

IN THE CIRCUIT COURT  
TWENTIETH JUDICIAL CIRCUIT OF ILLINOIS  
ST. CLAIR COUNTY

BRANDY N. CLARK, )  
 )  
 Plaintiff, )  
 )  
 vs. ) Case No. 20-L-0790  
 )  
 CLEMENTS CLEANING, INC., )  
 )  
 Defendant. )

**COMPLAINT**

COMES NOW Plaintiff Brandy Clark, by her attorneys, St. Clair, Gilbreth & Steppig LLC, and for her Complaint against Clements Cleaning, Inc., states as follows:

1. Plaintiff Brandy N. Clark is a resident of the City of Waterloo, Monroe County, Illinois.
2. Defendant Clements Cleaning, Inc. is an Illinois corporation doing business in St. Clair County, Illinois.
3. At all times relevant hereto, Angela Clements and Brandy Clements were agents, employees, and managers of, and working while in the course and scope of their employment for, Defendant Clements Cleaning, Inc.
4. Plaintiff was employee of Defendant from June 6, 2019 through October 14, 2019.
5. In approximately August 2019, Plaintiff began having physical symptoms as a result of her exposure to cleaning chemicals while working in the course and scope of her employment for Defendant both inside and outside of St. Clair County, Illinois.
6. Plaintiff thereafter advised Angela Clements on several occasions of the symptoms she was having as a result of these exposures.

7. On September 20, 2019, Plaintiff, again while working in the course and scope of her employment for Defendant, began having severe symptoms as a result of her exposure to chemicals.

8. Because of these symptoms, Plaintiff was required to seek medical attention for respiratory issues on September 23, 2019.

9. On approximately September 25, 2019, Plaintiff was again exposed to chemicals while working in the course and scope of her employment for Defendant at a home in St. Clair County, Illinois.

10. As a result of this exposure, Plaintiff was required to seek medical attention once more, and was subsequently hospitalized for seven days.

11. Plaintiff was permitted to return to work by her attending physician on October 14, 2019.

12. Plaintiff thereafter advised Angela Clements that she could return to work. She was thereafter scheduled to return to work on October 16, 2019.

13. Prior to Plaintiff's return, Plaintiff was terminated by Brandy Clements on October 14, 2019.

14. At all times relevant hereto, Defendant was aware of Plaintiff's exercise of her rights granted by the Illinois Workers' Compensation Act, 820 ILCS 305/1 et seq. (the "Act").

15. Defendant terminated Plaintiff's employment in retaliation for her having exercised her rights and remedies granted to her by the Act.

16. In so doing, Defendant violated Section 4(h) of the Act.

17. As a direct and proximate result of Defendant's retaliatory discharge, Plaintiff lost wages and will continue to lose wages in the future. Furthermore, Plaintiff has suffered a great deal of emotional pain, suffering, embarrassment, humiliation, and distress.

18. Defendant, by and through its managerial employees, willfully, wantonly, and intentionally performed all of the acts complained of herein.

WHEREFORE, Plaintiff Brandy Clark prays this Court award judgment in her favor and against Defendant Clements Cleaning, Inc. for compensatory damages in excess of \$50,000.00, punitive damages, reasonable attorney's fees, her costs of suit, and such additional relief as this Court deems just and proper under the circumstances.

ST. CLAIR, GILBRETH & STEPPIG LLC

/s/Clay B. St. Clair

Clay B. St. Clair #6273497

Attorneys for Plaintiff Brandy Clark

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