

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
SIXTH MUNICIPAL DISTRICT, LAW DIVISION**

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Mariyana T. Spyropoulos
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MICHAEL E. HASTINGS)
)
Plaintiff,)
)
v.)
)
TIMOTHY PAWULA, MICHAEL W. GLOTZ,)
and the BIG TENT COALITION, LLC,)
)
Defendants,)
-----)
PATRICK SHEEHAN, LUCAS WADLEY,)
and GREG O'BRIEN,)
)
Respondents in Discovery.)

DOCKET NO.: **2025L066021**
PRESIDING JUDGE:
JURY DEMAND FILED

COMPLAINT AT LAW

NOW COMES the Plaintiff, **MICHAEL E. HASTINGS** (“Plaintiff” or “Hastings”), by and through his attorneys, AMUNDSEN DAVIS LLC, and for his Complaint at Law against Defendants, **TIMOTHY PAWULA** (“Pawula”), **MICHAEL W. GLOTZ** (“Glotz”), and the **BIG TENT COALITION, LLC**, an Illinois Limited Liability Company (“Big Tent”) (collectively, “Defendants”), and naming Respondents in Discovery, **PATRICK SHEEHAN** (“Sheehan”), **LUCAS WADLEY** (“Wadley”), and **GREG O'BRIEN** (“O'Brien”) (collectively, “Respondents”), the Plaintiff asserts the following:

INTRODUCTION

1. At all relevant times, Plaintiff was the incumbent candidate seeking re-election to the Illinois State Senate (19th Legislative District) on November 8, 2022. Plaintiff's Republican opponent was Patrick Sheehan.
2. Sheehan enlisted the help and financial support from others within his party, including Big Tent, Tim Ozinga (“Ozinga”) (its Founder and Chairman), Pawula (its Chief of Staff), and Glotz, who acted in his individual capacity despite serving as Mayor of Tinley Park.

3. The Defendants knew Sheehan was a relatively unknown, first-time candidate, and that it would be near impossible to defeat Hastings who first assumed the senate seat in 2012.

4. Leading up to the election and throughout the campaign cycle, these individuals (along with certain of their affiliates and affiliated entities) worked in concert to secure Sheehan's victory in the senate race by any means necessary.

5. Desperate to tip the scales in their favor, the Defendants resigned to deceitful and underhanded tactics. They conspired with Sheehan, Plaintiff's ex-wife, key operatives within Big Tent, and likely others to execute a malicious text-message campaign designed to defame, humiliate, and harass Plaintiff.

6. Each of the named Defendants played an unapologetic role in trying to destroy Plaintiff's esteemed reputation as a public official, accomplished lawyer, devoted father, and respected community leader. Their goal was not only to discredit Hastings in his official capacity, but also to compromise his personal and familial relationships and sabotage his expansive network.

7. To execute their plan, the Defendants knew they had to fabricate, and then widely publicize, unflattering images and false characterizations of the Plaintiff to a targeted audience (later described as the "Obscene Messages"). The Defendants' apparent goal was to undermine the public's perception of Plaintiff, manipulate voters, distract Plaintiff from his daily personal and professional responsibilities, and ultimately break his spirit.

8. Upon information and reasonable belief, Defendant Pawula -- in coordination with Defendants Glotz and Big Tent -- exploited paid text message campaigns and/or services or applications to spoof the text messages concerning Hastings. Spoofing is analogous to fraud where the sender's name, phone number, and possibly other aspects of the message are altered to appear as though the text originated from someone other than the actual source. By manipulating the phone numbers used to send the Obscene Messages, the Defendants were able to conceal from the public the actual authors and instigators behind the harmful speech.

9. This deliberate use of spoofing, combined with coordinated paid campaigns, underscores the lengths to which Pawula, Glotz, and Big Tent went to ensure their anonymity. They did so to mislead recipients, evade accountability, and ensure that their defamatory and obscene content reached a broad and unsuspecting audience.

10. In furtherance of their scheme to destroy Plaintiff's reputation, the Defendants, individually, and in conspiracy with one another are believed to have: (a) publicized defamatory falsehoods about Plaintiff with actual malice; (b) crafted and circulated inflammatory and obscene images using Plaintiff's name and likeness; (c) harassed and invaded Plaintiff's privacy by casting him in a false and unflattering light before the public at large; and (d) otherwise colluded with the intent of (1) tarnishing Plaintiff's good name throughout the State of Illinois; (2) disrupting Plaintiff's ability to meet his official responsibilities as an active member of the State's legislature; and (3) interfering with Plaintiff's campaign for senate and his existing and prospective relationships and business ventures.

11. Upon information and belief, the Defendants actively recruited third parties to help share, repost, and/or republish the Obscene Messages on a multitude of platforms, through gossip mongering, and by electronic mail and text. The identities of many of Defendants' co-conspirators still lurk in the shadows and remain unidentifiable. The Plaintiff's investigation persists, and he has named certain Respondents in Discovery who are believed to have personal knowledge regarding other culpable parties, as well as the nature and extent of their involvement.

12. Enlisting others helped compound the damage to Hastings' reputation, and it maximized the speed and reach of the intended harm consistent with their plan.

13. It is believed that the Obscene Messages infiltrated Plaintiff's personal and professional circles, likely subjecting Hastings to widespread ridicule and public scorn behind his back. The organized smear campaign compromised Plaintiff's distinguished career as a public servant, and its fallout continues to erode the reputation and legacy Hastings spent a lifetime building.

14. No reasonable person, even with Plaintiff's stature and access to the press, could stifle the whispers or combat the relentless attacks on his character. The time, energy, and expense necessary to counteract (or even mitigate) the harm caused is grossly disproportionate to the measures taken by the Defendants to spread the offensive speech in the first place.

15. The full scope of the Defendants' involvement remains inherently hidden and undiscoverable. Much of the information necessary to bring this lawsuit did not become accessible until law enforcement launched an independent investigation into the offending conduct. This investigation began long after Hastings defeated Sheehan in the November 2022 general election. As of the date of this filing, the Illinois State Police investigation was still pending and not subject to FOIA or subpoena. The Plaintiff and his attorneys continue to investigate the full extent of Defendants' actionable behavior, and they seek to unveil any others who may be complicit.

16. Backed into a corner, the Plaintiff had no choice other than to seek legal vindication against the Defendants to clear his name and uphold the sanctity of the political process. Hastings brings this lawsuit -- in both his individual and official capacities -- for **Defamation *Per Se*** (Counts I, II, and III), **False Light Invasion of Privacy** (Counts IV, V, and VI), **Nonconsensual Dissemination of Digitally-Altered Sexual Images** (Counts VII, VIII, and IX), and **Civil Conspiracy** (Count X).

17. In addition, Plaintiff identifies several Respondents in Discovery who are believed to have personal knowledge essential to the resolution of this action, as well as the identities of other individuals and/or entities who should be held legally accountable to the Plaintiff for the losses he sustained.

PARTIES

18. Plaintiff, Michael E. Hastings, is an individual residing in Frankfort, Illinois. He is an esteemed member the Illinois State Senate, founder of the suburban-based Hastings Law Firm, LLC, and a proud and devoted father of two young children.

19. At all relevant times, Timothy Pawula served as an official state employee hired by former State Representative Timothy Ozinga until Ozinga abruptly resigned in April 2024. Pawula simultaneously held the role of Chief Operating Officer for Ozinga's political action committee, the 'Big Tent Coalition,' and he has also served as Treasurer for Ozinga's political action committee, 'Ozinga for Illinois.' Upon information and belief, Pawula resides within the boundaries of Cook County.

20. Defendant Big Tent Coalition, LLC was, at all relevant times, an Illinois Limited Liability Company organized in the State of Illinois with its principal offices in Mokena, Illinois. Upon information and reasonable belief, Big Tent is committed to providing financial and campaign resources to candidates with constituents domiciled in Cook, DuPage, and Will Counties. At all relevant times, Big Tent employed Respondents Lucas Wadley and Greg O'Brien, and it continues to employ material witnesses, Ben Benoit, Justin Krolik, and Bryson George.

21. Defendant, Michael W. Glotz was, at all relevant times, Mayor of the Village of Tinley Park and Treasurer of "One Tinley Park," a political action committee. He was elected Mayor of Tinley Park in April 2021, after previously serving as a trustee and chairing the Public Works and Community Development committees. None of the conduct alleged against Glotz falls within the scope of Glotz's official duties or his responsibilities to the Village or to any political action committee. Upon information and belief, Glotz resides within the boundaries of Cook County.

JURISDICTION

22. Plaintiff, Michael E. Hastings, and Defendants, Timothy Pawula, Michael W. Glotz, and the Big Tent Coalition are all residents or are otherwise domiciled within the State of Illinois.

23. This Court has specific jurisdiction over the Defendants pursuant to 735 ILCS 5/2-209, in that the Defendants reside or are otherwise domiciled in the State of Illinois, and this state is likely where Defendants authored, published, and participated in the publication of actionable speech concerning Plaintiff via text message, and presumably by electronic mail, telephone, and on the

Internet. Upon information and reasonable belief, the Obscene Messages were directed at other Illinois residents, including the personal and professional affiliates of Hastings, as well as his political allies and adversaries.

24. In fact, the Defendants' coordinated smear campaign was conducted for the purpose of injuring the Plaintiff's personal and professional reputation throughout the State of Illinois, and specifically, within the 19th State Senate District where Plaintiff lives and is headquartered notwithstanding the time he spends in our State's capitol.

25. The Defendants disseminated the Obscene Messages intending to make Plaintiff a laughingstock among his peers, as well as influence Illinois residents into believing he was someone other than an upstanding citizen, father, and legislator.

26. The brunt of reputational harm and consequential damages caused by Defendants' conduct is, and will continue to be, felt most by the Plaintiff in Illinois where he is domiciled, where he is raising his minor children, where he earns a living, and where he serves the people of the 19th District.

VENUE

27. Venue is proper under 735 ILCS 5/2-101 "in the county in which the transaction or some part thereof occurred out of which the cause of action arose."

28. In the context of defamation, false light, and other non-physical torts, venue is proper in any district where the offending party *directed* their actionable speech, and where such speech caused the injured party more than an insignificant amount of reputational harm. This is because electronic statements can originate anywhere, and the harm to a claimant can be felt wherever the offending message is received.

29. Senator Hastings has represented the 19th District since his election to the position in November 2012; he maintains offices in Springfield, Illinois (Sangamon County), Frankfort, Illinois (Will County), and Matteson, Illinois (Cook County).

30. At all relevant times, the Plaintiff was, and still is, an Illinois State Senator serving the 19th State Senate District, which includes all or parts of the communities of Lockport (Will County), Homer Glen (Will County), Joliet (Will County), New Lenox (Will County), Frankfort (Will County), Mokena (Will County), Orland Park (Cook and Will Counties), Tinley Park (Cook and Will Counties), Orland Hills (Cook County), Markham (Cook County), Country Club Hills (Cook County), Hazel Crest (Cook County), Olympia Fields (Cook County), Richton Park (Cook County), Matteson (Cook and Will Counties), Frankfort Square (Will County), and Oak Forest (Cook County).

31. The Defendants published the large majority of the actionable speech using electronic means, and, upon information and belief, via text message to the public at large via their telephones or by enlisting third-party text services. The Obscene Messages were published in furtherance of the Defendants' goal to humiliate and discredit Plaintiff, and with the Defendants' joint authority, encouragement, and ratification.

32. Some or all of the conduct at issue was aimed at destroying Plaintiff's reputation in the eyes of Illinois residents living within the boundaries of Country Club Hills (Cook County), Hazel Crest (Cook County), Matteson (aspects of which are in Cook County), Oak Forest (Cook County), Olympia Fields (Cook County), Orland Hills (Cook County), Orland Park (aspects of which are in Cook County), Richton Park (Cook County), Tinley Park (aspects of which are in Cook County), and Markham (Cook County).

33. Notwithstanding the reach of the internet and Defendants' blanket text messaging campaign, the Defendants' Obscene Messages largely targeted residents of Cook County; to wit, the harm to Plaintiff was most felt within Cook County, and specifically the Sixth Municipal Judicial District (Markham).

34. Cook County is more (or just as) convenient a forum for discovery purposes as any other county implicated.

FACTS COMMON TO ALL COUNTS

Plaintiff, Michael E. Hastings

35. Plaintiff, Michael E. Hastings, is an individual residing in Frankfort, Illinois. His reputation has been defined by a lifetime of unwavering service to his country, his community, his children, his church, and to the people of the State of Illinois.

36. Hastings' formal education includes a Bachelor of Science degree in Leadership and Management from the United States Military Academy at West Point. During his time at West Point, Hastings played four seasons as an offensive lineman on the Army's Division-I football team. He was enrolled at West Point when al-Qaeda terrorists attacked the United States on September 11, 2001.

37. Hastings graduated from West Point in 2003. He was commissioned as an Officer in the United States Army and later served in Iraq. Hastings was promoted to Captain, and he served as aide-de-camp to the Commanding General of the 1st Infantry Division. Hastings was awarded a Bronze Star for meritorious service in a combat zone.

38. Thereafter, Hastings earned a Master of Business Administration (MBA) degree with honors from the University of Illinois at Champaign-Urbana. He later earned a Juris Doctor from the University of Illinois Chicago Law School (formerly known as, John Marshall Law School). While in law school, the Plaintiff served as a judicial extern to the First District Illinois Appellate Court and the Cook County States Attorney's Office.

39. Hastings is the founding attorney of Hastings Law Firm, LLC, a boutique general law practice with offices in the southwest suburbs of Chicago. Before opening his own practice, Hastings worked for a Fortune 100 company, and he served as Vice-President of the Board of Education for one of the largest high school districts in Illinois.

40. In 2012, Hastings successfully ran for the Illinois State Senate; he was one of the youngest senators in state history. Hastings first assumed the role in 2013, and since his inauguration, he has worked tirelessly to pass legislation aimed at improving the social and financial condition of

the state of Illinois and the welfare of its citizens. Hastings currently serves as the Chair of the Illinois Senate Judiciary Committee in addition to sitting on the Commerce and Licensed Activities Committees.

41. During his tenure, Hastings earned numerous accolades recognizing his dedication to public service, leadership, and advocacy. His honors include the Distinguished Legislative Service Award from The Link & Option Center, the Excellence in Leadership Awards from both the Chicago Southland Convention & Visitors Bureau and the South Suburban Park and Recreation Professional Association, and the Environmental Champion Award from the Illinois Environmental Council. He was named Elected Official of the Year by the Matteson Chamber of Commerce and received the Friend of Agriculture Award from the Illinois Farm Bureau. His humanitarian contributions were recognized with the Humanitarian Award from Grand Prairie Services.

42. Hastings was also honored as Legislator of the Year by several organizations, including the Illinois Association of Family Physicians, the Illinois Association of Park Districts, the Illinois Municipal League, the Illinois Public Transportation Association, the Illinois Public Higher Education Cooperative, the Illinois State Crime Commission, the Illinois State Veterinary Medical Association, the Mental Health Association of Illinois, the Sangamon County Farm Bureau, the Southwest Community Services Foundation, and the Southland Health Care Forum.

43. Stating further, Hastings was recognized in the Council of State Governments Magazine for his legislative efforts to combat cyber bullying. This recognition is particularly ironic given the Defendants' coordinated attack of Plaintiff's character using electronic means, social media, and the Internet.

44. As alleged in greater detail below, the Defendants individually, and oftentimes in collusion with one another, disseminated obscene, sexualized images using Plaintiff's name and likeness.

Plaintiff's Candidacy for State Senator (19th Legislative District)

45. The Illinois State Senate serves as the upper chamber of the Illinois General Assembly. Together with the Illinois House of Representatives, it forms the legislative branch of the state government and collaborates with the Governor of Illinois to create laws and establish the state budget. The Illinois State Senate's legislative authority and responsibilities include passing bills on public policy matters, determining state spending levels, adjusting tax policies, and voting to uphold or override gubernatorial vetoes.

46. At all relevant times, Plaintiff was the incumbent candidate seeking re-election to the Illinois State Senate (19th Legislative District) on November 8, 2022. Plaintiff's Republican opponent was Patrick Sheehan.

47. Sheehan enlisted the help and financial support from others within his party, including Big Tent, Ozinga (its Founder and Chairman), Pawula (its Chief of Staff), and Glotz, who acted in his individual capacity despite serving as Mayor of Tinley Park.

48. The Defendants knew Sheehan was a relatively unknown, first-time candidate, and that it would be near impossible to defeat Hastings who first assumed the senate seat in 2012. Leading up to the election and throughout the campaign cycle, these individuals (along with certain of their affiliates and affiliated entities) worked in concert to secure Sheehan's victory in the senate race by any means necessary.

49. Upon information and belief, the Defendants employed unscrupulous tactics and relied heavily on several of Hastings' rivals, including: (a) former Representative Timothy Ozinga of the 37th Representative District and Chairman of the Big Tent Coalition; (b) Michael W. Glotz, (c) NeighborhoodWatch, a suspected alias of Michael W. Glotz; and (d) Plaintiff's ex-wife.

50. Upon information and belief, the Defendants purposefully concealed their involvement by using aliases and third-party messaging services (i.e., Signal, i360 Marketing and Pinger, aka "Text Free") to target thousands of Illinois residents.

51. Upon information and belief, over 200,000 text messages were sent by Defendants (or at their direction) over several months between 2022 and 2023 from spoofed phone numbers. Text message spoofing, also known as SMS spoofing, is a technique that alters the sender's information in a text message to make it appear as if it came from someone else (either a real person or a fictitious one).

52. The full scope of the Defendants' involvement remains inherently hidden and undiscoverable. Much of the information necessary to bring this lawsuit did not become accessible until law enforcement launched an independent investigation into the offending conduct. This investigation began long after Hastings defeated Sheehan in the November 2022 general election. As of the date of this filing, the Illinois State Police investigation was still pending and not subject to FOIA or subpoena. The Plaintiff and his attorneys continue to investigate the full extent of Defendants' actionable behavior and seek to unveil any others who may be complicit.

53. On November 8, 2022, Plaintiff defeated Sheehan in the General Election for the office of State Senator, 19th Legislative District; yet the Defendants' text message and online campaign to destroy Plaintiff's reputation persisted.

False, Obscene, and Harassing Messages
Obscene Image #1

54. On November 6, 2022, at 12:51 p.m., a message was generated with the affiliate phone number (708) 312-9372. The offending text message consists of a digitally-altered, sexualized image of Plaintiff holding a penis and paired with the text, "[Plaintiff] calls Bob Rita's Dickhead the Eye of Sauron" and "THEN HE SUCKS IT!" (emphasis in original) (collectively, **Obscene Image #1**).

55. Obscene Image #1 casts Plaintiff in a false, demoralizing, and obscene light. The image and its supporting text have no redeeming value, and they are undeserving of constitutional or common law protection.

56. Upon information and belief, Obscene Image #1 was designed, procured, and/or widely disseminated by one or more of the Defendants through an organization called Pinger/Text Free.

57. The source of Obscene Image #1, its author(s), and the identity of all persons and organizations complicit in its dissemination were actively concealed by the Defendants and inherently hidden and undiscoverable until law enforcement launched an independent investigation into the offending conduct.

58. Upon information and belief, Obscene Image #1 was published to thousands of residents across the 19th Legislative District (and beyond), which resulted in demonstrable harm to Plaintiff's reputation, his livelihood, and his overall well-being.

Obscene Image #2

59. On November 8, 2022, at 7:25 a.m., a message was generated with the affiliate phone number (708) 312-9372. The offending text message consists of a digitally-altered image depicting Plaintiff naked and engaged in sodomy with House Leader, State Representative Robert A. Rita (28th Legislative District) (collectively, **Obscene Image #2**).

60. Obscene Image #2 casts Plaintiff in a false, demoralizing, and obscene light. The image and its supporting text have no redeeming value, and they are undeserving of constitutional or common law protection.

61. Upon information and belief, Obscene Image #2 was designed, procured, and/or widely disseminated by one or more of the Defendants through an organization called Pinger/Text Free.

62. The source of Obscene Image #1, its author(s), and the identity of all persons and organizations complicit in its dissemination were actively concealed by the Defendants and inherently hidden and undiscoverable until law enforcement launched an independent investigation into the offending conduct.

63. Upon information and belief, Obscene Image #2 was published to thousands of residents across the 19th Legislative District (and beyond), which resulted in demonstrable harm to Plaintiff's reputation, his livelihood, and his overall well-being.

Obscene Image #3

64. On November 11, 2022, a message was generated with the affiliate phone number (845) 819-4398. The offending text message consists of a digitally-altered image of Plaintiff on the senate floor holding a penis instead of a microphone. The offending image is paired with supporting text, "Heard [the Senate President] doesn't want to deal with a dick :(" (collectively, **Obscene Image #3**).

65. Obscene Image #3 casts Plaintiff in a false, demoralizing, and obscene light. The image and its supporting text have no redeeming value, and they are undeserving of constitutional or common law protection.

66. Upon information and belief, Obscene Image #3 was designed, procured, and/or widely disseminated by one or more of the Defendants through an organization called Pinger/Text Free.

67. The source of Obscene Image #3, its author(s), and the identity of all persons and organizations complicit in its dissemination were actively concealed by the Defendants and inherently hidden and undiscoverable until law enforcement launched an independent investigation into the offending conduct.

68. Upon information and belief, Obscene Image #3 was published to thousands of residents across the 19th Legislative District (and beyond), which resulted in demonstrable harm to Plaintiff's reputation, his livelihood, and his overall well-being.

Coordinated Attack by Defendants, Pawula, Glotz, and Big Tent

69. Upon information and reasonable belief, Obscene Images #1-3 (collectively referred to as the “**Obscene Messages**”) were financed, conceived, created, published, and/or ratified by the Defendants, including Pawula, Glotz, Big Tent, and several of Big Tent’s principals and agents.

70. The Obscene Messages had no legitimate social or political value and served no purpose other than to harm the Plaintiff’s reputation and standing within the community. Specifically,

- (a) the Obscene Messages were inflammatory and obscene, crafted solely to provoke outrage and incite negative emotions;
- (b) none of the Obscene Messages contributed to any meaningful or constructive public discourse regarding the Plaintiff’s qualifications, political platform, or legislative record;
- (c) the Obscene Messages were published with actual malice, in that the Defendants knew their characterizations of the Plaintiff were false or, alternatively, they acted with reckless disregard for the truth, showing a deliberate intent to cause harm;
- (d) the Obscene Messages consisted of targeted personal attacks, designed to distract from substantive discussions on policy, governance, and community issues; and
- (e) the Obscene Messages were intended to publicly humiliate the Plaintiff, which in turn, undermined the public’s trust in the democratic process and its respect for public officials elected to represent their interests.

71. Upon information and reasonable belief, Pawula (in the scope of his employment with Big Tent) and Glotz deliberately used “Signal,” an end-to-end encrypted messaging platform, to orchestrate and conceal their scheme to harass Plaintiff and disseminate the Obscene Messages targeting Plaintiff and his constituency. By exploiting Signal’s encryption features, they did their best to ensure their conduct was untraceable and insulated from scrutiny or liability.

72. Upon information and belief, at some unknown point in 2024, the Illinois State Police launched a formal criminal investigation into the alleged conduct and the source of the Obscene Messages. The Illinois State Police conducted surveillance and targeted interviews at Big Tent’s headquarters in Mokena, Illinois.

73. During the investigation, Pawula was identified as a key suspect. Upon information and reasonable belief, the Illinois State Police identified other active participants in the planning, coordination, and dissemination of the Obscene Messages targeting Plaintiff, as well as the underlying campaign to harass and intimidate Hastings.

74. Upon information and reasonable belief, the Illinois State Police identified the following individuals who may have been involved in the alleged efforts to disparage and/or humiliate Plaintiff, who was at all relevant times (and is currently) an acting state senator and a licensed member of the Illinois Bar: **Michael W. Glotz** (the current Mayor of the Village of Tinley Park); **Patrick Sheehan** (the current State Representative of the 37th Representative District); **Justin Krolik** (an individual acting in the scope of his employment with the Big Tent Coalition as its Data Director now elevated to Vice President of Operations, and also, the former Political Director to former Representative Timothy Ozinga); **Bryson George** (an individual acting in the scope of his employment with the Big Tent Coalition as its District Director now elevated to Director of Marketing and Sales); **Ben Benoit** (an individual acting in the scope of his employment with the Big Tent Coalition as a Data Analyst now elevated to Regional Director); **Greg O'Brien** (an individual then-acting in the scope of his employment with the Big Tent Coalition as its President); **Lucas Wadley** (an individual then-acting in the scope of his employment with the Big Tent Coalition as its System Administrator); and **David Ramirez** (a Principal of Michael Best Strategies LLC).

75. On April 8, 2024, Ozinga abruptly resigned from the Illinois House of Representatives, suspiciously timed just days after Illinois State Police executed a search warrant at Big Tent's headquarters.

76. In May of 2024, the Illinois Attorney General formally charged Pawula with two counts of harassment through electronic communication, one count of transmitting obscene messages, and one count of obscenity – all of which arise, at least in part, from the conduct described herein.

77. The charges accused Pawula of disseminating fabricated, sexually explicit images depicting Senator Hastings and Representative Bob Rita (D-Blue Island) in a deliberate effort to defame and degrade them. Upon information and reasonable belief, Pawula's actions were committed using the resources of Big Tent, and with Big Tent's authorization and subsequent ratification.

78. Ozinga's sudden departure amid the escalating investigation and subsequent indictment against his top operative raised serious questions about his knowledge of and involvement in the coordinated smear campaign.

79. Well before his resignation, Ozinga provided approximately \$1 million in funding to the Big Tent, which was used, at least in part, to bankroll Plaintiff's political opponent, Patrick Sheehan, in his 2022 campaign to unseat Senator Hastings.

80. Upon information and belief, Ozinga funneled these funds through Ozinga Concrete Company, Ozinga for Illinois, and/or the Big Tent organization as financial conduits to support the fundraising efforts of his political allies.

81. Upon information and belief, and at all relevant times, Big Tent facilitated distribution of the Obscene Messages to residents in the 19th Legislative District (and beyond). Big Tent's goal was to influence the election in Sheehan's favor with reckless disregard for Illinois law or the devastating reputational harm Hastings was sure to suffer.

82. Big Tent also paid Pawula, who served as its Chief Operating Officer and as an agent/employee of the organization, to oversee and support these efforts. Pawula's conduct was far from rogue or unforeseeable.

83. On May 23, 2024, Ozinga, as CEO of Big Tent, acknowledged via SMS text message to Rich Miller of Capitolfax.com, that Pawula was his employee and that he was aware of Pawula's actions.

84. Sheehan has publicly acknowledged his gratitude to Ozinga and Big Tent: "I was left for dead until I teamed up with the Big Tent Coalition – led by Representative Tim Ozinga. They ran

my campaign, and I could not be more impressed with the talented team they put together. Their transparency and communication with me (considering I'm a first-time candidate, I know that doesn't often happen) kept my spirits and effort consistent..."

85. Similarly, Sheehan has publicly acknowledged Glotz, stating: "Thank you to Mayor Michael Glotz of Tinley Park for his efforts to galvanize the community behind me throughout the campaign..." Pawula is believed to have committed the alleged acts at the insistence of and in coordination with Glotz.

86. Upon information and reasonable belief, Pawula (in the scope of his employment with Big Tent) and Glotz brazenly communicated using a secure, end-to-end, encrypted messaging platform known as "Signal" to coordinate distribution of Obscene Images 1-3, as well as other vulgar depictions including those targeting Governor JB Pritzker.

87. Upon information and belief, Glotz exploited the Pinger/Text Free text messaging service to commit the offending acts alleged herein.

88. Upon information and belief, Glotz sent politically-charged text messages to residents throughout Tinley Park -- many of which were disparaging of Plaintiff. Ozinga contributed \$3,500 to Glotz during the same senate campaign cycle.

89. Upon information and belief, Glotz and Pawula created the Obscene Messages and may have sought input from others before disseminating the same to the public at large.

90. Upon information and belief, though the Plaintiff's investigation continues, drafts of the Obscene Messages were sent to, *inter alia*, Justin Krolic (an individual acting in the scope of his employment with the Big Tent Coalition as its Data Director now elevated to Vice President of Operations, and also, the former Political Director to former Representative Timothy Ozinga); Lucas Wadley (an individual then-acting in the scope of his employment with the Big Tent Coalition as its System Administrator); and David Ramirez (a Principal of Michael Best Strategies LLC). The

involvement and/or solicitation of key political operatives underscores the Defendant's efforts to amplify the reach of the offending speech, as well as the damage sustained by their political adversary.

91. Upon information and belief, Glotz relies upon multiple alias email and social media accounts to degrade Hastings without reprisal. The aliases "Frankie Zielinski" and "Colonel McDowell" have been traced to an IP address associated with Glotz. Glotz used alias accounts to cover his tracks, deceive the public regarding the source of the speech, and evade legal exposure.

92. Upon information and belief, Glotz employs other aliases via social media to mask his identity and harass other elected officials throughout the south suburbs. These aliases, primarily used on Facebook, have been identified as: "Jack Harris," "Kate Palmer," "Tom Kaufman," "Mary Bears," "Barbara Jennings," "Mike Jewlick," and "Pamela Davis."

93 The combination of efforts by Pawula, Glotz, and Big Tent (through its authorized agents) demonstrates the lengths Plaintiff's adversaries will go to weaponize falsehoods and fabricate obscene images to manipulate the public's perception of Plaintiff for their own political agenda.

94. Defendants' concerted efforts were driven by actual malice and executed as part of a calculated campaign to: (a) publicly humiliate the Plaintiff and reduce him to a subject of ridicule and contempt, (b) obliterate his reputation and standing within the community, (c) force him to abandon his candidacy through relentless harassment, and (d) inflict severe mental anguish and emotional torment -- not only as a means of political manipulation, but also for their own gratification and personal amusement.

95. The full scope of Pawula's, Glotz's, Sheehan's, and the Big Tent's involvement remains inherently hidden and undiscoverable.

96. At the time of this filing, the Illinois State Police investigation was still pending and is not subject to FOIA or subpoena. The Plaintiff and his attorneys continue to investigate the full extent of Defendants' actionable behavior, and they seek to unveil any others who may be complicit.

COUNT I
DEFAMATION *PER SE*
AGAINST TIMOTHY PAWULA

97. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, as if fully restated in this Paragraph 97 of Count I.

98. The Plaintiff has dedicated his life to serving the people of Illinois with honor and distinction. As a decorated war veteran, an accomplished attorney, and a committed state legislator, Hastings has demonstrated an exceptional record of leadership and public service. His achievements reflect a deep-rooted integrity, an unyielding work ethic, and a sincere dedication to creating meaningful progress for the communities he represents.

99. Defendant Pawula, as agent/employee of the Big Tent Coalition, was specifically assigned to work on the campaign for Patrick Sheehan's State Senate bid, with his salary funded by Big Tent.

100. This campaign, however, was far from a political rivalry -- it was part of a deliberate smear campaign orchestrated by Pawula and the Big Tent Coalition under the leadership of its CEO, Ozinga. In collusion with Glotz, the Defendants executed a calculated plan to destroy the Plaintiff's reputation. This campaign was fueled, at least in part, in retaliation for Plaintiff's stance on legislation concerning the Tinley Park Mental Health Center.

101. Driven by envy, spite, and ruthless political ambition, Defendant Pawula aimed to leave the Plaintiff's career and legacy in ruins, inflicting maximum damage without regard for the truth or consequence.

102. To achieve this goal, Defendant Pawula crafted an elaborate web of lies and obscene images to interfere with Hastings' extensive personal and professional network.

103. The Obscene Messages, whether concocted or republished by Pawula, were engineered to tear down decades of Plaintiff's honorable service and personal sacrifice.

104. Defendant Pawula then used paid and unpaid text messaging campaigns to rapidly spread the defamatory and obscene content to a wide and vulnerable audience.

105. Upon information and belief, Defendant Pawula actively recruited and incited others to republish and spread the Obscene Messages to maximize the harm to Plaintiff's personal and professional standing.

106. Upon information and belief, Pawula, in concert with Glotz and the Plaintiff's ex-wife, also fabricated and leaked false and defamatory stories through Dan Mihalopoulos of the Chicago Sun-Times hoping to give the false speech a facade of legitimacy because the stories were in print.

107. Defendant Pawula misled the public at large into believing Plaintiff engages in unethical and immoral acts, including sodomy/fornication with his political allies.

108. The existence of a political campaign does not grant Defendant Pawula free rein to defame the Plaintiff or mislead the public by casting him in a false light. Nor does the fact that Hastings was the incumbent senator shield his opponent's supporters from liability for fabricating claims to destroy his character and fitness for office.

109. The law may impose a higher "actual malice" standard for liability, but it does not provide immunity for spreading defamatory falsehoods under the guise of political discourse.

110. Defendant Pawula's premeditated efforts were committed with actual malice and in furtherance of the Defendants' campaign to: (a) humiliate Plaintiff; (b) destroy his reputation before the public at large; (c) cause Plaintiff to withdraw his candidacy; and (d) inflict severe mental anguish and emotional distress for political leverage and personal amusement.

111. Defendant Pawula knew that the Obscene Messages he published about the Plaintiff were false at the time they were published, or alternatively, he acted with reckless disregard concerning the veracity of such characterizations. such statements based on, *inter alia*:

- (a) Pawula never possessed any uncontroverted, first-hand knowledge to substantiate any of the content contained within the Obscene Messages before he disseminated them to the public at large;

- (b) Pawula never possessed any tangible or documentary evidence demonstrating the veracity of any of the content contained within the Obscene Messages before he disseminated them to the public at large;
- (c) Pawula never thought to consult (or forewarn) Plaintiff so that Pawula could make an informed and careful decision before giving the Obscene Messages broad publicity through electronic means; and
- (d) Pawula knew or should have expected the irreversible reputational harm he would cause to Plaintiff by creating, and then publicizing, the Obscene Messages without a good faith basis to do so.

112. Defendant Pawula knew or should have expected the Obscene Messages he spread online and by text were likely to be believed and/or cause consternation and concern among those who found the messages credible, or otherwise assumed no one would fabricate such egregious accusations against a person without firsthand knowledge to substantiate the same.

113. Defendant Pawula also knew, or with substantial certainty should have expected, that the Obscene Messages would be republished by others, including but not limited to Plaintiff's political adversaries, and that they would be widely disseminated in the communities where Plaintiff lived, worked, and governed.

114. Reasonably understood, Defendant Pawula's Obscene Messages constitute *per se* defamation where their false publicity amounted to an implication that Plaintiff lacked integrity and was engaged in unchaste, immoral, and unethical conduct, including sodomy/fornication with his political allies.

115. The Obscene Messages had no legitimate social or political value and served no purpose other than to harm the Plaintiff's reputation and standing within the community. Specifically,

- (a) the Obscene Messages were inflammatory and obscene, crafted solely to provoke outrage and incite negative emotions;
- (b) none of the Obscene Messages contributed to any meaningful or constructive public discourse regarding the Plaintiff's qualifications, political platform, or legislative record;

- (c) the Obscene Messages were published with actual malice, in that the Defendants knew their characterizations of the Plaintiff were false or, alternatively, they acted with reckless disregard for the truth, showing a deliberate intent to cause harm;
- (d) the Obscene Messages consisted of targeted personal attacks, designed to distract from substantive discussions on policy, governance, and community issues; and
- (e) the Obscene Messages were intended to publicly humiliate the Plaintiff, which in turn, undermined the public's trust in the democratic process and its respect for public officials elected to represent their interests.

116. Pawula's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

117. Pawula's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. Pawula effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

118. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Pawula's involvement in the Defendants' conspiracy to defame Plaintiff, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count I be entered against the Defendant, **TIMOTHY PAWULA**, an individual, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Hundred Thousand Dollars (\$500,000.00), for his willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact his conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, and that he be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT II
DEFAMATION *PER SE*
AGAINST MICHAEL W. GLOTZ

119. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, as if fully restated in this Paragraph 119 of Count II.

120. The Plaintiff has dedicated his life to serving the people of Illinois with honor and distinction. As a decorated war veteran, an accomplished attorney, and a committed state legislator, Hastings has demonstrated an exceptional record of leadership and public service. His achievements reflect a deep-rooted integrity, an unyielding work ethic, and a sincere dedication to creating meaningful progress for the communities he represents.

121. In collusion with Pawula and the Big Tent Coalition, Glotz executed a calculated plan to destroy the Plaintiff's reputation. This campaign was fueled, at least in part, in retaliation for Plaintiff's stance on legislation concerning the Tinley Park Mental Health Center.

122. Driven by envy, spite, and ruthless political ambition, Defendant Glotz aimed to leave the Plaintiff's career and legacy in ruins, inflicting maximum damage without regard for the truth or consequence.

123. To achieve this goal, Defendant Glotz crafted an elaborate web of lies and obscene images to interfere with Hastings' extensive personal and professional network.

124. The Obscene Messages, whether concocted or republished by Glotz, were engineered to tear down decades of Plaintiff's honorable service and personal sacrifice.

125. Defendant Glotz then used paid and unpaid text messaging campaigns to rapidly spread the defamatory and obscene content to a wide and vulnerable audience.

126. Upon information and belief, Defendant Glotz actively recruited and incited others to republish and spread the Obscene Messages to maximize the harm to Plaintiff's personal and professional standing.

127. Defendant Glotz misled the public at large into believing Plaintiff engages in unethical and immoral acts, including sodomy/fornication with his political allies.

128. The existence of a political campaign does not grant the Defendant Glotz free rein to defame the Plaintiff or mislead the public by casting him in a false light. Nor does the fact that Hastings was the incumbent senator shield his opponent's supporters from liability for fabricating claims to destroy his character and fitness for office.

129. The law may impose a higher "actual malice" standard for liability, but it does not provide immunity for spreading defamatory and/or obscene falsehoods under the guise of political discourse.

130. Defendant Glotz's premeditated efforts were committed with actual malice and in furtherance of the Defendants' campaign to: (a) humiliate Plaintiff; (b) destroy his reputation before the public at large; (c) cause Plaintiff to withdraw his candidacy; and (d) inflict severe mental anguish and emotional distress for political leverage and personal amusement.

131. Defendant Glotz knew that the Obscene Messages he published about the Plaintiff were false at the time they were published, or alternatively, he acted with reckless disregard concerning the veracity of such characterizations. such statements based on, *inter alia*:

- (a) Glotz never possessed any uncontroverted, first-hand knowledge to substantiate any of the content contained within the Obscene Messages before he disseminated them to the public at large;
- (b) Glotz never possessed any tangible or documentary evidence demonstrating the veracity of any of the content contained within the Obscene Messages before he disseminated them to the public at large;
- (c) Glotz never thought to consult (or forewarn) Plaintiff so that Glotz could make an informed and careful decision before giving the Obscene Messages broad publicity through electronic means; and

- (d) Glotz knew or should have expected the irreversible reputational harm he would cause to Plaintiff by creating, and then publicizing, the Obscene Messages without a good faith basis to do so.

132. Defendant Glotz knew or should have expected the Obscene Messages he spread online and by text were likely to be believed and/or cause consternation and concern among those who found the messages credible, or otherwise assumed no one would fabricate such egregious accusations against a person without firsthand knowledge to substantiate the same.

133. Defendant Glotz also knew, or with substantial certainty should have expected, that the Obscene Messages would be republished by others, including but not limited to Plaintiff's political adversaries, and that they would be widely disseminated in the communities where Plaintiff lived, worked, and governed.

134. Reasonably understood, Defendant Glotz's Obscene Messages constitute *per se* defamation where their false publicity amounted to an implication that Plaintiff lacked integrity and was engaged in unchaste, immoral, and unethical conduct, including sodomy/fornication with his political allies.

135. The Obscene Messages had no legitimate social or political value and served no purpose other than to harm the Plaintiff's reputation and standing within the community. Specifically,

- (a) the Obscene Messages were inflammatory and obscene, crafted solely to provoke outrage and incite negative emotions;
- (b) none of the Obscene Messages contributed to any meaningful or constructive public discourse regarding the Plaintiff's qualifications, political platform, or legislative record;
- (c) the Obscene Messages were published with actual malice, in that the Defendants knew their characterizations of the Plaintiff were false or, alternatively, they acted with reckless disregard for the truth, showing a deliberate intent to cause harm;
- (d) the Obscene Messages consisted of targeted personal attacks, designed to distract from substantive discussions on policy, governance, and community issues; and
- (e) the Obscene Messages were intended to publicly humiliate the Plaintiff, which in turn, undermined the public's trust in the democratic process and its respect for public officials elected to represent their interests.

136. Glotz's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

137. Moreover, on numerous occasions, and despite no previous contact between the two, Glotz contacted Plaintiff's ex-wife to find a common enemy and conspire together to support his political agenda and her effort to garner leverage in contentious divorce proceedings.

138. Upon information and reasonable belief, Glotz conspired with Plaintiff's ex-wife to fabricate a police report knowing that he could obtain a copy of the same and leak it to the press and online. Glotz did so under the guise that a police report was an official report that could be republished with impunity.

139. Upon information and belief, Glotz, in concert with Pawula and the Plaintiff's ex-wife, leaked false and defamatory stories through Dan Mihalopoulos of the Chicago Sun-Times hoping to give the false speech a facade of legitimacy because the stories were in print.

140. This behavior is consistent with Glotz's pattern of misconduct for political purposes. Upon information and belief, Glotz has created and disseminated derogatory footage/graphics of his political opponents, and he has distributed such footage/graphics to other elected officials and/or directed third-parties to post them online or share them within their networks.

141. For instance, upon information and belief, Glotz created and shared digitally-altered, sexually explicit images depicting Governor JB Pritzker, which included offensive, graphic depictions of male genitalia. The Obscene Messages depicting Plaintiff closely resemble (in form and substance) the digitally-altered, sexualized images of Pritzker.

142. Upon information and belief, Glotz sent these obscene and doctored images to Pawula as part of their coordinated effort to degrade, humiliate, and defame political figures for their own political amusement and selfish gain. It is believed that Glotz used end-to-end encrypted messaging services to conceal his activities and avoid legal repercussions.

143. Upon information and belief, Glotz also uses these on-line and social media aliases to avoid detection when harassing his political adversaries, including the Plaintiff: “Frankie Zielinski,” “Barbara Jennings,” “Mary Bears,” “Pamela Davis,” “Albert Kulig,” “Mike Jewlick,” “Jack Harris,” “Thomas Kaufmann,” and “Kate Palmer.”

144. Glotz’s use of aliases and anonymous spoofed phone numbers persisted well after the conclusion of the Sheehan-Hastings election.

145. Glotz continues to spread falsehoods and conspire with various third parties to discredit and undermine Hastings personally and professionally. Glotz’s actions suggest a vindictive obsession, using lies and coordinated attacks to sabotage Hastings’ good name and commitment to public service.

146. Glotz’s role in the Defendants’ coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. Glotz effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

147. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Glotz’s involvement in the Defendants’ conspiracy to defame Plaintiff, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count II be entered against the Defendant, **MICHAEL W. GLOTZ**, an individual, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Hundred Thousand Dollars (\$500,000.00), for his willful and contumacious disregard for the Plaintiff’s

emotional and physical well-being, and the foreseeable impact his conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, and that he be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT III
DEFAMATION *PER SE*
AGAINST BIG TENT COALITION, LLC

148. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, as if fully restated in this Paragraph 148 of Count III.

149. The Plaintiff has dedicated his life to serving the people of Illinois with honor and distinction. As a decorated war veteran, an accomplished attorney, and a committed state legislator, Hastings has demonstrated an exceptional record of leadership and public service. His achievements reflect a deep-rooted integrity, an unyielding work ethic, and a sincere dedication to creating meaningful progress for the communities he represents.

150. Defendant Pawula, an agent/employee of the Big Tent Coalition, was specifically assigned to work on the campaign for Patrick Sheehan's State Senate bid, with his salary funded by Big Tent.

151. This campaign, however, was far from a political rivalry -- it was part of a deliberate smear campaign orchestrated by Pawula and the Big Tent Coalition under the leadership of its CEO, Ozinga. In collusion with Glotz, the Defendants executed a calculated plan to destroy the Plaintiff's reputation. This campaign was fueled, at least in part, in retaliation for Plaintiff's stance on legislation concerning the Tinley Park Mental Health Center.

152. The Big Tent Coalition, heavily funded by entities affiliated with Timothy Ozinga, played a central role in orchestrating a targeted campaign to defame and harass the Plaintiff.

153. Funds contributed to Big Tent were used, at least in part, to employ Defendant Pawula, who was at all relevant times the acting CEO and Chief Operating Officer of Big Tent. Pawula worked in coordination with Glotz to execute a smear campaign designed to tarnish the Plaintiff's reputation and compromise his personal and professional standing.

154. Unfettered access to Big Tent's robust financial resources enabled Pawula and Glotz to fulfill their conspiracy to defame, humiliate, and harass Plaintiff.

155. Defendant Timothy Pawula was an employee and agent of the Big Tent Coalition and acted at all relevant times pursuant to the direction and authority granted to him by his employer. The conduct at issue was germane and inextricably linked to the mission and objectives of the organization and its support of Patrick Sheehan and other Plaintiff-adverse candidates and officials.

156. Upon information and belief, Pawula acted pursuant to the direction, authority and/or subsequent ratification of Big Tent/Ozinga when he committed the alleged acts. Likewise, Pawula, and to some extent Glotz, exploited Big Tent's resources, which were necessary to commit the alleged acts and give the Obscene Messages broad publicity.

157. The Obscene Messages, whether concocted or republished by Big Tent, were engineered to tear down decades of Plaintiff's honorable service and personal sacrifice.

158. Upon information and belief, Big Tent used paid and/or unpaid text messaging campaigns to rapidly spread the defamatory and obscene content to a wide and vulnerable audience. It is also believed that Big Tent funded the use of spoofed phone numbers to send Senator Hastings disparaging text messages containing petty and insulting remarks about his appearance.

159. Upon information and belief, Defendant Big Tent actively recruited and incited others to republish and spread the Obscene Messages.

160. Big Tent misled the public at large into believing Plaintiff engages in unethical and immoral acts, including sodomy/fornication with his political allies.

161. The existence of a political campaign does not grant the Big Tent Coalition free rein to defame the Plaintiff or mislead the public by casting him in a false light. Nor does the fact that Hastings was the incumbent senator shield his opponent's supporters from liability for fabricating claims to destroy his character and fitness for office.

162. The law may impose a higher "actual malice" standard for liability, but it does not provide immunity for spreading defamatory falsehoods under the guise of political discourse.

163. The Big Tent Coalition's premeditated efforts were committed with actual malice and in furtherance of the Defendants' campaign to: (a) humiliate Plaintiff; (b) destroy his reputation before the public at large; (c) cause Plaintiff to withdraw his candidacy; and (d) inflict severe mental anguish and emotional distress for political leverage and personal amusement.

164. Big Tent, through its authorized agents and assigns, knew that the Obscene Messages it funded and then published about the Plaintiff were false at the time they were published online and through word of mouth, or alternatively, it acted with reckless disregard concerning the veracity of such statements based on, *inter alia*:

- (a) Big Tent never possessed any uncontroverted, first-hand knowledge to substantiate any of the content contained within the Obscene Messages before it disseminated them to the public at large;
- (b) Big Tent never possessed any tangible or documentary evidence demonstrating the veracity of any of the content contained within the Obscene Messages before it disseminated them to the public at large;
- (c) Big Tent never thought to consult (or forewarn) Plaintiff so that Big Tent could make an informed and careful decision before giving the Obscene Messages broad publicity through electronic means; and
- (d) Big Tent knew or should have expected the irreversible reputational harm it would cause to Plaintiff by creating, and then publicizing, the Obscene Messages without a good faith basis to do so.

165. Big Tent, through its authorized agents and assigns, knew or should have expected the Obscene Messages it funded and then spread online and by text were likely to be believed and/or cause consternation and concern among those who found the messages credible, or otherwise

assumed no one would fabricate such egregious accusations against a person without firsthand knowledge to substantiate the same.

166. Big Tent also knew, or with substantial certainty should have expected, that the Obscene Messages it funded to create would be republished by others, including but not limited to Plaintiff's political adversaries, and that they would be widely disseminated in the communities where Plaintiff lived, worked, and governed.

167. Reasonably understood, the Big Tent Coalition's Obscene Messages constitute *per se* defamation where their false publicity amounted to an implication that Plaintiff lacked integrity and was engaged in unchaste, immoral, and unethical conduct, including sodomy/fornication with his political allies.

168. The Obscene Messages had no legitimate social or political value and served no purpose other than to harm the Plaintiff's reputation and standing within the community. Specifically,

- (a) the Obscene Messages were inflammatory and obscene, crafted solely to provoke outrage and incite negative emotions;
- (b) none of the Obscene Messages contributed to any meaningful or constructive public discourse regarding the Plaintiff's qualifications, political platform, or legislative record;
- (c) the Obscene Messages were published with actual malice, in that the Defendants knew their characterizations of the Plaintiff were false or, alternatively, they acted with reckless disregard for the truth, showing a deliberate intent to cause harm;
- (d) the Obscene Messages consisted of targeted personal attacks, designed to distract from substantive discussions on policy, governance, and community issues; and
- (e) the Obscene Messages were intended to publicly humiliate the Plaintiff, which in turn, undermined the public's trust in the democratic process and its respect for public officials elected to represent their interests.

169. Upon information and belief, Pawula, using Big Tent resources, exchanged digitally - altered, sexually explicit images depicting Governor JB Pritzker, which included offensive, graphic depictions of male genitalia. The Obscene Messages depicting Plaintiff closely resemble (in form and substance) the digitally altered, sexualized images of Pritzker.

170. The Big Tent's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

171. The Big Tent's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. Big Tent effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

172. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of the Big Tent's involvement in the Defendants' conspiracy to defame Plaintiff, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count III be entered against the Defendant, **BIG TENT COALITION, LLC**, an Illinois Limited Liability Company, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Hundred Thousand Dollars (\$500,000.00), for its willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact his conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant, through its agents and employees, be enjoined from any future, similar conduct, and that they be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT IV
FALSE LIGHT INVASION OF PRIVACY
AGAINST TIMOTHY PAWULA

173. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, and Paragraphs 98 through 118, as if fully restated in this Paragraph 173 of Count IV.

174. Defendant Timothy Pawula, acting individually and as an agent of the Big Tent Coalition, disseminated the Obscene Messages, which contained false and misleading portrayals of Plaintiff that cast Plaintiff in a false and unflattering light before the public at large.

175. Upon information and belief, the Obscene Messages were disseminated widely to members of the public across the State of Illinois.

176. Defendant Pawula played a material role in creating and distributing the Obscene Messages, which included doctored images and false narratives designed to convey the impression that Plaintiff engaged in unethical, unchaste, and immoral conduct.

177. The publicity given to the Obscene Messages concerning Plaintiff would be highly offensive to any reasonable person similarly situated. Defendant Pawula's conduct was so extreme, outrageous, methodical, and pervasive that no person in Plaintiff's shoes would be expected to endure it.

178. Defendant Pawula acted with actual malice, knowing that the Obscene Messages would cast Plaintiff in an unflattering and false light to the public at large; alternatively, Pawula exhibited a reckless (if not callous) disregard for the truth and accuracy of how Hastings was portrayed, coupled with the irreversible impact publication of the Obscene Messages would have on Plaintiff's reputation and well-being.

179. The dissemination of the Obscene Messages by Pawula, in conspiracy with his co-defendants, was intended to damage Plaintiff's reputation and subject him to public ridicule, humiliation, and disgrace.

180. Pawula's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

181. Pawula's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. Pawula effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

182. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Pawula's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count IV be entered against the Defendant, **TIMOTHY PAWULA**, an individual, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Hundred Thousand Dollars (\$500,000.00), for his willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact his conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, and that they be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT V
FALSE LIGHT INVASION OF PRIVACY
AGAINST MICHAEL W. GLOTZ

183. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, and Paragraphs 120 through 147, as if fully restated in this Paragraph 183 of Count V.

184. Defendant Michael W. Glotz, acting individually and in concert with the Big Tent Coalition and Pawula, disseminated the Obscene Messages, which contained false and misleading portrayals of Plaintiff that cast Plaintiff in a false and unflattering light before the public at large.

185. The Obscene Messages were disseminated widely to members of the public across the State of Illinois.

186. Defendant Glotz played a material role in creating and distributing the Obscene Messages, which included doctored images and false narratives designed to convey the impression that Plaintiff engaged in unethical, unchaste, and immoral conduct.

187. The publicity given to the Obscene Messages concerning Plaintiff would be highly offensive to any reasonable person similarly situated. Defendant Glotz's conduct was so extreme, outrageous, methodical, and pervasive that no person in Plaintiff's shoes would be expected to endure it.

188. Defendant Glotz acted with actual malice, knowing that the Obscene Messages would cast Plaintiff in an unflattering and false light to the public at large; alternatively, Glotz exhibited a reckless (if not callous) disregard for the truth and accuracy of how Hastings was portrayed, coupled with the irreversible impact publication of the Obscene Messages would have on Plaintiff's reputation and well-being.

189. The dissemination of the Obscene Messages by Glotz, in conspiracy with his co-defendants, was intended to damage Plaintiff's reputation and subject him to public ridicule, humiliation, and disgrace.

190. Defendant Glotz's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

191. Glotz's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. Glotz effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

192. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Glotz's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count V be entered against the Defendant, **MICHAEL W. GLOTZ**, an individual, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in the amount no less than Five Hundred Thousand Dollars (\$500,000.00), for his willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact his conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, and that it be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT VI
FALSE LIGHT INVASION OF PRIVACY
AGAINST BIG TENT COALITION, LLC

193. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, and Paragraphs 149 through 172, as if fully restated in this Paragraph 193 of Count VI.

194. The Big Tent Coalition, acting through its leadership, agents, and employees, including Defendant Pawula, funded, and directed publication of the Obscene Messages, which contained false and misleading portrayals of Plaintiff that cast Plaintiff in a false and unflattering light before the public at large.

195. The Obscene Messages were disseminated widely to members of the public across the State of Illinois, including to Plaintiff's constituents; Plaintiff's investigation nevertheless continues.

196. Upon information and belief, the Big Tent Coalition provided financial and logistical support for the dissemination of the Obscene Messages, which included doctored images and false narratives designed to convey the impression that Plaintiff engaged in unethical, unchaste, and immoral conduct.

197. The publicity given to the Obscene Messages concerning Plaintiff would be highly offensive to any reasonable person similarly situated. The Big Tent Coalition's conduct was so extreme, outrageous, methodical, and pervasive that no person in Plaintiff's shoes would be expected to endure it.

198. The Big Tent Coalition, through its agents and leadership, acted with actual malice, knowing that the Obscene Messages would cast Plaintiff in an unflattering and false light to the public at large; alternatively, Big Tent exhibited a reckless (if not callous) disregard for the truth and accuracy of how Hastings was portrayed, coupled with the irreversible impact publication of the Obscene Messages would have on Plaintiff's reputation and well-being.

199. The dissemination of the Obscene Messages by Big Tent, in conspiracy with its co-defendants, was intended to damage Plaintiff's reputation and subject him to public ridicule, humiliation, and disgrace.

200. The Big Tent's publication of the Obscene Messages infiltrated every facet of the Plaintiff's personal and professional life, subjecting him to unwarranted ridicule and scorn.

201. The Big Tent's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. The Big Tent Coalition effectively forced Plaintiff to exhaust significant time, effort, and financial resources to counteract the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

202. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of the Big Tent's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count VI be entered against the Defendant, **BIG TENT COALITION, LLC**, an Illinois Limited Liability Company, in an amount fair and just, but no less than Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Hundred Thousand Dollars (\$500,000.00), for its willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact its conduct would have on Plaintiff's personal and professional reputation.

FURTHERMORE, Plaintiff prays that this Defendant, through its agents and employees, be enjoined from any future, similar conduct, and that they be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official

document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT VII
NONCONSENSUAL DISSEMINATION OF SEXUALIZED IMAGES
AGAINST TIMOTHY PAWULA

203. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, Paragraphs 98 through 118, and Paragraphs 174 through 182, as if fully restated in this Paragraph 203 of Count VII.

204. Non-consensual dissemination of sexualized images, 720 ILCS 5/11-23.5(b), provides: that a person (or entity) commits non-consensual dissemination of digitally-altered sexual images when he or she: (1) intentionally disseminates an image of another person: (A) who is at least 18 years of age; and (B) who is identifiable from the image itself or information displayed in connection with the image; and (C) who is engaged in a sexual act or whose intimate parts are exposed, in whole or in part; and (2) obtains the image under circumstances in which a reasonable person would know or understand that the image was to remain private; and (3) knows or should have known that the person in the image has not consented to the dissemination.

205. Ironically, Senate Bill 1009 was sponsored by Sen. Hastings along with State Representative Scott Drury. The bill makes the non-consensual dissemination of obscene sexual images a Class 4 felony punishable by one (1) to three (3) years in prison. “This is an important modernization of our laws that will protect people’s lives and reputations from cyberbullying and intimidation,” Senator Hastings stated publicly.

206. In full force and effect at all relevant times, Illinois codified a private, civil cause of action pursuant to 740 ILCS 190/1 et seq., which governs Defendant Pawula’s dissemination of the Obscene Messages.

207. Under Illinois law, any images of a sexual nature that are shared without the consent of the parties in them can be classified as “revenge porn.”

208. The Illinois Supreme Court has recognized revenge porn as a “unique crime fueled by technology.” In an age where nearly everyone has access to cell phones and social media, the risk of private or obscene images being distributed to unintended recipients has significantly increased. Notably, an individual can still be prosecuted for revenge porn even if the image was disseminated through means other than the internet.

209. The most devastating aspect for victims like the Plaintiff, is that once an obscene image is released into cyberspace or disseminated to the public at large via text message, it becomes virtually impossible to retrieve or erase. The internet’s permanence ensures that such images are shared, saved, and reposted indefinitely, leaving the victim powerless to contain the spread.

210. Preventing its re-transmission or republication is entirely beyond the victim’s control, as the offensive content is continuously circulated -- often without their knowledge or consent -- compounding the emotional and reputational harm inflicted with each new exposure.

211. The crime of obscenity prohibits the publication, distribution, or advertisement of “obscene” materials. While nudity alone is not enough to make pictures or video legally obscene, Illinois courts have consistently held that pictorial or written portrayals of nudity may be deemed obscene if accompanied by depictions of explicit sexual activity.

212. Obscenity, as contemplated by the statute, should be afforded its ordinary dictionary definition “disgusting to the senses” or “abhorrent to morality or virtue.”

213. Material is considered obscene under the statute if: (1) the average person, applying contemporary adult community standards, would find that, taken as a whole, it appeals to the prurient interest; and (2) the average person, applying contemporary adult community standards, would find that it depicts or describes, in a patently offensive way, ultimate sexual acts or sadomasochistic sexual acts, whether normal or perverted, actual or simulated, or masturbation, excretory functions or lewd exhibition of the genitals; and (3) taken as a whole, it lacks serious literary, artistic, political or scientific value.

214. The Act reasonably contemplates victims depicted in sexually-explicit “deepfakes,” including images manipulated digitally to portray obscene events.

215. In fact, Governor JB Pritzker signed a measure (H.B. 2123) clarifying that intentionally altered images are covered by existing laws against revenge porn, even if the images are digitally fabricated.

216. A perpetrator’s defense that an obscene photo is unrealistic or unlikely to convince recipients that the act occurred is not valid under the statute.

217. Digitally altered images are often used by stalkers and offenders as part of broader attacks meant to humiliate, demean, and intimidate victims as retaliation.

218. With intent, malice, and premeditation, Defendant Pawula disseminated or publicized the Obscene Messages, which contain digitally altered, highly offensive images depicting Plaintiff in sexualized and compromising behavior with political allies.

219. The Plaintiff’s face was deliberately interposed in the obscene image to ensure he was readily identifiable to anyone familiar with him or his public role as a longstanding state official.

220. Plaintiff had a legitimate expectation that, despite the existence of political critics and adversaries, no individual or entity would engage in the reprehensible act of fabricating obscene images using his likeness -- let alone fund, facilitate, or exploit distribution mechanisms -- to ensure such images received broad publicity.

221. The Obscene Messages, whether concocted or republished by Pawula, were engineered to tear down decades of Plaintiff’s honorable service and personal sacrifice.

222. Upon information and belief, Defendant Pawula actively recruited and incited others to republish and spread the Obscene Messages to maximize the harm to Plaintiff’s personal and professional standing.

223. Upon information and reasonable belief, Pawula made certain the Obscene Messages were disseminated throughout the State of Illinois, though Plaintiff’s investigation continues.

224. The obscene and sexual nature of the images using Plaintiff's likeness brought dishonor to the Plaintiff and compromised the respect he had earned in his community over many decades.

225. Defendant Pawula knew or certainly should have known that Plaintiff did not -- and would never -- consent to the dissemination of the Obscene Messages.

226. Nevertheless, this Defendant, without Plaintiff's knowledge, consent, or authorization, enlisted third-party texting services to rapidly spread the Obscene Messages to a wide and vulnerable audience.

227. Upon information and belief, Pawula also employed "Signal," an end-to-end encrypted messaging service, to conceal his communications with his co-conspirators. Pawula's goal was to evade detection while executing a coordinated scheme to destroy Plaintiff's credibility and standing in the communities where he lives, works, and governs.

228. Defendant Pawula's publication of the Obscene Messages was a calculated act of malice, devoid of any good faith or newsworthy purpose, nor did it serve any legitimate public interest.

229. Pawula's goal was to degrade and humiliate the Plaintiff, weaponize public opinion for political gain, coerce Plaintiff's allies into abandoning their support, and pressure the Plaintiff into resigning from his position using tactics to impose fear, disgrace, and to force Hastings into isolation.

230. Pawula's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. It is believed that the harm extended across Hastings' political, legal, and social networks, jeopardizing longstanding relationships and professional opportunities.

231. Pawula effectively forced Plaintiff to exhaust significant time, effort, and financial resources to mitigate the harm caused by dissemination of the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

232. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Pawula's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count VII be entered against the Defendant, **TIMOTHY PAWULA**, an individual, in an amount fair and just, but no less than the greater of: (a) economic and noneconomic damages proximately caused by this Defendant's dissemination of Obscene Statements #1-3, including damages for emotional distress whether or not accompanied by other damages; or (b) statutory damages, not to exceed ten thousand dollars (\$10,000) for each and every distinct dissemination of an Obscene Image depicting Plaintiff. In determining the amount of statutory damages allowable under the Act, consideration shall be given to the sheer number of unique disseminations (or threatened disseminations) attributable to this Defendant, and any other exacerbating or mitigating factors.

MOREOVER, the Plaintiff demands exemplary and/or punitive damages in an amount no less than One Million Dollars (\$1,000,000), for this Defendant's willful and contumacious disregard for the Plaintiff's right to privacy and to be free from unwanted publicity, as well as the foreseeable impact the conduct alleged herein would have on Plaintiff's emotional and physical well-being and his personal and professional standing.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, along with any additional relief this Court deems appropriate and just given the circumstances and the legislative intent of the Act in question.

COUNT VIII
NONCONSENSUAL DISSEMINATION OF SEXUALIZED IMAGES
AGAINST MICHAEL W. GLOTZ

233. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, Paragraphs 98 through 118, and Paragraphs 174 through 182, as if fully restated in this Paragraph 233 of Count VIII.

234. Non-consensual dissemination of sexualized images, 720 ILCS 5/11-23.5(b), provides: that a person (or entity) commits non-consensual dissemination of digitally-altered sexual images when he or she: (1) intentionally disseminates an image of another person: (A) who is at least 18 years of age; and (B) who is identifiable from the image itself or information displayed in connection with the image; and (C) who is engaged in a sexual act or whose intimate parts are exposed, in whole or in part; and (2) obtains the image under circumstances in which a reasonable person would know or understand that the image was to remain private; and (3) knows or should have known that the person in the image has not consented to the dissemination.

235. Ironically, Senate Bill 1009 was sponsored by Sen. Hastings along with State Representative Scott Drury. The bill makes the non-consensual dissemination of obscene sexual images a Class 4 felony punishable by one (1) to three (3) years in prison. “This is an important modernization of our laws that will protect people’s lives and reputations from cyberbullying and intimidation,” Senator Hastings stated publicly.

236. In full force and effect at all relevant times, Illinois codified a private, civil cause of action pursuant to 740 ILCS 190/1 et seq., which governs Defendant Pawula’s dissemination of the Obscene Messages.

237. Under Illinois law, any images of a sexual nature that are shared without the consent of the parties in them can be classified as “revenge porn.”

238. The Illinois Supreme Court has recognized revenge porn as a “unique crime fueled by technology.” In an age where nearly everyone has access to cell phones and social media, the risk of

private or obscene images being distributed to unintended recipients has significantly increased. Notably, an individual can still be prosecuted for revenge porn even if the image was disseminated through means other than the internet.

239. The most devastating aspect for victims like the Plaintiff, is that once an obscene image is released into cyberspace or disseminated to the public at large via text message, it becomes virtually impossible to retrieve or erase. The internet's permanence ensures that such images are shared, saved, and reposted indefinitely, leaving the victim powerless to contain the spread.

240. Preventing its re-transmission or republication is entirely beyond the victim's control, as the offensive content is continuously circulated -- often without their knowledge or consent -- compounding the emotional and reputational harm inflicted with each new exposure.

241. The crime of obscenity prohibits the publication, distribution, or advertisement of "obscene" materials. While nudity alone is not enough to make pictures or video legally obscene, Illinois courts have consistently held that pictorial or written portrayals of nudity may be deemed obscene if accompanied by depictions of explicit sexual activity.

242. Obscenity, as contemplated by the statute, should be afforded its ordinary dictionary definition "disgusting to the senses" or "abhorrent to morality or virtue."

243. Material is considered obscene under the statute if: (1) the average person, applying contemporary adult community standards, would find that, taken as a whole, it appeals to the prurient interest; and (2) the average person, applying contemporary adult community standards, would find that it depicts or describes, in a patently offensive way, ultimate sexual acts or sadomasochistic sexual acts, whether normal or perverted, actual or simulated, or masturbation, excretory functions or lewd exhibition of the genitals; and (3) taken as a whole, it lacks serious literary, artistic, political or scientific value.

244. The Act reasonably contemplates victims depicted in sexually-explicit "deepfakes," including images manipulated digitally to portray obscene events.

245. In fact, Governor JB Pritzker signed a measure (H.B. 2123) clarifying that intentionally altered images are covered by existing laws against revenge porn, even if the images are digitally fabricated.

246. A perpetrator's defense that an obscene photo is unrealistic or unlikely to convince recipients that the act occurred is not valid under the statute.

247. Digitally altered images are often used by stalkers and offenders as part of broader attacks meant to humiliate, demean, and intimidate victims as retaliation.

248. Upon information and belief, with intent, malice, and premeditation, Defendant Glotz disseminated or publicized the Obscene Messages, which contain digitally altered, highly offensive images depicting Plaintiff in sexualized and compromising behavior with political allies.

249. The Plaintiff's face was deliberately interposed in the obscene image to ensure he was readily identifiable to anyone familiar with him or his public role as a longstanding state official.

250. Plaintiff had a legitimate expectation that, despite the existence of political critics and adversaries, no individual or entity would engage in the reprehensible act of fabricating obscene images using his likeness -- let alone fund, facilitate, or exploit distribution mechanisms -- to ensure such images received broad publicity.

251. The Obscene Messages, whether concocted or republished by Glotz, were engineered to tear down decades of Plaintiff's honorable service and personal sacrifice.

252. Upon information and belief, Defendant Glotz actively recruited and incited others to republish and spread the Obscene Messages to maximize the harm to Plaintiff's personal and professional standing.

253. Upon information and reasonable belief, Glotz made certain the Obscene Messages were disseminated throughout the State of Illinois, though Plaintiff's investigation continues.

254. The obscene and sexual nature of the images using Plaintiff's likeness brought dishonor to the Plaintiff and compromised the respect he had earned in his community over many decades.

255. Defendant Glotz knew or certainly should have known that Plaintiff did not -- and would never -- consent to the dissemination of the Obscene Messages.

256. Nevertheless, this Defendant, without Plaintiff's knowledge, consent, or authorization, enlisted third-party texting services to rapidly spread the Obscene Messages to a wide and vulnerable audience.

257. Upon information and belief, Glotz also employed "Signal," an end-to-end encrypted messaging service, to conceal his communications with his co-conspirators. Glotz's goal was to evade detection while executing a coordinated scheme to destroy Plaintiff's credibility and standing in the communities where he lives, works, and governs.

258. Defendant Glotz's publication of the Obscene Messages was a calculated act of malice, devoid of any good faith or newsworthy purpose, nor did it serve any legitimate public interest.

259. Glotz's goal was to degrade and humiliate the Plaintiff, weaponize public opinion for political gain, coerce Plaintiff's allies into abandoning their support, and pressure the Plaintiff into resigning from his position using tactics to impose fear, disgrace, and to force Hastings into isolation.

260. Glotz's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. It is believed that the harm extended across Hastings' political, legal, and social networks, jeopardizing longstanding relationships and professional opportunities.

261. Glotz effectively forced Plaintiff to exhaust significant time, effort, and financial resources to mitigate the harm caused by dissemination of the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

262. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of Glotz's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count VIII be entered against the Defendant, **MICHAEL W. GLOTZ**, an individual, in an amount fair and just, but no less than the greater of: (a) economic and noneconomic damages proximately caused by this Defendant's dissemination of Obscene Statements #1-3, including damages for emotional distress whether or not accompanied by other damages; or (b) statutory damages, not to exceed ten thousand dollars (\$10,000) for each and every distinct dissemination of an Obscene Image depicting Plaintiff. In determining the amount of statutory damages allowable under the Act, consideration shall be given to the sheer number of unique disseminations (or threatened disseminations) attributable to this Defendant, and any other exacerbating or mitigating factors.

MOREOVER, the Plaintiff demands exemplary and/or punitive damages in an amount no less than One Million Dollars (\$1,000,000), for this Defendant's willful and contumacious disregard for the Plaintiff's right to privacy and to be free from unwanted publicity, as well as the foreseeable impact the conduct alleged herein would have on Plaintiff's emotional and physical well-being and his personal and professional standing.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, along with any additional relief this Court deems appropriate and just given the circumstances and the legislative intent of the Act in question.

COUNT IX
NONCONSENSUAL DISSEMINATION OF SEXUALIZED IMAGES
AGAINST BIG TENT COALITION, LLC

263. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 96, Paragraphs 149 through 172, and Paragraphs 194 through 202, as if fully restated in this Paragraph 263 of Count IX.

264. Non-consensual dissemination of sexualized images, 720 ILCS 5/11-23.5(b), provides: that a person (or entity) commits non-consensual dissemination of digitally-altered sexual images when he or she: (1) intentionally disseminates an image of another person: (A) who is at least 18 years of age; and (B) who is identifiable from the image itself or information displayed in connection with the image; and (C) who is engaged in a sexual act or whose intimate parts are exposed, in whole or in part; and (2) obtains the image under circumstances in which a reasonable person would know or understand that the image was to remain private; and (3) knows or should have known that the person in the image has not consented to the dissemination.

265. Ironically, Senate Bill 1009 was sponsored by Sen. Hastings along with State Representative Scott Drury. The bill makes the non-consensual dissemination of obscene sexual images a Class 4 felony punishable by one (1) to three (3) years in prison. “This is an important modernization of our laws that will protect people’s lives and reputations from cyberbullying and intimidation,” Senator Hastings stated publicly.

266. In full force and effect at all relevant times, Illinois codified a private, civil cause of action pursuant to 740 ILCS 190/1 et seq., which governs Defendant Pawula’s dissemination of the Obscene Messages.

267. Under Illinois law, any images of a sexual nature that are shared without the consent of the parties in them can be classified as “revenge porn.”

268. The Illinois Supreme Court has recognized revenge porn as a “unique crime fueled by technology.” In an age where nearly everyone has access to cell phones and social media, the risk of

private or obscene images being distributed to unintended recipients has significantly increased. Notably, an individual can still be prosecuted for revenge porn even if the image was disseminated through means other than the internet.

269. The most devastating aspect for victims like the Plaintiff, is that once an obscene image is released into cyberspace or disseminated to the public at large via text message, it becomes virtually impossible to retrieve or erase. The internet's permanence ensures that such images are shared, saved, and reposted indefinitely, leaving the victim powerless to contain the spread.

270. Preventing its re-transmission or republication is entirely beyond the victim's control, as the offensive content is continuously circulated -- often without their knowledge or consent -- compounding the emotional and reputational harm inflicted with each new exposure.

271. The crime of obscenity prohibits the publication, distribution, or advertisement of "obscene" materials. While nudity alone is not enough to make pictures or video legally obscene, Illinois courts have consistently held that pictorial or written portrayals of nudity may be deemed obscene if accompanied by depictions of explicit sexual activity.

272. Obscenity, as contemplated by the statute, should be afforded its ordinary dictionary definition "disgusting to the senses" or "abhorrent to morality or virtue."

273. Material is considered obscene under the statute if: (1) the average person, applying contemporary adult community standards, would find that, taken as a whole, it appeals to the prurient interest; and (2) the average person, applying contemporary adult community standards, would find that it depicts or describes, in a patently offensive way, ultimate sexual acts or sadomasochistic sexual acts, whether normal or perverted, actual or simulated, or masturbation, excretory functions or lewd exhibition of the genitals; and (3) taken as a whole, it lacks serious literary, artistic, political or scientific value.

274. The Act reasonably contemplates victims depicted in sexually-explicit "deepfakes," including images manipulated digitally to portray obscene events.

275. In fact, Governor JB Pritzker signed a measure (H.B. 2123) clarifying that intentionally altered images are covered by existing laws against revenge porn, even if the images are digitally fabricated.

276. A perpetrator's defense that an obscene photo is unrealistic or unlikely to convince recipients that the act occurred is not valid under the statute.

277. Digitally altered images are often used by stalkers and offenders as part of broader attacks meant to humiliate, demean, and intimidate victims as retaliation.

278. Upon information and belief, the Big Tent Coalition, heavily funded by entities affiliated with Timothy Ozinga, played a central role in orchestrating a targeted campaign to commit the egregious acts prohibited under Section 740 ILCS 190/1 et seq.

279. Upon information and belief, Funds contributed to Big Tent were used, at least in part, to employ Defendant Pawula, who was at all relevant times the acting CEO and Chief Operating Officer of Big Tent. Pawula worked in coordination with Glotz to execute a smear campaign designed to tarnish the Plaintiff's reputation and compromise Plaintiff's personal and professional standing.

280. Unfettered access to Big Tent's robust financial resources enabled Pawula and Glotz to fulfill their conspiracy to defame, humiliate, and harass Plaintiff.

281. Defendant Timothy Pawula was an employee and agent of the Big Tent Coalition and acted at all relevant times pursuant to the direction and authority granted to him by his employer. The conduct at issue was germane and inextricably linked to the mission and objectives of the organization and its support of Patrick Sheehan and other Plaintiff-adverse candidates and officials.

282. Upon information and belief, Pawula acted pursuant to the direction, authority and/or subsequent ratification of Big Tent/Ozinga when he committed the alleged acts. Likewise, Pawula, and to some extent Glotz, exploited Big Tent's resources, which were necessary to commit the alleged acts and give the Obscene Messages broad publicity.

283. With intent, malice, and premeditation, Defendant Big Tent funded, disseminated, and/or publicized the Obscene Messages, which included doctored images and false narratives designed to convey the impression that Plaintiff engaged in unethical, unchaste, and immoral conduct.

284. The Plaintiff's face was deliberately interposed in the obscene image to ensure he was readily identifiable to anyone familiar with him or his public role as a longstanding state official.

285. Plaintiff had a legitimate expectation that, despite the existence of political critics and adversaries, no individual or entity would engage in the reprehensible act of fabricating obscene images using his likeness -- let alone fund, facilitate, or exploit distribution mechanisms -- to ensure such images received broad publicity.

286. The Obscene Messages, whether concocted or republished by Big Tent, were engineered to tear down decades of Plaintiff's honorable service and personal sacrifice.

287. Upon information and belief, the Big Tent Coalition, through its agents and assigns, actively recruited and incited others to republish and spread the Obscene Messages to maximize the harm to Plaintiff's personal and professional standing.

288. Upon information and reasonable belief, the Big Tent Coalition, through its agents and assigns, made certain the Obscene Messages were disseminated throughout the State of Illinois, though Plaintiff's investigation continues.

289. Those acting with the authority of the Big Tent Coalition knew or certainly should have known that Plaintiff did not -- and would never -- consent to the dissemination of the Obscene Messages.

290. Nevertheless, this Defendant, without Plaintiff's knowledge, consent, or authorization, enlisted third-party texting services to rapidly spread the Obscene Messages to a wide and vulnerable audience.

291. The Big Tent Coalition, through its agents and assigns including Pawula, also employed "Signal," an end-to-end encrypted messaging service, to conceal the communications

between co-conspirators. The Big Tent Coalition's goal was to evade detection while executing a coordinated scheme to destroy Plaintiff's credibility and standing in the communities where he lives, works, and governs.

292. Big Tent's publication of the Obscene Messages was a calculated act of malice, devoid of any good faith or newsworthy purpose, nor did it serve any legitimate public interest.

293. The Big Tent Coalition's goal was to degrade and humiliate the Plaintiff, weaponize public opinion for political gain, coerce Plaintiff's allies into abandoning their support, and pressure the Plaintiff into resigning from his position using tactics to impose fear, disgrace, and to force Hastings into isolation.

294. The Big Tent Coalition's role in the Defendants' coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. It is believed that the harm extended across Hastings' political, legal, and social networks, jeopardizing longstanding relationships and professional opportunities.

295. The Big Tent Coalition effectively forced Plaintiff to exhaust significant time, effort, and financial resources to mitigate the harm caused by dissemination of the Obscene Messages, put an end to the harassment, and fight to restore his dignity and once esteemed reputation.

296. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of the Big Tent Coalition's involvement in the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count IX be entered against the Defendant, **BIG TENT COALITION, LLC**, an Illinois Limited Liability Company, in an amount fair and just, but no less than the greater of: (a) economic and noneconomic damages proximately caused by this Defendant's dissemination of Obscene Statements

#1-3, including damages for emotional distress whether or not accompanied by other damages; or (b) statutory damages, not to exceed ten thousand dollars (\$10,000) for each and every distinct dissemination of an Obscene Image depicting Plaintiff. In determining the amount of statutory damages allowable under the Act, consideration shall be given to the sheer number of unique disseminations (or threatened disseminations) attributable to this Defendant, and any other exacerbating or mitigating factors.

MOREOVER, the Plaintiff demands exemplary and/or punitive damages in an amount no less than One Million Dollars (\$1,000,000), for this Defendant's willful and contumacious disregard for the Plaintiff's right to privacy and to be free from unwanted publicity, as well as the foreseeable impact the conduct alleged herein would have on Plaintiff's emotional and physical well-being and his personal and professional standing.

FURTHERMORE, Plaintiff prays that this Defendant be enjoined from any future, similar conduct, along with any additional relief this Court deems appropriate and just given the circumstances and the legislative intent of the Act in question.

COUNT X
CIVIL CONSPIRACY
AGAINST TIMOTHY PAWULA, MICHAEL W. GLOTZ
AND THE BIG TENT COALITION

297. Plaintiff re-alleges and incorporates by reference the allegations of Paragraphs 1 through 296, as if fully restated in this Paragraph 297 of this Count X.

298. To sustain a cause of action for civil conspiracy in Illinois, a lawsuit must allege: (1) a combination of two or more persons, (2) for the purpose of accomplishing by some concerted action either an unlawful purpose or a lawful purpose by unlawful means, (3) in furtherance of which one of the conspirators committed an overt tortious or unlawful act. The function of a conspiracy claim is to extend tort liability from the active wrongdoer to wrongdoers who may have only planned, assisted, or encouraged the active wrongdoer.

299. The essence of a conspiracy claim is not the agreement itself, but the tortious acts performed in furtherance of the agreement. It is only where means are employed, or purposes are accomplished, which are themselves tortious, that the conspirators who have not acted but have promoted the act will be held liable.

300. The victim of a conspiracy is not required to plead with complete particularity all details of a conspiracy or the exact role of each defendant in a conspiracy where a conspiracy, by its very nature, is purposefully shrouded in mystery.

301. Timothy Ozinga was, at all relevant times, the Chief Executive Officer and a major financier of the Big Tent Coalition, LLC, an organization he founded.

302. According to its website, Big Tent boasts it “is committed to restoring balance and fostering meaningful, intelligent political discourse” through “relationship-driven, targeted door-to-door campaigning,” and what it characterized as “superior data analysis.”

303. Ozinga is identified on its website as the organization’s Founder and Volunteer Chief Executive Officer and, at all relevant times, was identified as its Manager with the Illinois Secretary of State.

304. Upon information and reasonable belief, Ozinga donated in excess of \$300,000 to the Big Tent Coalition. Many of the donations were used to provide campaign workers, messaging, and other resources to the Patrick Sheehan for Senate Campaign.

305. Upon information and reasonable belief, Ozinga also donated \$266,500 to the Illinois Republican Party which, in turn, contributed significant in-kind contributions to Patrick Sheehan.

306. Upon information and reasonable belief, Ozinga further donated \$150,000 to the Republican State Leadership Committee IL-PAC, which was diverted to the Senate Republican Victory Fund, which then providing direct funding to Patrick Sheehan.

307. Sheehan has publicly acknowledged his gratitude to Ozinga and Big Tent: “I was left for dead until I teamed up with the Big Tent Coalition – led by Representative Tim Ozinga. They ran

my campaign, and I could not be more impressed with the talented team they put together. Their transparency and communication with me (considering I'm a first-time candidate, I know that doesn't often happen) kept my spirits and effort consistent..."

308. At all relevant times, Timothy Pawula served dual roles for Ozinga – the first as Chief of Staff and Treasurer to State Representative Timothy Ozinga, and the second as Chief Operating Officer for the Big Tent Coalition. Ozinga was the Big Tent's Chief Executive Officer at this time. Upon information and belief, the assumption of these roles violates the "revolving door policy" under the Illinois State Ethics Act.

309. Big Tent paid Pawula, who served as the Chief Operating Officer and as an agent/employee of the organization, to oversee and support these efforts. Pawula's conduct was far from rogue or unforeseeable.

310. As an employee and agent of Big Tent, Pawula acted under the supervision, and pursuant to the instruction and authority, of Big Tent making it vicariously liable for the conduct alleged hereunder and reincorporated into this Count X through Paragraph 342.

311. Defendant, Michael W. Glotz was, at all relevant times, Mayor of the Village of Tinley Park and Treasurer of "One Tinley Park," a political action committee. He was elected Mayor of Tinley Park in April 2021, after previously serving as a trustee and chairing the Public Works and Community Development committees. None of the conduct alleged against Glotz falls within the scope of Glotz's official duties or his responsibilities to the Village or to any political action committee.

312. Sheehan has publicly acknowledged Glotz, stating: "Thank you to Mayor Michael Glotz of Tinley Park for his efforts to galvanize the community behind me throughout the campaign..." Pawula is believed to have committed the alleged acts at the insistence of and in coordination with Glotz.

313. Upon information and belief, and at all relevant times, including from January 2022 to December 2022, Pawula/Big Tent, Glotz, and Sheehan frequently communicated with one another and concocted a plan to defeat Plaintiff in the General Election by unlawful and/or nefarious tactics.

314. Upon information and reasonable belief, Pawula/Big Tent, Glotz, and Sheehan deliberately used “Signal,” an end-to-end encrypted messaging platform, to orchestrate and conceal their scheme to harass Plaintiff and disseminate defamatory communications targeting Plaintiff and his constituency. By exploiting Signal’s encryption features, they ensured their actions remained hidden from scrutiny and to avoid accountability.

315. Upon information and belief, Glotz relies upon multiple alias email and social media accounts to degrade Hastings without reprisal. The aliases “Frankie Zielinski” and “Colonel McDowell” have been traced to an IP address associated with Glotz. Glotz used alias accounts to cover his tracks, deceive the public regarding the source of the speech, and evade accountability for his criminal behavior.

316. Upon information and belief, Glotz employs other aliases via social media to mask his identity and harass other elected officials throughout the south suburbs. These aliases, primarily used on Facebook, have been identified as: “Jack Harris,” “Kate Palmer,” “Tom Kaufman,” “Mary Bears,” “Barbara Jennings,” “Mike Jewlick,” and “Pamela Davis.”

317. It is believed that Pawula/Big Tent coordinated and conspired with Glotz to create and exploit these aliases in furtherance of the Defendants’ conspiracy to destroy Plaintiff’s reputation.

318. Upon information and belief, at some unknown point in 2024, the Illinois State Police launched a formal criminal investigation into the alleged conduct and the source of the Obscene Messages. The Illinois State Police conducted surveillance and targeted interviews at Big Tent’s headquarters in Mokena, Illinois.

319. During the investigation, Pawula was identified as a key suspect. Upon information and reasonable belief, the Illinois State Police identified other active participants in the planning,

coordination, and dissemination of the Obscene Messages targeting Plaintiff, as well as the underlying campaign to harass and intimidate Hastings.

320. Upon information and belief, Glotz and Pawula created the Obscene Messages and may have sought input from others before disseminating the same to the public at large.

321. Upon information and reasonable belief, the Illinois State Police identified the following individuals who may have been involved in the alleged efforts to disparage and/or humiliate Plaintiff, who was at all relevant times (and is currently) an acting state senator and a licensed member of the Illinois Bar: **Michael W. Glotz** (the current Mayor of the Village of Tinley Park); **Patrick Sheehan** (the current State Representative of the 37th Representative District); **Justin Krolik** (an individual acting in the scope of his employment with the Big Tent Coalition as its Data Director now elevated to Vice President of Operations, and also, the former Political Director to former Representative Timothy Ozinga); **Bryson George** (an individual acting in the scope of his employment with the Big Tent Coalition as its District Director now elevated to Director of Marketing and Sales); **Ben Benoit** (an individual acting in the scope of his employment with the Big Tent Coalition as a Data Analyst now elevated to Regional Director); **Greg O'Brien** (an individual then-acting in the scope of his employment with the Big Tent Coalition as its President); **Lucas Wadley** (an individual then-acting in the scope of his employment with the Big Tent Coalition as its System Administrator); and **David Ramirez** (a Principal of Michael Best Strategies LLC).

322. On April 8, 2024, Ozinga abruptly resigned from the Illinois House of Representatives, suspiciously timed just days after Illinois State Police executed a search warrant at Big Tent's headquarters.

323. Well before his resignation, however, Ozinga provided approximately \$1 million in funding to Big Tent, which was used, at least in part, to bankroll Plaintiff's political opponent, Patrick Sheehan, in his 2022 campaign to unseat Senator Hastings.

324. Upon information and belief, Ozinga funneled these funds through Ozinga Concrete Company, Ozinga for Illinois, and/or the Big Tent organization as financial conduits to support the fundraising efforts of his political allies.

325. In May of 2024, the Illinois Attorney General formally charged Pawula with two counts of harassment through electronic communication, one count of transmitting obscene messages, and one count of obscenity – all of which arise, at least in part, from the conduct described herein.

326. The charges accused Pawula of disseminating fabricated, sexually explicit images depicting Senator Hastings and Representative Bob Rita (D-Blue Island) in a deliberate effort to defame and degrade them. Upon information and reasonable belief, Pawula's actions were committed using the resources of Big Tent, and with Big Tent's authorization and subsequent ratification.

327. Ozinga's sudden departure amid the escalating investigation and subsequent indictment against his top operative raised serious questions about his knowledge of and involvement in the coordinated smear campaign.

328. On May 23, 2024, Ozinga, as CEO of Big Tent, acknowledged via SMS text message to Rich Miller of Capitolfax.com, that Pawula was his employee and that he was aware of Pawula's actions.

329. Upon information and reasonable belief, the Obscene Messages were financed, conceived, created, published, and/or ratified by the Defendants, including Pawula, Glotz, Big Tent, and several of Big Tent's principals and agents.

330. Upon information and reasonable belief, Pawula (in the scope of his employment with Big Tent) and Glotz brazenly communicated using a secure, end-to-end, encrypted messaging platform known as "Signal" to coordinate distribution of Obscene Images 1-3, as well as other vulgar depictions including those targeting Governor JB Pritzker.

331. Upon information and belief, the Defendants purposefully concealed their involvement by using aliases and third-party messaging services (i.e., Signal, i360 Marketing and Pinger, aka “Text Free”) to target thousands of Illinois residents.

332. Upon information and belief, over 200,000 text messages were sent by Defendants (or at their direction) over several months between 2022 and 2023 from spoofed phone numbers. Text message spoofing, also known as SMS spoofing, is a technique that alters the sender’s information in a text message to make it appear as if it came from someone else (either a real person or a fictitious one).

333. Upon information and belief, Glotz also exploited the Pinger/Text Free text messaging service to commit the offending acts alleged herein.

334. Upon information and belief, Glotz sent politically-charged text messages to residents throughout Tinley Park -- many of which were disparaging of Plaintiff. Ozinga contributed \$3,500 to Glotz during the same senate campaign cycle.

335. Upon information and belief, Glotz and Pawula created the Obscene Messages and may have sought input from others before disseminating the same to the public at large.

336. Upon information and belief, though the Plaintiff’s investigation continues, drafts of the Obscene Messages were sent to, *inter alia*, Justin Krolic (an individual acting in the scope of his employment with the Big Tent Coalition as its Data Director now elevated to Vice President of Operations, and also, the former Political Director to former Representative Timothy Ozinga); Lucas Wadley (an individual then-acting in the scope of his employment with the Big Tent Coalition as its System Administrator); and David Ramirez (a Principal of Michael Best Strategies LLC). The involvement and/or solicitation of key political operatives underscores the Defendant’s efforts to amplify the reach of the offending speech, as well as the damage sustained by their political adversary.

337. The Obscene Messages funded, created, and publicized in furtherance of the Defendants' conspiracy had no legitimate social or political value and served no purpose other than to harm the Plaintiff's reputation and standing within the community. Specifically,

- (a) the Obscene Messages were inflammatory and obscene, crafted solely to provoke outrage and incite negative emotions;
- (b) none of the Obscene Messages contributed to any meaningful or constructive public discourse regarding the Plaintiff's qualifications, political platform, or legislative record;
- (c) the Obscene Messages were published with actual malice, in that the Defendants knew their characterizations of the Plaintiff were false or, alternatively, they acted with reckless disregard for the truth, showing a deliberate intent to cause harm;
- (d) the Obscene Messages consisted of targeted personal attacks, designed to distract from substantive discussions on policy, governance, and community issues; and
- (e) the Obscene Messages were intended to publicly humiliate the Plaintiff, which in turn, undermined the public's trust in the democratic process and its respect for public officials elected to represent their interests.

338. The combination of efforts by Pawula, Glotz, and Big Tent demonstrates the lengths Plaintiff's adversaries will go to weaponize falsehoods and fabricate obscene images to manipulate the public's perception of Plaintiff for their own political agenda.

339. Defendants' coordinated efforts were driven by actual malice and executed as part of a calculated campaign to: (a) publicly humiliate the Plaintiff and reduce him to a subject of ridicule and contempt, (b) obliterate his reputation and standing within the community, (c) force him to abandon his candidacy through relentless harassment, and (d) inflict severe mental anguish and emotional torment -- not only as a means of political manipulation, but also for their own gratification and personal amusement.

340. The Defendants coordinated smear campaign caused Plaintiff to suffer profound distress, humiliation, and public disgrace. It is believed that the harm extended across Hastings' political, legal, and social networks, jeopardizing longstanding relationships and professional opportunities.

341. The Plaintiff suffered substantial damages, including, but not limited to, exorbitant legal fees, lost income and professional opportunities, as well as irreparable harm to his future earning capacity -- all as a direct and proximate result of the Defendants' conspiracy to cast Plaintiff in a false and unflattering light, decimate his reputation, interfere with his livelihood, and adversely impact his emotional and physical well-being.

342. The full scope of Pawula's, Glotz's, and the Big Tent's involvement remains inherently hidden and undiscoverable.

343. At the time of this filing, the Illinois State Police investigation was still pending and is not subject to FOIA or subpoena. The Plaintiff and his attorneys continue to investigate the full extent of Defendants' unlawful and conspiratorial conduct, and they seek to unveil any others who may be complicit.

WHEREFORE, the Plaintiff, **MICHAEL E. HASTINGS**, prays that a judgment under Count X be entered against the Defendants, **TIMOTHY PAWULA, MICHAEL W. GLOTZ** and the **BIG TENT COALITION**, jointly and severally, in an amount fair and just, but no less than One Million Dollars (\$1,000,000.00) in compensable and/or presumed damages, as well as exemplary damages in an amount no less than Five Million Dollars (\$5,000,000.00), for their willful and contumacious disregard for the Plaintiff's emotional and physical well-being, and the foreseeable impact their conduct would have on Plaintiff's personal and professional reputation and overall well-being.

FURTHERMORE, Plaintiff prays that these Defendants be enjoined from any future, similar conduct, and that they be ordered to promptly remove and/or retract any reference to the Obscene Messages made online, in writing, verbally or in any official document. Plaintiff seeks any additional relief this Court deems appropriate and just given the circumstances.

COUNT XI
RESPONDENTS IN DISCOVERY

344. Plaintiff incorporates the allegations of Paragraphs 1 through 343, as if fully restated in this Paragraph 344 of Count XI.

345. At all relevant times, Respondent Patrick Sheehan (“Sheehan”) opposed Plaintiff for State Senator of the 19th Legislative District during the November 2022 election. Sheehan has since been appointed to the 37th House District on April 12, 2024, to fill the vacancy of retiring Rep. Tim Ozinga. The 37th District comprises parts of Will and suburban Cook County.

346. At all relevant times, Respondent Lucas Wadley was employed by the Big Tent Coalition as its System Administrator. Upon information and reasonable belief, he is no employed or affiliated with Big Tent.

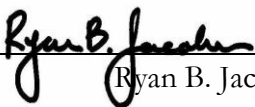
347. At all relevant times, Respondent Greg O’Brien was employed by the Big Tent Coalition as its President. Upon information and reasonable belief, he is no employed or affiliated with Big Tent.

ACCORDINGLY, Respondents in Discovery, **PATRICK SHEEHAN, LUCAS WADLEY**, and **GREG O’BRIEN**, and potentially others, are believed by Plaintiff to possess information essential to the proper resolution of this case, as well as the identities of the individuals and/or entities who should be named as additional Defendants in this action and held legally accountable to the Plaintiff for the damages he has sustained.

WHEREFORE, the Respondents are named herein pursuant to 735 ILCS 5/2-402, and they shall comply promptly with any written or oral discovery served upon them in conjunction with this lawsuit.

PLAINTIFF DEMANDS TRIAL BY JURY

Dated: FEBRUARY 28, 2025

By: _____
Ryan B. Jacobson, Esq,

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
SIXTH MUNICIPAL DISTRICT, LAW DIVISION

MICHAEL E. HASTINGS

Plaintiff,

v.

TIMOTHY PAWULA, MICHAEL W. GLOTZ,
and the BIG TENT COALITION, LLC,

Defendants,

PATRICK SHEEHAN, LUCAS WADLEY,
and GREG O'BRIEN,

Respondents in Discovery.

DOCKET NO.:
PRESIDING JUDGE:
JURY DEMAND FILED

AFFIDAVIT REGARDING DAMAGES SOUGHT

Ryan B. Jacobson, being first duly sworn under oath, asserts as follows:

1. That I am one of the attorneys of record for the Plaintiff in this matter; and
2. That the total money damages sought in this civil action exceeds the amount of fifty thousand dollars (\$50,000.00).

FURTHER AFFIANT SAYETH NOT.

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, I certify that the statements set forth in this Affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true

Dated: February 28, 2025

By: _____


Ryan B. Jacobson, Esq.,

Attorney for Plaintiff, MICHAEL E. HASTINGS

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