or all of the Defendants including members, Defendants Vucich, Lakin, and Connor in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

176. On April 16, 2020, at a special meeting of the Madison County Board, it fired Dorman and Hulme in part because of the aforementioned Slusser overhear, and for the improper task force investigation as detailed above.

177. This improper Slusser overhear is compensable under 720 ILCS 5/14.6 for both compensatory and punitive damages in that it was improperly disclosed as above stated per 720 ILCS 5/14.2

178. The result of said improper release of the Slusser overhear was that it caused the termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

179. Further, it was improperly released to members of the Madison County Board in a willful and wanton manner, and as such, Plaintiffs are entitled to punitive damages.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment against the Defendants Vucich, Lakin, and Connor in Count IX in their favor in an amount over \$50,000 by the jury the trier of fact and for any other orders just in the premises including their costs herein expended.

**COUNT X---CIVIL REMEDY FOR VIOLATION OF THE EAVESDROPPING ACT 720  
ILCS 5/14.6 AGAINST CHRIS SLUSSER**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count X of their Complaint against Defendant Chris Slusser for violations of the Eavesdropping Act, 720 ILCS 5/14.6 states the following:

180. Plaintiffs reallege Paragraphs 1-179 as if fully set forth herein.

181. There was in effect a statute which read as follows:

*§ 14-6. Civil remedies to injured parties. (1) Any or all parties to any conversation or electronic communication upon which eavesdropping is practiced contrary to this Article shall be entitled to the following remedies:*

*(a) To an injunction by the circuit court prohibiting further eavesdropping by the eavesdropper and by or on behalf of his principal, or either;*

*(b) To all actual damages against the eavesdropper or his principal or both;*

*(c) To any punitive damages which may be awarded by the court or by a jury;*

*(d) To all actual damages against any landlord, owner or building operator, or any common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned;*

*(e) To any punitive damages which may be awarded by the court or by a jury against any landlord, owner or building operator, or common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned.*

182. Further, the Eavesdropping statute spells out when it is contrary to the above statute in the following statute:

*§ 14-2. Elements of the offense; affirmative defense.*

*(a) A person commits eavesdropping when he or she knowingly and intentionally:*

*(1) Uses an eavesdropping device, in a surreptitious manner, for the purpose of overhearing, transmitting, or recording all or any part of any private conversation to which he or she is not a party unless he or she does so with the consent of all of the parties to the private conversation;*

*(2) Uses an eavesdropping device, in a surreptitious manner, for the purpose of transmitting or recording all or any part of any private conversation to which he or she is a party unless he or she does so with the consent of all other parties to the private conversation;*

*(3) Intercepts, records, or transcribes, in a surreptitious manner, any private electronic communication to which he or she is not a party unless he or she does so with the consent of all parties to the private electronic communication;*

*(4) Manufactures, assembles, distributes, or possesses any electronic, mechanical, eavesdropping, or other device knowing that or having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious overhearing, transmitting, or recording of private conversations or the interception, or transcription of private electronic communications and the intended or actual use of the device is contrary to the provisions of this Article; or*

*(5) Uses or discloses any information which he or she knows or reasonably should know was obtained from a private conversation or private electronic communication in violation of this Article, unless he or she does so with the consent of all of the parties.*

183. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Defendant Chris Slusser (hereinafter referred to as

“Slusser overhear”) that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order, was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear was and has not been disclosed to Dorman and Hulme. However, it was and will be alleged later improperly disclosed inappropriately and unlawfully to persons not authorized to hear same.

184. As indicated, the affidavits from this task force were released per the Court’s order of April 6, 2020. However, per Illinois law, the Slusser overhear previously referred to was not part of any of the materials that were released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members in violation of Illinois law.

185. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or Defendant Slusser in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

186. On April 16, 2020, at a special meeting of the Madison County Board, it fired Dorman and Hulme in part because of the aforementioned Slusser overhear, and for the improper task force investigation as detailed above.

187. This improper Slusser overhear is compensable under 720 ILCS 5/14.6 for both compensatory and punitive damages in that it was improperly disclosed as above stated per 720 ILCS 5/14.2

188. The result of said improper release of the Slusser overhear was that it caused the termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

189. Further, it was improperly released to members of the Madison County Board in a willful and wanton manner, and as such, Plaintiffs are entitled to punitive damages.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment against Defendant Slusser in Count X in their favor in an amount over \$50,000 by the jury the trier of fact and for any other orders just in the premises including their costs herein expended.

**COUNT XI---CIVIL REMEDY FOR VIOLATION OF THE EAVESDROPPING ACT**  
**720 ILCS 5/14.6 AGAINST THOMAS GIBBONS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XI of their Complaint against Defendant Thomas Gibbons for violations of the Eavesdropping Act, 720 ILCS 5/14.6 states the following:

190. Plaintiffs reallege Paragraphs 1-189 as if fully set forth herein.

191. There was in effect a statute which read as follows:

*§ 14-6. Civil remedies to injured parties. (1) Any or all parties to any conversation or electronic communication upon which eavesdropping is practiced contrary to this Article shall be entitled to the following remedies:*

*(a) To an injunction by the circuit court prohibiting further eavesdropping by the eavesdropper and by or on behalf of his principal, or either;*

*(b) To all actual damages against the eavesdropper or his principal or both;*

*(c) To any punitive damages which may be awarded by the court or by a jury;*

*(d) To all actual damages against any landlord, owner or building operator, or any common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned;*

*(e) To any punitive damages which may be awarded by the court or by a jury against any landlord, owner or building operator, or common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned.*

192. Further, the Eavesdropping statute spells out when it is contrary to the above statute in the following statute:

*§ 14-2. Elements of the offense; affirmative defense.*

*(a) A person commits eavesdropping when he or she knowingly and intentionally:*

*(1) Uses an eavesdropping device, in a surreptitious manner, for the purpose of overhearing, transmitting, or recording all or any part of any private conversation to which he or she is not a party unless he or she does so with the consent of all of the parties to the private conversation;*

*(2) Uses an eavesdropping device, in a surreptitious manner, for the purpose of transmitting or recording all or any part of any private conversation to which he or she is a party unless he or she does so with the consent of all other parties to the private conversation;*

*(3) Intercepts, records, or transcribes, in a surreptitious manner, any private electronic communication to which he or she is not a party unless he or she does so with the consent of all parties to the private electronic communication;*

*(4) Manufactures, assembles, distributes, or possesses any electronic, mechanical, eavesdropping, or other device knowing that or having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious overhearing, transmitting, or recording of private conversations or the interception, or transcription of private electronic communications and the intended or actual use of the device is contrary to the provisions of this Article; or*

*(5) Uses or discloses any information which he or she knows or reasonably should know was obtained from a private conversation*

*or private electronic communication in violation of this Article, unless he or she does so with the consent of all of the parties.*

193. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Defendant Chris Slusser (hereinafter referred to as “Slusser overhear”) that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear was and has not been disclosed to Dorman and Hulme. However, it was and will be alleged later improperly disclosed inappropriately and unlawfully to persons not authorized to hear same.

194. As indicated the affidavits from this task force were released per the Court’s order of April 6, 2020. However, per Illinois law, the Slusser overhear previously referred to was not part of any of the materials that were released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members in violation of Illinois law with the authorization of Defendant Gibbons.

195. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or Defendant Gibbons in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

196. On April 16, 2020, at a special meeting of the Madison County Board, it fired Dorman and Hulme in part because of the aforementioned Slusser overhear, and for the improper task force investigation as detailed above.



197. This improper Slusser overhear is compensable under 720 ILCS 5/14.6 for both compensatory and punitive damages in that it was improperly disclosed as above stated per 720 ILCS 5/14.2

198. The result of said improper release of the Slusser overhear was that it caused the termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

199. Further, it was improperly released to members of the Madison County Board in a willful and wanton manner, and as such, Plaintiffs are entitled to punitive damages.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment against Defendant Gibbons in Count XI in their favor in an amount over \$50,000 by the jury the trier of fact and for any other orders just in the premises including their costs herein expended.

**COUNT XII--CIVIL REMEDY FOR VIOLATION OF THE EAVESDROPPING ACT**  
**720 ILCS 5/14.6 AGAINST RAY WESLEY, MIKE WALTERS, JAMIE GOGGINS,**  
**ERICA HARRISS, MIKE PARKINSON, AND TOM MC REA**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XII of their Complaint against Defendants Wesley, Walters, Goggins, Harris, Parkinson, and McRea for violations of the Eavesdropping Act, 720 ILCS 5/14.6 states the following:

200. Plaintiffs reallege Paragraphs 1-199 as if fully set forth herein.

201. There was in effect a statute which read as follows:

*§ 14-6. Civil remedies to injured parties. (1) Any or all parties to any conversation or electronic communication upon which eavesdropping is practiced contrary to this Article shall be entitled to the following remedies:*

*(a) To an injunction by the circuit court prohibiting further eavesdropping by the eavesdropper and by or on behalf of his principal, or either;*

*(b) To all actual damages against the eavesdropper or his principal or both;*

***(c) To any punitive damages which may be awarded by the court or by a jury;***

*(d) To all actual damages against any landlord, owner or building operator, or any common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned;*

*(e) To any punitive damages which may be awarded by the court or by a jury against any landlord, owner or building operator, or common carrier by wire who aids, abets, or knowingly permits the eavesdropping concerned.*

202. Further, the Eavesdropping statute spells out when it is contrary to the above statute in the following statute:

*§ 14-2. Elements of the offense; affirmative defense.*

*(a) A person commits eavesdropping when he or she knowingly and intentionally:*

*(1) Uses an eavesdropping device, in a surreptitious manner, for the purpose of overhearing, transmitting, or recording all or any part of any private conversation to which he or she is not a party unless he or she does so with the consent of all of the parties to the private conversation;*

*(2) Uses an eavesdropping device, in a surreptitious manner, for the purpose of transmitting or recording all or any part of any private conversation to which he or she is a party unless he or she does so with the consent of all other parties to the private conversation;*

*(3) Intercepts, records, or transcribes, in a surreptitious manner, any private electronic communication to which he or she is not a party unless he or she does so with the consent of all parties to the private electronic communication;*

*(4) Manufactures, assembles, distributes, or possesses any electronic, mechanical, eavesdropping, or other device knowing that or having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious overhearing, transmitting, or recording of private conversations or the interception, or transcription of private electronic communications*

*and the intended or actual use of the device is contrary to the provisions of this Article; or*

*(5) Uses or discloses any information which he or she knows or reasonably should know was obtained from a private conversation or private electronic communication in violation of this Article, unless he or she does so with the consent of all of the parties.*

203. On February 1, 2018, City of Alton Police Patrick (PJ) Bennett discussed an overhear of either Dorman or Hulme by Defendant Chris Slusser (hereinafter referred to as “Slusser overhear”) that occurred on January 9, 2018. An overhear which is another term for an eavesdrop order was authorized by Judge Neil Schroeder. This meeting took place with either Dorman or Hulme at the Madison County Administration Building. To date this overhear was and has not been disclosed to Dorman and Hulme. However, it was and will be alleged later improperly disclosed inappropriately and unlawfully to persons including the Defendants Wesley, Walters, Goggins, Harris, Parkinson, and McRea not authorized to hear same.

204. As indicated, the affidavits from this task force were released per the Court’s order of April 6, 2020. However, per Illinois law, the Slusser overhear previously referred to was not part of any of the materials that were released as pursuant to Illinois law only those prosecuting or investigation the case, and the person conducting the overhear have the right to same. It is illegal for such overhears to be played for anyone else. But it was played for Madison County board members Defendants Wesley, Walters, Goggins, Harris, Parkinson, and McRea in violation of Illinois law with the authorization of Defendant Gibbons.

205. Plaintiffs alleged that based upon information and belief, that said Slusser overhear was played by one of the participants of this task force including City of Alton Police Patrick (PJ) Bennett or any of the other participant or Defendant Gibbons in the days leading up to the special meeting of the Madison County Board on April 16, 2020.

206. On April 16, 2020, at a special meeting of the Madison County Board, it fired Dorman and Hulme in part because of the aforementioned Slusser overhear, and for the improper task force investigation as detailed above.

207. This improper Slusser overhear is compensable under 720 ILCS 5/14.6 for both compensatory and punitive damages in that it was improperly disclosed as above stated per 720 ILCS 5/14.2

208. The result of said improper release of the Slusser overhear was that it caused the termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

209. Further, it was improperly released to members of the Madison County Board Defendants Wesley, Walters, Goggins, Harris, Parkinson, and McRea in a willful and wanton manner, and as such, Plaintiffs are entitled to punitive damages.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment against Defendants Wesley, Walters, Goggins, Harris, Parkinson, and McRea in Count XII in their favor in an amount over \$50,000 by the jury the trier of fact and for any other orders just in the premises including their costs herein expended.

**COUNT XIII—WHISTLEBLOWER CLAIM**  
**AGAINST DEFENDANT MADISON COUNTY ILLINOIS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XII of their Complaint against Defendant Madison County, Illinois for breach of the Whistle Blower Statute 740 ILCS 174/15 states the following:

210. Plaintiffs reallege Paragraphs 1-209 as if fully set forth herein.

211. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15 that states as follows:

**§ 15. Retaliation for certain disclosures prohibited.**

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*** (Empasis added)

212. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

213. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the

fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

214. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

215. This action by the Madison County Board was brought on by the actions of Madison County, Illinois' participation in the "Madison County Public Corruption Task Force" which as Plaintiffs have alleged was wrought with false and misleading information.

216. Both Dorman and Hulme have been fired as a result of the specific action of the Defendant Madison County, Illinois firing the Plaintiffs.

217. That the actions of Defendant Madison County as detailed above induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant Madison County, Illinois in Count XIII, and for their costs herein expended.

**COUNT XIV—CONSPIRACY WHISTLEBLOWER CLAIM**  
**AGAINST MADISON COUNTY, ILLINOIS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XIV of their Complaint against Defendant Madison County, Illinois for breach of the Whistle Blower Statute *740 ILCS 174/15* by way of a conspiracy states the following:

218. Plaintiffs reallege Paragraphs 1-217 as if fully set forth herein.

219. In the State of Illinois at all relevant times there was a statute *740 ILCS 174/15* that states as follows:

***§ 15. Retaliation for certain disclosures prohibited.***

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*** (Empasis added)

220. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment

and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

221. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

222. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as



detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

223. This action by the Madison County Board was brought on by the actions of Defendant Madison County, Illinois' participation in the "Madison County Public Corruption Task Force" which as Plaintiffs have alleged was wrought with false and misleading information as previously described which was produced as detailed above by employees of the City of Alton and which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect the four Defendants by their agents, servants and employees as described herein, and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

224. Both Dorman and Hulme have been fired as a result of the specific participation of the Defendant Madison County, Illinois, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with the other defendants and Madison County to further said conspiracy.

225. That said conspiracy induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count XIII in excess of \$50,000 each against the Madison County, Illinois, and for their costs herein expended.

**COUNT XV—CONSPIRACY WHISTLEBLOWER CLAIM**  
**AGAINST CHRIS SLUSSER, RICK FACCIN, JENNIFER ZOELZER, AND BOB**  
**DAIBER**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XV of their Complaint against Defendants Slusser, Faccin, Zoelzer, and Daiber for breach of the Whistle Blower Statute 740 ILCS 174/15 by way of a conspiracy states the following:

226. Plaintiffs reallege Paragraphs 1-225 as if fully set forth herein.

227. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15

that states as follows:

***§ 15. Retaliation for certain disclosures prohibited.***

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.** (Empasis added)*

228. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County

Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

229. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

230.. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois

law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

231. This action by the Madison County Board was brought on by the actions of Defendants Slusser, Faccin, Zoelzer, and Daiber participation in the “Madison County Public Corruption Task Force” which as Plaintiffs have alleged was wrought with false and misleading information as previously described which was produced as detailed above Defendants Slusser, Faccin, Zoelzer, and Daiber and which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect, the Defendants Slusser, Faccin, Zoelzer, and Daiber, and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

232. Both Dorman and Hulme have been fired as a result of the specific participation of the Defendant Chris Slusser, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with Defendant Chris Slusser, and Madison County to further said conspiracy.

233. That said conspiracy induced termination of both of the Plaintiffs’ employment contracts has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Slusser, Faccin, Zoelzer, and Daiber in Count XV, and for their costs herein expended.

**COUNT XVI—CONSPIRACY WHISTLEBLOWER CLAIM  
AGAINST DAVID VUCICH, JOHN LAKIN AND JEFF CONNOR**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XVI of their Complaint against Defendants Vucich, Lakin and Connor for breach of the Whistle Blower Statute 740 ILCS 174/15 by way of a conspiracy states the following:

234. Plaintiffs reallege Paragraphs 1-233 as if fully set forth herein.

235. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15 that states as follows:

***§ 15. Retaliation for certain disclosures prohibited.***

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*** (Empasis added)

236. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

237. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

238. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures

over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

239. This action by the Madison County Board was brought on by the actions of Defendants Vucich, Lakin and Connor's participation in the "Madison County Public Corruption Task Force" which as Plaintiffs have alleged was wrought with false and misleading information as previously described which was produced as detailed above by employees of the City of Edwardsville and which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect the all of the Defendants including Defendants Vucich, Lakin and Connor as described herein, and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

240. Both Dorman and Hulme have been fired as a result of the specific participation of Defendants Vucich, Lakin and Connor, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with the Defendants Vucich, Lakin and Connor and Madison County to further said conspiracy.

241. That said conspiracy induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Vucich, Lakin and Connor in Count XVI, and for their costs herein expended.

**COUNT XVII—CONSPIRACY WHISTLEBLOWER CLAIM**  
**AGAINST THOMAS GIBBONS**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XVII of their Complaint against Defendant Thomas Gibbons for breach of the Whistle Blower Statute 740 ILCS 174/15 by way of a conspiracy states the following:

242. Plaintiffs reallege Paragraphs 1-241 as if fully set forth herein.

243. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15 that states as follows:

***§ 15. Retaliation for certain disclosures prohibited.***

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*** (Empasis added)

244. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

245. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on



the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

246. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

247. This action by the Madison County Board was brought on by the actions of Defendant Thomas Gibbons' participation in the "Madison County Public Corruption Task

Force” which as Plaintiffs have alleged was wrought with false and misleading information as previously described which was produced as detailed above by employees of the City of Edwardsville and which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect the various Defendants including Thomas Gibbons as described herein, and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

248. Both Dorman and Hulme have been fired as a result of the specific participation of Defendant Thomas Gibbons, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with the Defendant Thomas Gibbons, and Madison County to further said conspiracy.

249. That said conspiracy induced termination of both of the Plaintiffs’ employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant Thomas Gibbons in Count XVII, and for their costs herein expended.

**COUNT XVIII—CONSPIRACY WHISTLEBLOWER CLAIM**  
**AGAINST WILLIAM MUDGE AND JENNIFER MUDGE**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XVIII of their Complaint against Defendant William Mudge and Jennifer Mudge for

breach of the Whistle Blower Statute 740 ILCS 174/15 by way of a conspiracy states the following:

250. Plaintiffs reallege Paragraphs 1-249 as if fully set forth herein.

251. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15

that states as follows:

**§ 15. Retaliation for certain disclosures prohibited.**

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*** (Empasis added)

252. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

253. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given

the blatant politicking by Harris and quickly discovered more prohibited political activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment including this Defendant William Mudge. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

254. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

255. This action by the Madison County Board was brought on by the actions of Defendant William Mudge's and Defendant Jennifer Mudge's participation in the "Madison County Public Corruption Task Force" which as Plaintiffs have alleged was wrought with false

and misleading information as previously described which was produced as detailed above by William Mudge, and Jennifer Mudge, and which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect the Defendants William Mudge and Jennifer Mudge as described herein, and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

256. Both Dorman and Hulme have been fired as a result of the specific participation of Defendants William and Jennifer Mudge, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with the Defendants William Mudge and Jennifer Mudge and Madison County to further said conspiracy.

257. That said conspiracy induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant William Mudge in Count XVIII, and for their costs herein expended.

**COUNT XVIII—CONSPIRACY WHISTLEBLOWER CLAIM**  
**AGAINST RAY WESLEY, MIKE WALTERS, JAMIE GOGGINS, ERICA**  
**HARRISS, AND MIKE PARKINSON**

COMES NOW Plaintiffs Dorman and Hulme by their attorney Michael Lawder and for Count XVIII of their Complaint against Defendants Wesley, Walters, Goggins, Harriss, and

Parkinson for breach of the Whistle Blower Statute 740 ILCS 174/15 by way of a conspiracy states the following:

258. Plaintiffs reallege Paragraphs 1-257 as if fully set forth herein.

259. In the State of Illinois at all relevant times there was a statute 740 ILCS 174/15 that states as follows:

**§ 15. Retaliation for certain disclosures prohibited.**

*(a) An employer may not retaliate against an employee who discloses information in a court, an administrative hearing, or before a legislative commission or committee, or in any other proceeding, where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.*

*(b) An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, **where the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation.** (Empasis added)*

260. In January and February 2017, Dorman in the pursuit of his job as Madison County IT Director, through lawful and appropriate means determined that Joseph Parente and Alan Dunstan both senior Madison County officials had misused Madison County equipment and the email system for political purposes in violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported this to their superior, Kurt Prenzler.

261. In January and February 2017, Hulme in the pursuit of his job as Madison County Administrator through lawful and appropriate means determined that former Madison County Director of Administrative Services Barry Harris, on county time, on county equipment and on the county IT network using county email in direct contradiction to Madison County Ordinance was involved in prohibited political activity. Hulme then did a broader search personally given

the blatant politicking by Harris and quickly discovered more prohibited politically activity on the county IT network by other persons. Involved in local Democratic politics and campaign fundraising were being coordinated improperly. These employees were scheduling the fundraisers and campaign activities on county time using county equipment. Hulme discovered the overt misuse was over a long period of time and at around that time gave information in confidence to Dorman and they reported this to their superior, Kurt Prenzler and other appropriate persons in the Madison County government. At no time did Dorman have access to the email archive or search the county email systems or look at emails, but instead followed Hulme's orders in giving Hulme access to the email archive and he consulted with Hulme on the email archive capabilities and county policy. Dorman only allowed Hulme access after Hulme pointed out the specific provisions in the Electronic Communications policy for him to have it.

262. As such the Madison County Board ultimately retaliated against Dorman and Hulme on April 16, 2020, at a special meeting of the Madison County Board, and it fired Dorman and Hulme in part because of the aforementioned briefing by defendants of the Grand Jury investigative materials and Slusser overhear, and for the improper task force investigation as detailed above, and because they had previously reported the above noted violation of Illinois law and the Madison County Government Electronic Communications Policies and Procedures over a long period of time. At around that time Dorman and Hulme reported these illegal acts to their superior, Kurt Prenzler.

263. This action by the Madison County Board was brought on by the actions of Defendants Wesley, Walters, Goggins, Harriss, and Parkinson's participation in the "Madison County Public Corruption Task Force" which as Plaintiffs have alleged was wrought with false and misleading information as previously described which was produced as detailed above by

Defendants Wesley, Walters, Goggins, Harriss, and Parkinson which could not have been accomplished without the conspiratorial participation by such employees as also detailed above. In effect the Defendant Defendants Wesley, Walters, Goggins, Harriss, and Parkinson and Madison County conspired to commit this illegal act of firing Dorman and Hulme as described above.

264. Both Dorman and Hulme have been fired as a result of the specific participation of Defendants Wesley, Walters, Goggins, Harriss, and Parkinson, in said conspiracy which is defined as a combination of two or more persons for the purpose of accomplishing, by some concerted action, either an unlawful purpose or a lawful purpose by unlawful means. *McClure v. Owens Corning Fiberglas Corp.*, 188 Ill. 2d 102, 133, 241 Ill.Dec. 787, 720 N.E.2d 242 (1999). Further, discovery will detail in more specific ways in which this Defendant acted in concert with the Defendant Jennifer Mudge and Madison County to further said conspiracy.

265. That said conspiracy induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Wesley, Walters, Goggins, Harriss, and Parkinson in Count XVIII, and for their costs herein expended.

**COUNT XIX—DEFAMATION AGAINST MADISON COUNTY, ILLINOIS**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XIX against the Madison County, Illinois for defamation states the following:



266. Plaintiffs hereby incorporate the preceding paragraphs 1-265 as if fully set forth herein and incorporated by reference.

267. The statements made by each and every one of the Madison County, Illinois' servants, employees and agents made as previously described in their work in the aforementioned Madison County Public Corruption Task Force were that the Plaintiffs had committed crimes as described were false, and said Defendant by its agents servants and employees knew those statements were false, and they published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

268. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contracts has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant Madison County, Illinois in Count XIX, and for their costs herein expended.

**COUNT XX—DEFAMATION AGAINST DAVID VUCICH, JOHN D. LAKIN,  
AND JEFF CONNOR**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XX against the Defendants Vucich, Lakin, and Connor for defamation states the following:

269. Plaintiffs hereby incorporate the preceding paragraphs 1-268 as if fully set forth herein and incorporated by reference.

270. The statements made by Defendants Vucich, Lakin, and Connor made as previously described in his work in the aforementioned Madison County Public Corruption Task

Force were that the Plaintiffs had committed crimes as described were false, and said Defendants knew those statements were false, and he published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

271. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contracts has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each IN Count XX against the Defendants Vucich, Lakin, and Connor, and for their costs herein expended.

**COUNT XXI—DEFAMATION AGAINST CHRIS SLUSSER, RICK FACCIN,  
PATRICK MC REA, AND JENNIFER ZOELZER**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXI against the Defendants Chris Slusser, Rick Faccin, Patrick McRea and Jennifer Zoelzer for defamation states the following:

272. Plaintiffs hereby incorporate the preceding paragraphs 1-271 as if fully set forth herein and incorporated by reference.

273. The statements made by Defendants Chris Slusser, Rick Faccin, Patrick McRea and Jennifer Zoelzer made as previously described in his work in the aforementioned Madison County Public Corruption Task Force were that the Plaintiffs had committed crimes as described were false, and said Defendants knew those statements were false, and he published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

274. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contracts has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count XXI in excess of \$50,000 each against the Defendants Chris Slusser, Rick Faccin, Patrick McRea and Jennifer Zoelzer, and for their costs herein expended.

**COUNT XXII—DEFAMATION AGAINST THOMAS GIBBONS**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXII against the Thomas Gibbons for defamation states the following:

275. Plaintiffs hereby incorporate the preceding paragraphs 1-274 as if fully set forth herein and incorporated by reference.

276. The statements made by Thomas Gibbons made as previously described in his work in the aforementioned Madison County Public Corruption Task Force were that the Plaintiffs had committed crimes as described were false, and said Defendant knew those statements were false, and he published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

277. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count XXII in excess of \$50,000 each against the Defendant Thomas Gibbons, and for their costs herein expended.

**COUNT XXIII—DEFAMATION AGAINST WILLIAM MUDGE AND JENNIFER MUDGE**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXIII against the Defendants William Mudge and Jennifer Mudge for defamation states the following:

278. Plaintiffs hereby incorporate the preceding paragraphs 1-277 as if fully set forth herein and incorporated by reference.

279. The statements made by William Mudge and Jennifer Mudge made as previously described in their work in the aforementioned Madison County Public Corruption Task Force were that the Plaintiffs had committed crimes as described were false, and said Defendants knew those statements were false, and he published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

280. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contracts has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count XXIII in excess of \$50,000 each against the Defendants William and Jennifer Mudge, and for their costs herein expended.

**COUNT XXIV—DEFAMATION AGAINST RAY WESLEY, MIKE WALTERS,  
JAMIE GOGGINS, ERICA HARRISS, AND TOM MCREA**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXIV against Defendants Wesley, Walters, Goggins, Harriss and McRea for defamation states the following:

281. Plaintiffs hereby incorporate the preceding paragraphs 1-280 as if fully set forth herein and incorporated by reference.

282. The statements made by Defendants Wesley, Walters, Goggins, Harriss and McRea made as previously described in her work in the aforementioned Madison County Public Corruption Task Force were that the Plaintiffs had committed crimes as described were false, and said Defendants knew those statements were false, and they published them without privilege ultimately to the Madison County Board which then fired Plaintiffs improperly and as such constituted defamation within the meaning of Illinois law.

283. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, and loss of other employment benefits.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in Count XXIV in excess of \$50,000 each against the Defendants Wesley, Walters, Goggins, Harriss and McRea, and for their costs herein expended.

**COUNT XXV—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST MADISON COUNTY, ILLINOIS**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXV against the Defendant Madison County, Illinois for intentional infliction of emotional distress states the following:

284. Plaintiffs hereby incorporate the preceding paragraphs 1-283 as if fully set forth herein and incorporated by reference.

285. The statements and actions of the investigations made by each and every one of the Madison County's servants, employees and agents made as previously described in their work in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and defendant's agents knew those matters were false, and further, defendant's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, defendant knew that there was a high probability that this conduct on defendant's part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

286. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant Madison County, Illinois in Count XXV, and for their costs herein expended.

**COUNT XXVI—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST DAVID VUCICH, JOHN LAKIN AND JEFF CONNOR**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXVI against the Defendants Vucich, Lakin, and Connor for intentional infliction of emotional distress states the following:

287. Plaintiffs hereby incorporate the preceding paragraphs 1-250 as if fully set forth herein and incorporated by reference.

288. The statements and actions of the investigations made by each and every one of the Defendants Vucich, Lakin, and Connor made as previously described in his work in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and Defendants Vucich, Lakin, and Connor knew those matters were false, and further, defendant's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, Defendants Vucich, Lakin, and Connor knew that there was a high probability that this conduct on defendant's part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

289. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Vucich, Lakin, and Connor in Count XXVI, and for their costs herein expended.

**COUNT XXVII—INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS  
AGAINST CHRIS SLUSSER, RICK FACCIN, JENNIFER ZOELZER,  
AND BOB DAIBER**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXVI against the Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber for intentional infliction of emotional distress states the following:

290. Plaintiffs hereby incorporate the preceding paragraphs 1-289 as if fully set forth herein and incorporated by reference.

291. The statements and actions of the investigations made by each and every one of the Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber made as previously described in their work and participation in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber knew those matters were false, and further, Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber knew that there was a high probability that this conduct on defendant's part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

292. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Chris Slusser, Rick Faccin, Jennifer Zoelzer, and Bob Daiber in Count XXVII, and for their costs herein expended.

**COUNT XXVIII—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST THOMAS GIBBONS**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXVI against the Defendant Thomas Gibbons for intentional infliction of emotional distress states the following:



293. Plaintiffs hereby incorporate the preceding paragraphs 1-292 as if fully set forth herein and incorporated by reference.

294. The statements of the investigations made by Defendant Thomas Gibbons made as previously described in his work in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and defendant Thomas Gibbons knew those matters were false, and further, defendant's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, defendant knew that there was a high probability that this conduct on defendant's part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

295. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendant Thomas Gibbons in Count XXVIII, and for their costs herein expended.

**COUNT XXIX—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST WILLIAM MUDGE AND JENNIFER MUDGE**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXIX against the Defendants William Mudge and Jennifer Mudge for intentional infliction of emotional distress states the following:

296. Plaintiffs hereby incorporate the preceding paragraphs 1-295 as if fully set forth herein and incorporated by reference.

297. The statements made by the Defendants William Mudge and Jennifer Mudge made as previously described in his work in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and Defendants William Mudge and Jennifer Mudge knew those matters were false, and further, Defendants William Mudge and Jennifer Mudge's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, Defendants William Mudge and Jennifer Mudge knew that there was a high probability that this conduct on Defendants William Mudge and Jennifer Mudge's part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

298. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants William Mudge and Jennifer Mudge in Count XXIXX, and for their costs herein expended.

**COUNT XXX—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST RAY WESLEY, MIKE WALTERS, JAMIE GOGGINS, ERICA HARRISS,  
MIKE PARKINSON, AND TOM MCREA**

COMES NOW Plaintiffs Robert Dorman and Douglas Hulme by their attorney Michael Lawder and for their Count XXX against the Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea for intentional infliction of emotional distress states the following:

299. Plaintiffs hereby incorporate the preceding paragraphs 1-298 as if fully set forth herein and incorporated by reference.

300.. The statements and actions of the investigations made by each and every one of the Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea made as previously described in their work and affiliation in the aforementioned Madison County Public Corruption Task Force that the Plaintiffs had committed in illegal activity and crimes as described were false, and further in the continued participation and involvement in the unlawful termination of the Plaintiffs, and Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea knew those matters were false, and further, Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea's conduct in reporting them herein was extreme and outrageous and beyond the pale; and further, Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea knew that there was a high probability that this conduct on Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea part would cause severe emotional distress to both Plaintiffs; and (3) that the conduct in fact caused severe emotional distress to both Plaintiffs.

301. As indicated, said defamation then induced termination of both of the Plaintiffs' employment contract has caused damages in the form of a loss of salary, loss of pension rights, loss of insurance, reputation and loss of other employment benefits and tremendous emotional damages such as anxiety, worry and post-traumatic stress disorder.

WHEREFORE, Plaintiffs Robert Dorman and Douglas Hulme pray for a judgment in excess of \$50,000 each against the Defendants Wesley, Walters, Goggins, Harriss, Parkinson, and McRea in Count XXX, and for their costs herein expended.

Respectfully submitted,

BY: /s/Michael A. Lawder  
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