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 MICHAEL W. DOBBINS
 CLERK, U.S. DISTRICT COURT

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.

) 06CV3189
)
) JUDGE HIBBLER
) MAGISTRATE VALDEZ
)
)
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)
)
)
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JURY TRIAL DEMANDED

COMPLAINT

Plaintiffs Dimitry Baum and Maria "Masha" Boyko, by their attorneys, state as follows:

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 was pursuing them. 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.

Parties

2. Plaintiff Dmitry 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, Dmitry was 22 years old and an undergraduate student at DePaul University.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

15. At his request, Dmitry provided Dozier with identification, proof of insurance and the temporary registration to his car. Dmitry 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.

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.

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.

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.

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.

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.

21. When Dozier returned to Masha, he shined his flashlight directly on her chest and breasts 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 think of something embarrassing" to do. Dozier then began to chuckle and left Masha and returned to Dimitry sitting in his police cruiser.

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 breasts and he was fidgeting and chuckling when he asked this question.

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.

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.

25. Upon getting back into his own vehicle, Dimitry found Masha, who was, obviously, terrified. In Russian, Dimitry 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 Dimitry phoned the police, he spoke with Jennifer Anderson, a dispatcher for the Illinois State Police. Dimitry explained that they had been pulled over and that he believed that the police officer was an impersonator. Dimitry requested that Anderson dispatch another officer to them for help which Anderson refused to do.

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 Dimitry in Russian: "Put the car in drive and go."

27. When Masha told him to go, Dimitry 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.

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.

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.

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.

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.

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.

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.

34. Dozier's 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.

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

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

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.

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.

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

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

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.

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.

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

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

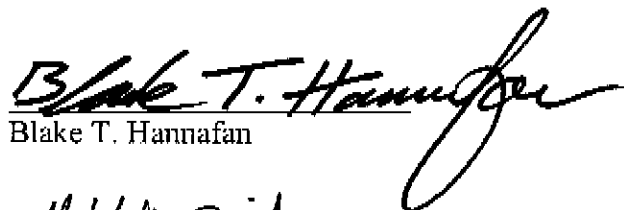
JURY TRIAL DEMAND


45. Plaintiffs demand a jury trial on all counts.

PRAYER FOR RELIEF TO ALL COUNTS

WHEREFORE, plaintiffs respectfully request that the Court enter judgment in their favor and against all defendants for compensatory damages, punitive damages and attorney's fees in an amount to be determined at trial and for such further and other relief as this Court deems just and equitable.

Respectfully submitted,


Blake T. Hannafan


Nicholas A. Pavich
On behalf of Plaintiffs
Dimitry Baum and Maria Boyko

Dated June 12, 2006

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Case 1:06-cv-00647 Document 1 Filed 02/03/2006 Page 1 of 7

2

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**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AMANDA POBY,

Plaintiff,

vs.

JEREMY DOZIER,
ILLINOIS STATE POLICE,
STATE OF ILLINOIS,

Defendants.

No.

06C 0647

Jury Demand

JUDGE ZAGEL**MAGISTRATE JUDGE DENLOW**COMPLAINT

1. The jurisdiction of this Honorable Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. 1983 and 1988; 28 U.S.C. 1331 and 1323 (3); and the Constitution of the United States, and supplement jurisdiction under 28 U.S.C. Section 1367.

2. The Plaintiff, at all times herein, was a citizen of the United States and a resident of the City of St. John, Indiana:

3. Defendant Police Officer Jeremy Dozier (Dozier) is employed by the State of Illinois, in the Department of the Illinois State Police. At all times relevant to this Complaint, he was acting within the scope of his employment and under color of law and under the supervision of agents and supervisors of the Illinois State Police and the State of Illinois.

4. Defendants, State of Illinois and the Illinois State Police and were at all times relevant to the Complaint, the employer and supervising authority of Jeremy Dozier, Illinois State Trooper:

FACTS

5. That on February 4, 2005, at approximately 1:00 a.m., the Plaintiff in a vehicle owned by her, and was parked at or near Gurnee Mills Shopping Center, Gurnee, Lake County, Illinois:

6. That while Plaintiff was in the vehicle with Chris Ryan Pierce, she was approached by Defendant, Jeremy Dozier, an Illinois State Trooper:

7. That at all times herein, the Defendant, Jeremy Dozier, was in the exercise of the authority granted to him by the State of Illinois and the Illinois State Police Department, and was operating under the supervision and authority of one or more agents of the Illinois State Police Department:

8. That Defendant Jeremy Dozier, pursuant to the aforementioned authority, detained and ordered the Plaintiff and Chris Ryan Pierce to remain nude and unclothed in the vehicle, and proceeded to repeatedly and continuously shine a flashlight on the Plaintiff's body, including a and interior search of the front seat floor area where Plaintiff sat in the nude:

9. That Defendant Dozier then ordered Plaintiff and Chris Ryan Pierce to exit the vehicle, and further ordered them to lay in the snow, while nude, and further ordered them to perform certain physical movements in the snow for the purpose of the sexual gratification of Defendant Dozier:

10. That during the conduct described in the foregoing paragraph, the Defendant trained his flashlight on the Plaintiff's body:

11. That Defendant thereafter left the scene:

12. That the Defendants, State of Illinois and Illinois State Police, knew or should have known of the propensities of the conduct of Defendant Dozier, and despite having notice, failed to protect the public at large, particularly the Plaintiff, Amanda Poby:

13. That at all times herein, it was the practice, custom and design of the Defendant, State of Illinois and the Illinois State Police who are legally responsible for and thereby permitted the conduct complained of to occur, and by their notice and knowledge acquiesced in the conduct of the police officers herein.

COUNT I

Section 1983 Claim vs. Defendant Jeremy Dozier

1.-13. The Plaintiff realleges paragraphs One (1) through Thirteen (13) as though fully set forth herein.

14. The actions of Defendant Jeremy Dozier, in detaining Plaintiff, and forcing Plaintiff to perform certain actions as described above, violated her Fourth Amendment rights to be free from unreasonable searches and seizures and excessive and abusive exercise of police force and authority.

WHEREFORE, the Plaintiff Amanda Poby, prays for an order as follows:

- A. An award of Compensatory Damages in favor of Plaintiff an against the Defendant Jeremy Dozier.
- B. An award of Punitive Damages in favor of Plaintiff and against the Defendant, Jeremy Dozier.
- C. An award of reasonable attorneys fees and costs in favor of Plaintiff and against Defendant, Jeremy Dozier.
- D. Any other relief this Honorable Court deems just and equitable.

COUNT II

Section 1983 Claim vs. State of Illinois

1-14. The Plaintiff realleges paragraphs One (1) through Fourteen (14) as though fully set forth herein.

15. That at all times herein, Police Officer Jeremy Dozier was acting as agent for, and with the authority vested in him by the State of Illinois, and was in the scope of his employment duties and operating under cover of law and authority granted to him by the State of Illinois:

16. That at all times herein, unknown agents and supervisors of the State of Illinois and the Department of Illinois State Police, had actual and constructive notice of the propensities of the Defendant, Jeremy Dozier.

WHEREFORE, the Plaintiff, Amanda Poby, prays for an order as follows:

- A. An award of Compensatory Damages in favor of Plaintiff and against Defendant, State of Illinois.
- B. An award of reasonable attorneys fees and costs in favor of Plaintiff and against Defendant, State of Illinois.
- C. Any other relief that this Honorable Court deems just and equitable.

COUNT III

Section 1983 Claim vs. Illinois State Police

1.-16. The Plaintiff repeats and realleges paragraphs One (1) through Sixteen (16) of this Complaint as paragraphs One (1) through Sixteen (16) of this Count Three of this Complaint:

17. That the Defendant Illinois State Police, is a police authority formed and incorporated by the State of Illinois, and empowered, supervised, and controlled the Defendant, Jeremy Dozier:

18. That the Defendant, Illinois State Police, had actual and constructive notice of the propensities of the conduct by Defendant Dozier, as described and complained of in this Complaint:

COUNT IV

State Claim for Respondeat Superior vs. State of Illinois and Illinois State Police

False Imprisonment

1-18. The Plaintiff realleges paragraphs One (1) through Eighteen (18) of this Complaint as paragraphs One (1) through Eighteen (18) of this count as though fully set forth herein.

19. That the Defendant, Jeremy Dozier, unlawfully detained the Plaintiff, and falsely imprisoned the Plaintiff, against her will.

20. That the aforesaid actions of Defendant Jeremy Dozier, while employed as an Illinois State Trooper, in detaining the Plaintiff was done within the Scope of his employment and was committed willfully and wantonly, and the State of Illinois and the Illinois State Police Department, as the Principals of the Defendant Dozier, is liable for his actions under the doctrine of Respondeat Superior.

WHEREFORE, the Plaintiff, Amanda Poby, prays for an order as follows:

- A. An award of Compensatory Damages in favor of Plaintiff and against Defendants, State of Illinois and Department of State Police;
- B. An award of reasonable attorneys fees and costs.
- C. Any other relief that this Honorable Court deems just and equitable.

COUNT VI

Pendent State Claim for False Imprisonment vs. Jeremy Dozier

1.-19. The Plaintiff repeats and realleges paragraphs One (1) through Twenty (20) of this Complaint as paragraphs One (1) through Nineteen (19) of this count of this Complaint:

WHEREFORE, the Plaintiff, Amanda Poby, respectfully prays for an order as follows:

- A. An award of Compensatory damages for False Imprisonment;
- B. An award of Punitive damages for False Imprisonment;
- C. An award of reasonable attorney's fees and costs;
- D. Any other relief the Court deems appropriate.

COUNT VII

Pendent State Claim for Intentional Infliction of Emotional Distress

The Plaintiff repeats and realleges paragraphs One (1) through Nineteen (19) of this Complaint as paragraphs One (1) through Nineteen (19) of this Count Seven of this Complaint;

20. That the conduct of the Defendant, Jeremy Dozier, was extreme, outrageous and intentional and was calculated to inflict severe emotional distress upon the Plaintiff;

WHEREFORE, the Plaintiff, Amanda Poby, prays for an order as follows:

- A. An award of compensatory damages for the intentional infliction of Emotional Distress;
- B. An award of Punitive Damages for the extreme and outrageous conduct of Defendant;
- C. An award of reasonable attorney's fees and costs;
- D. Any other relief that this Court deems just and equitable.

Respectfully Submitted



Phillip J. Bartolementi
Attorney for Plaintiff.

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p.2

I, Amanda Popy, on oath state that the foregoing information contained in the Complaint is true and correct to the best of my knowledge.

Subscribed and Sworn to
Before me this 2nd day
of February, 2006
State of Indiana
County of Randolph

Amanda Popy
Amanda Popy

Beverly S. Hildreth
Notary Public
Beverly S. Hildreth
My Commission Expires: 8/1/09