

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

**DIMITRY BAUM and MARIA BOYKO,**

**Plaintiffs,**

**v.**

**JEREMY DOZIER, JENNIFER ANDERSON,  
and ROBERT MEEDER,**

**Defendants.**

Case No. 06C 3189

**JURY TRIAL DEMANDED**

**DEFENDANT JENNIFER ANDERSON'S ANSWER  
AND AFFIRMATIVE DEFENSES**

NOW COMES Defendant, Jennifer Anderson, by and through her attorney, LISA  
MADIGAN, Illinois Attorney General, and hereby submits the following Answer and  
Affirmative Defenses to Plaintiff's complaint:

**Summary of Case**

1. This Complaint is for violations of 42 U.S.C. § 1983 resulting from actions taken by three Illinois State Troopers against a young couple in violation of their Fourth, Fifth, Eighth and Fourteenth Amendment rights under the United States Constitution. On the early morning of June 16, 2005, plaintiffs were returning to their homes in the Chicago suburbs when they momentarily pulled their car over on the northbound shoulder of Interstate Highway 94, near the Edens Spur Ramp, to talk. Shortly thereafter, Jeremy Dozier, an Illinois State Trooper, pulled up behind plaintiffs' car in his state police cruiser. Dozier, in uniform and armed, approached plaintiffs' car and unlawfully detained plaintiffs. After falsely detaining plaintiffs for questioning and falsely imprisoning them in their car, Dozier ordered plaintiffs to disrobe and walk into a wooded area adjacent to the highway where Dozier who pursued them (sic). However, when plaintiffs telephoned the police to report Dozier's actions, defendants Anderson and Meeder dispatched Dozier to meet with plaintiffs at a nearby gas station. Thus as a result of Anderson's and Meeder's actions, plaintiffs were further endangered and pursued by Dozier in violation of their rights under the United States Constitution.

**ANSWER:** Defendant Anderson admits Plaintiffs are bringing this action pursuant to 42 USC §1983. Defendant Anderson denies that she is an Illinois State Trooper, that she violated any of

Plaintiffs Fourth, Fifth, Eighth and Fourteenth Amendment rights under the U.S. Constitution. Defendant Anderson denies that she knew Dozier had detained Plaintiffs and engaged in the actions described in Paragraph 1. Defendant further denies that she knowingly dispatched Dozier to assist Plaintiffs' in spite of Plaintiffs' allegations against Dozier. Defendant Anderson lacks sufficient knowledge or information sufficient to form a belief as to the truth of the remaining statements in Paragraph 1.

**Parties**

2. Plaintiff Dimitry Baum is a United States Citizen and a resident of Chicago, Illinois. At all relevant times, he resided within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. At the time of the incident described in this Complaint, Dimitry was 22 years old and an undergraduate student at DePaul University.

**ANSWER:** Defendant Anderson lacks knowledge or information as to the truth of the allegations contained in Paragraph 2.

3. Plaintiff Maria "Masha" Boyko is a resident alien of the United States and a resident of Chicago, Illinois. At all relevant times, she resided within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. At the time of the incident described in this Complaint, Masha was 18 years old and she was training to become a ballet dancer.

**ANSWER:** Defendant Anderson lacks knowledge or information as to the truth of the allegations contained in Paragraph 3.

4. Dozier is a citizen of Beach Park, Illinois and he resides within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. Dozier is sued individually, and not in his official capacity as a Trooper for the Department of the Illinois State Police. However, at all relevant times, Dozier was employed as a Trooper for the Department of the Illinois State Police. As a result of his misconduct, Dozier has been suspended as a Trooper and is facing dismissal proceedings for his illegal acts. In addition, a Cook County criminal jury has already convicted him of four felony counts of bribery and four counts of felony misconduct for the incident involving plaintiffs.

**ANSWER:** Defendant Anderson lacks knowledge or information as to the truth of the allegations contained in Paragraph 4.

5. Defendant Anderson is a citizen of Illinois and resides within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. Anderson is sued individually, and not in her official capacity as a Trooper for the Department of the Illinois State Police. However, at all relevant times, Anderson was employed as a Trooper for the Department of the Illinois State Police. Anderson was suspended for 5 days without pay because of her conduct in the incident described here.

**ANSWER:** Defendant Anderson admits she is a citizen of Illinois and resides within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. Defendant Anderson denies she is a Trooper for the Department of the Illinois State Police and denies that at all relevant times was employed as a Trooper for the Department of the Illinois State Police. Defendant Anderson further denies she was suspended for 5 days without pay because of her conduct in the incident alleged in this complaint.

6. Defendant Meeder is a citizen of Illinois and he resides within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. Meeder is sued individually, and not in his official capacity as a Trooper for the Department of the Illinois State Police. However, at all relevant times, Meeder was an Illinois State Trooper for the Department of the Illinois State Police who directly supervised Dozier.

**ANSWER:** Defendant Anderson admits Defendant Meeder is employed by the Illinois State Police and was the direct supervisor of Defendant Dozier. Defendant Anderson lacks knowledge or information as to the truth of the allegations contained in Paragraph 6.

#### **Jurisdiction**

7. This action is brought under 42 U.S.C. § 1983 for violations of the Fourth, Fifth, Eighth, and Fourteenth Amendments of the United States Constitution and, therefore, this Court has jurisdiction pursuant to 28 U.S.C. § 1331.

**ANSWER:** Defendant Anderson admits the allegations contained in Paragraph 7.

#### **Venue**

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because all parties reside in this District and the facts giving rise to this cause of action occurred in this District.

**ANSWER:** Defendant Anderson admits the allegations contained in Paragraph 8.

### **BACKGROUND**

9. Dozier has a history of unlawfully detaining young couples and forcing them, against their will, to disrobe and perform various acts for his sexual stimulation. See *Poby v. Dozier, et al.*, Case No. 06 C 0647 (N.D.ILL., Judge James B. Zagel). Plaintiffs adopt and incorporate by reference those facts stated in the Complaint previously filed by Amanda Poby, on February 3, 2006, against Dozier, the Illinois State Police and the State of Illinois. A copy of the Complaint is attached as Exhibit A. As alleged in Ms. Poby's Complaint, on February 4, 2005, at approximately 1:00 a.m., Dozier pulled up in his state police cruiser behind her parked vehicle in the Gurnee Mills Shopping Center in Gurnee, Illinois. In uniform, Dozier approached Ms. Poby's vehicle and unlawfully detained her and her boyfriend. Dozier then ordered the two to disrobe and lay nude in the snow to make "snow angels" for his sexual stimulation.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to admit or deny the allegations in Paragraph 9.

10. On information and belief, on April 29, 2005, at approximately 10:55 a.m. Gregory Noble and Lydia Vetter were parked in a Hampton Inn parking lot near Illinois Highway 132 in Gurnee, Illinois. At the time, the couple was engaged in sexual activities. Dozier pulled up behind the couple in his state police cruiser and, in uniform, approached the couple's vehicle and unlawfully detained them. Dozier told the couple that they needed to be "punished" and then ordered the couple to strip naked and run around a nearby construction sight. Throughout the time that the young couple stripped and ran around the construction sight, Dozier kept his flashlight affixed to Lydia Vetter's naked body for his sexual stimulation.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to admit or deny the allegations in Paragraph 10.

### **Dozier's Unlawful Detention of Plaintiffs**

11. Plaintiffs Baum and Boyko were dating. On the early morning of June 16, 2005, plaintiffs were returning home from Chicago and traveling northbound on Interstate Highway 94 near the Edens Spur Ramp.

**ANSWER:** Defendant Anderson admits that individuals reported that they were traveling northbound on I-94 near the Edens Spur ramp in the early morning of June 16, 2005, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 11.

12. Although plaintiffs had had a small amount to drink that evening, neither was intoxicated. On their way home, plaintiffs were having a personal discussion and for their safety,

they had pulled over on the northbound shoulder of I-94, near the Edens Spur Ramp, to finish their conversation. Plaintiffs had also pulled over so Masha could urinate because the couple was on a highway and they were not close enough to any facilities to accommodate her.

**ANSWER:** Defendant Anderson admits individuals reported they pulled over on the NB I-94 shoulder but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 12.

13. Shortly after they pulled over to finish their conversation, plaintiffs noticed a state police cruiser traveling southbound on I-94 in the opposite direction of their travel. After passing them, the cruiser turned around cutting across the highway's northbound traffic and pulled up directly behind plaintiffs' vehicle.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13.

14. Dozier exited the state police cruiser dressed in full state trooper uniform and approached plaintiffs' car. Dozier requested plaintiffs to produce identification and demanded to know why they were pulled over. Dozier's illegal stop of plaintiffs was, in fact, a sham. Dozier had no intention of serving or protecting the public with his unlawful detention of plaintiffs and his detainment of plaintiffs was done without probable cause. As described below, Dozier's only goal that early morning was to satisfy his bizarre sexual desires and violate plaintiffs' Constitutional rights.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14.

15. At his request, Dimitry provided Dozier with identification, proof of insurance and the temporary registration to his car. Dimitry explained that they had pulled over the vehicle to talk and because Masha had to urinate, which she had already done. Dozier then requested identification and because Dimitry did not have his driver's license, he provided Dozier with his United States passport.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15.

16. Dozier took Dimitry's information and returned to his cruiser. Plaintiffs believed that Dozier was checking on Dimitry's driving record, however, plaintiffs were dead wrong. A short time later, Dozier came back to plaintiffs' vehicle and despite having done nothing illegal, Dozier ordered Dimitry to his police cruiser, while he ordered Masha to stay in Dimitry's car. Plaintiffs complied with Dozier because he was armed.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16.

17. Dozier detained Dimitry in the front passenger seat of his police cruiser. While he was detained, Dimitry noticed his identification, proof of insurance and the temporary registration sitting on the dashboard of the cruiser and that Dozier had not even turned on his state trooper computer to check on Dimitry's background. Dimitry also noticed that the video camera mounted to the dashboard of the cruiser was not turned on and that the trooper's CB radio was not turned on either.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17.

18. Dozier then gave Dimitry an alcohol breathalyzer test which Dimitry passed. While administering the breathalyzer, Dozier questioned Dimitry about where the couple had been that evening. Dimitry explained that they had been in downtown Chicago and that they were coming from a nightclub.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18.

19. Dozier then left Dimitry sitting in his police cruiser and went back to Dimitry's car where Masha was sitting. Dozier demanded identification from Masha. She produced her social security card and explained that she was 18 years old. Dozier then also forced Masha to take a breathalyzer test which he claimed she failed. Neither Masha nor Dimitry saw the results of the test given to Masha.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19.

20. Dozier then returned to his cruiser where Dimitry was sitting and informed him that he intended on giving citations to Masha for public urination and public intoxication and that Dimitry would receive a ticket for contributing to the delinquency of a minor for providing her with alcohol. Dimitry, of course, had not provided any alcohol to Masha and Dozier's accusation was unfounded. Dozier then told Dimitry that they needed to "do something to learn a lesson." At this suggestion, Dimitry volunteered that he would do community service if Dozier thought it appropriate. Dozier said that he would still have to issue tickets in order for plaintiffs to receive community service as a sentence. Dozier then returned to Dimitry's vehicle where Masha was sitting.



**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20.

21. When Dozier returned to Masha, he shined his flashlight directly on her chest and breast when he spoke to her. Dozier told Masha that he intended to give her a ticket for public urination, but that perhaps he would not have to if she "did something to learn a lesson." At this request, Masha volunteered that she would do community service. Dozier then told her no and that she was going "to have thing of something embarrassing" to do. Dozier then began to chuckle and left Masha and returned to Dimitry sitting in his police cruiser.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21.

22. When Dozier returned to his police cruiser, he asked Dimitry if he had come up with a fitting punishment. Dimitry noticed that Dozier was fidgeting and nervous when he asked the question. Dimitry stated that he did not know what Dozier wanted. At this time, Masha stepped out from Dimitry's car and told Dozier that she needed to urinate again. Dozier returned to Masha and asked her if she had come up with a proper punishment. Dozier again was shining the flashlight directly on Masha's breast and he was fidgeting and chuckling when he asked this question.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22.

23. Masha was scared at the conduct of Dozier and in a defensive reaction, she stated sarcastically "What do you want me to do? Strip and run across the highway?" Dozier quickly replied that she "would not have to run across the highway" and then quickly returned to Dimitry in the police cruiser.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23.

24. Dozier told Dimitry that Masha had offered to strip. Dozier then told Dimitry that he and Masha had to strip and run into a wooded area adjacent to the highway. Dozier also asked Dimitry if he would agree to this "punishment." Just as before, Dozier was fidgeting and chuckling when he asked this question. Like Masha, Dimitry was also scared at the conduct of Dozier and he was acutely aware of the fact that Dozier was armed and that they were alone on the highway. Dimitry stated that he would do what the Dozier had commanded and he asked if he could return to his car. Dozier allowed Dimitry to return to his car.

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24.

25. Upon getting back into his own vehicle, Dmitry found Masha, who was, obviously, terrified. In Russian, Dmitry told Masha that he did not believe that Dozier was a real police officer and that they should just do what he wanted and then leave. Both plaintiffs had cellular phones and each attempted to phone for help when they were together again in their car. Plaintiffs phoned their friends and attempted to contact the police through the 911 emergency system to tell what was happening to them. When Dmitry phoned the police, he spoke with Jennifer Anderson, a dispatcher for the Illinois State Police. Dmitry explained that they had been pulled over and that he believed that the police officer was an impersonator. Dmitry requested that Anderson dispatch another officer to them for help which Anderson refused to do.

**ANSWER:** Defendant Anderson denies she is a dispatcher for the Illinois State Police, denies she ever spoke with Dmitry, and denies she refused to dispatch an officer for assistance to plaintiffs. Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 25.

26. While plaintiffs were calling for help, Dozier approached their car and again demanded that they disrobe and run into the wooded area adjacent to the highway. Plaintiffs began to comply and both stripped to their underwear, while they were still talking on their cellular phones. Plaintiffs were terrified that Dozier would shoot, rape and/or kill them after they disrobed. Dozier then demanded that Masha take off her bra and panties and that they both hang up their cellular phones. Realizing that no one would be able to come to their rescue in time, Masha told Dmitry in Russian: "Put the car in drive and go."

**ANSWER:** Defendant Anderson lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26.

27. When Masha told him to go, Dmitry grabbed his keys from the front seat, put them in the ignition and pressed his accelerator to the floor. Plaintiffs' car sped off of the shoulder of the highway with the driver's door still open. In the meantime, Dozier ran back to his car and gave chase to plaintiffs. Plaintiffs' car was going over 70 miles per hour and they were able to elude Dozier, but only temporarily.

**ANSWER:** Defendant Anderson lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 27.



**Anderson's and Meeder's Misconduct**

28. When Dimitry and Masha escaped from Dozier, Dimitry immediately called the police again using his cellular phone. While driving northbound on I-94, Dimitry attempted to explain to the police what had just happened. Upon information and belief, Dimitry was ultimately connected again to Anderson. Dimitry explained that they had been pulled over, forced to disrobe and that they had been falsely arrested by Dozier. Anderson responded that State Troopers "don't make false arrests." She then commanded plaintiffs to go to the Lake Forest Oasis, which is a car service plaza located just off I-94, near Lake Forest, Illinois. Plaintiffs obeyed Anderson's commands and proceeded to the location.

**ANSWER:** Defendant Anderson denies speaking to plaintiffs on the phone and denies making any of the statements contained in Paragraph 28 attributed to her, and denies directing plaintiffs to go to the Lake Forest Oasis. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 28.

29. Upon information and belief, Anderson then contacted Dozier who confirmed that he was near where plaintiffs had been stopped and that he was also near the Lake Forest Oasis. Upon further information and belief, Meeder was also contacted by Anderson and he was informed of what had just happened to plaintiffs and that they were proceeding to the Lake Forest Oasis. Upon further information and belief, Anderson then dispatched Dozier to go meet plaintiffs at the Lake Forest Oasis. Anderson dispatched Dozier, at the command and consent of Meeder, and in doing so, Anderson and Meeder facilitated, condoned and knowingly participated in the violations of plaintiffs' Constitutional rights. In the alternative, faced with the fact that Dozier had just been in the immediate area where plaintiffs had been stopped and forced to disrobe, by a law enforcement official, Anderson and Meeder turned a blind eye because they knew that Dozier was the person who had just detained plaintiffs. Anderson and Meeder deliberately and with reckless indifference sent Dozier again to plaintiffs with the knowledge that he would further violate plaintiffs' Constitutional rights.

**ANSWER:** Defendant Anderson admits she dispatched the trooper assigned to the area, who happened to be Dozier, to meet plaintiffs at the Lake Forest Oasis, but denies the remaining allegations paragraph 29.

30. After they reached the Lake Forest Oasis, plaintiffs stopped at the gas pumps located near the main cashier's building. Plaintiffs waited in their car for help from the police. Shortly after plaintiffs arrived, Dozier pulled in to the gas pump area, thus blocking off plaintiffs' only visible exit. Upon seeing Dozier's car and realizing that he was the same state trooper who had just tried to harm them plaintiffs drove away from the cruiser to the other side of the Oasis. Miraculously, when plaintiffs drove in the opposite direction from Dozier, they found a second, hidden exit from the Oasis on to northbound Interstate Highway 294. Again

Dozier chased plaintiffs in his cruiser, but plaintiffs were able to elude capture. Dozier blocked off what he thought was plaintiffs only escape route at the Lake Forest Oasis and he chased plaintiffs with the intent to capture them in order to make them disrobe again for his sexual stimulation, just as he had made them do before.

**ANSWER:** Defendant Anderson lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 30.

31. After the chase, plaintiffs contacted the Libertyville Police department through the 911 emergency system and informed them that the same state trooper who had detained them before chased them from the Lake Forest Oasis. Ultimately, plaintiffs returned home and were able to assist the police in identifying Dozier who admitted to his actions described in this Complaint. As a result of defendants' actions, plaintiffs have sought counseling for their psychological injuries, in addition to the other injuries described below.

**ANSWER:** Defendant Anderson lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 31.

### **Count I**

#### **Demand for Relief for Violations of 42 U.S.C. §1983 Against Defendant Dozier**

32. Plaintiffs restate and reallege Paragraphs 1 through 31 above.

**ANSWER:** Defendant Anderson restates and realleges her responses to Paragraphs 1 through 31 above.

33. Based on the acts described above, plaintiffs were unlawfully and unreasonably detained by Dozier who acted without probable cause to believe that an offense was committed by plaintiffs. Plaintiffs were also deprived of their liberty by Dozier, without due process of law. Additionally, plaintiffs suffered cruel and unusual punishment as a result of Dozier's action.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

34. Dozier' actions were done under color of state law and he violated plaintiffs' Constitutional rights under the privileges and immunities secured by the Fourth, Fifth and Eighth Amendments, as applied to the States by the Fourteenth Amendment, to the Constitution of the United States of America, in violation of 42 U.S.C §1983.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

35. As a result of these violations, plaintiffs have suffered humiliation, degradation, physical false imprisonment, physical injuries and pecuniary damages.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

36. Dozier's acts were reckless, callous, wonton and malicious warranting the award of punitive damages.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

## **Count II**

### **Demand for Relief for Violations of 42 U.S.C. §1983 Against Defendant Anderson**

37. Plaintiffs restate and reallege Paragraphs 1 through 36 above.

**ANSWER:** Defendant Anderson restates her responses contained in paragraphs 1 through 36 above.

38. Based on the acts described above, Anderson personally participated in the conduct that violated plaintiffs' rights. Because of her actions, plaintiffs were unlawfully detained by Dozier in the Lake Forest Oasis and as a result they were further deprived of their liberty and suffered cruel and unusual punishment. Anderson either knowingly, or with deliberate and reckless indifference, facilitated, condoned or turned a blind eye to Dozier's violations of plaintiffs' Constitutional rights under the privileges and immunities secured by the Fourth, Fifth and Eighth Amendments, as applied to the States by the Fourteenth Amendment, to the Constitution of the United States of America, in violation of 42 U.S.C. §1983.

**ANSWER:** Defendant Anderson denies that she knowingly, or with deliberate and reckless indifference, participated in any conduct that violated plaintiffs rights. Defendant Anderson denies that she facilitated, condoned or turned a blind eye to Dozier's conduct and alleged constitutional and statutory violations of plaintiffs.

39. As a result of these violations, plaintiffs have suffered humiliation, degradation, physical imprisonment, physical injuries and as pecuniary damages.

**ANSWER:** Defendant Anderson denies the allegations in Paragraph 39.

40. Anderson's acts were reckless, callous, wonton and malicious warranting the award of punitive damages.

**ANSWER:** Defendant Anderson denies the allegations contained in Paragraph 40.

**Count III**

**Demand for Relief for Violations of 42 U.S.C. §1983  
Against Defendant Meeder**

41. Plaintiffs restate and reallege Paragraphs 1 through 39 above.

**ANSWER:** Defendant Anderson restates and realleges her responses to paragraphs 1 through 39 above.

42. Based on the acts described above, Meeder personally participated in the conduct that violated plaintiffs' rights. Because of his actions, plaintiffs were unlawfully detained by Dozier in the Lake Forest Oasis and as a result they were further deprived of their liberty and suffered cruel and unusual punishment. Meeder either knowingly, or with deliberate and reckless indifference, facilitated, condoned or turned a blind eye to Dozier's violations of plaintiffs' Constitutional rights under the privileges and immunities secured by the Fourth, Fifth and Eighth Amendments, as applied to the States by the Fourteenth Amendment, to the Constitution of the United States of America, in violation of 42 U.S.C. §1983.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

43. As a result of these violations, plaintiffs have suffered humiliation, degradation, physical imprisonment, physical injuries and pecuniary damages.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

44. Meeder's acts were reckless, callous, wonton and malicious warranting the award of punitive damages.

**ANSWER:** Count I is not directed at Defendant Anderson, therefore no answer is provided.

**RELIEF REQUESTED**

Defendant Anderson denies that Plaintiffs are entitled to any relief in this matter as claimed against her.

**AFFIRMATIVE DEFENSES**

1. Defendant Anderson is entitled to qualified immunity as her conduct was objectively reasonable and did not violate any of Plaintiffs' clearly established constitutional rights.
2. Plaintiff's claims for punitive damages are barred because at all times relevant, Defendant Anderson acted in good faith and without malice or intent to injure Plaintiffs.

Respectfully submitted,

LISA MADIGAN  
Illinois Attorney General

/s/ Elizabeth M.S. Looby  
Elizabeth M. S. Looby  
Senior Assistant Attorney General  
The Illinois State Toll Highway Authority  
2700 Ogden Avenue  
Downers Grove, IL 60515  
(630) 241-6800, Ext. 1520