

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

DOMINIC ZUCCHERO, individually and derivatively )  
on behalf of MR BEEF ON ORLEANS, INC. an Illinois )  
corporation and JJD, INC., an Illinois corporation )

Plaintiff, )

v. )

MR BEEF ON ORLEANS, INC. and Illinois corporation; )  
LAUREN ZUCCHERO, individually, and as )  
administrator of the ESTATE OF JOSEPH Z ZUCCHERO, )  
deceased; CHRISTOPER ZUCCHERO, individually; )  
CAMILLE ZUCCHERO, individually; JJD, Inc., an )  
Illinois corporation; and MR BEEF LLC, an Illinois )  
limited liability company, )

Defendants. )

No: 2024CH00786

**COMPLAINT FOR ACCOUNTING AND OTHER RELIEF**

NOW COMES the Plaintiff, DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF ON ORLEANS, INC. and JJD, Inc., by and through his attorneys, DONNELLY LAW LLC and for his Complaint against Defendants MR BEEF ON OREANS, INC., an Illinois corporation, LAUREN ZUCCHERO, individually and as administrator of the ESTATE OF JOSEPH Z ZUCCHERO, deceased, CHRISTOPHER ZUCCHERO, individually, CAMILLE ZUCCHERO, individually, JJD, INC., an Illinois corporation, and MR BEEF LLC, an Illinois limited liability company, states and alleges as follows:

**PARTIES**

1. Plaintiff, DOMINIC ZUCCHERO (hereinafter “DOMINIC”), is a citizen of the State of Arizona. Upon information and belief, he is a 33.33% minority shareholder of MR. BEEF ON ORLEANS, INC. At all relevant times, DOMINIC was also a minority shareholder of JJD,

FILED DATE: 2/7/2024 10:00 AM 2024CH00786

Inc.

2. Defendant, MR. BEEF ON ORLEANS, INC. (hereinafter “MR. BEEF”) is an Illinois Corporation since January 20, 1966. MR BEEF has no shares listed on a national securities exchange, nor is it regularly traded in a market maintained by a national or affiliated securities association.

3. Defendant, LAUREN ZUCCHERO (hereinafter “LAUREN”), is a citizen of the State of Illinois. LAUREN is the sole director of MR BEEF and the Administrator of the ESTATE OF JOSEPH ZUCCHERO, deceased pending in the probate division of the Circuit Court of Cook County as case number 2023 P 01722 (hereinafter the “ESTATE”). (Joseph Zucchero hereinafter referred to as “JOSEPH”).

4. CHRISTOPHER ZUCCHERO (hereinafter “CHRISTOPHER”) is a citizen of the State of Illinois.

5. CAMILLE ZUCCHERO (hereinafter “CAMILLE”) is a citizen of the State of Illinois

6. JJD, INC. (hereinafter “JJD”) is an Illinois corporation incorporated as of February 24, 1995. JJD has no shares listed on a national securities exchange, nor is it regularly traded in a market maintained by a national or affiliated securities association.

7. MR. BEEF, LLC (hereinafter “MR BEEF LLC”) is an Illinois limited liability company organized October 3, 2023 and whose sole member is a revocable trust controlled by CAMILLE ZUCCHERO as settlor.

### **COMMON FACTS**

8. This action is brought by Plaintiff DOMINIC, individually and derivatively on behalf of MR BEEF and JJD to recover damages and to prevent further damages from occurring

which defendants have inflicted upon him as a minority shareholder of MR. BEEF and JJD and to MR BEEF and JJD themselves. As set forth herein, defendants have in the past and continue to unlawfully deprive DOMINIC of his rights as a minority shareholder of MR BEEF and JJD while the remaining defendants have unjustly enriched themselves to the detriment of DOMINIC, MR BEEF, and JJD.

### **Ownership of MR. BEEF**

9. As of the mid 1980's DOMINIC and his brother, JOSEPH, were each 50% owners of the common stock in MR. BEEF.

10. Defendant CHRISTOPHER is now the holder of 50 shares of common stock of MR BEEF equating to 50%. Upon information and belief, JOSEPH gifted his 50 shares in MR BEEF to his son, CHRISTOPHER on or about December 25, 2020.

11. According to tax records presently available, sometime in or prior to 2008, DOMINIC's stock ownership was reduced to 33.33%. It is not clear how or when this purported change in his ownership occurred.

12. According to MR BEEF, DOMINIC is the holder of 33.33 shares of common stock of MR BEEF equating to 33.33%.

13. According to MR BEEF, Defendant LAUREN as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO is the holder of 16.67 shares of common stock of MR BEEF equating to 16.67%.

14. Over the years, DOMINIC had repeatedly requested to inspect the books, records and records of MR BEEF from JOSEPH but to no avail.

15. Over the years, DOMINIC repeatedly requested distributions from the earnings of MR BEEF, but none were ever distributed to him.

16. On or about November 10, 2023 DOMINIC via his attorney made a written request for certain books and records of MR BEEF.

17. On or about November 15, 2023, MR BEEF, via its corporate attorney Michael A. Pedicone, produced certain corporate records but it clear that JOSEPH did not maintain full and accurate books and certain records did not exist rendering any further requests for additional books and records futile as to MR BEEF and JJD.

### **Ownership of JJD**

18. Prior to his death, JOSEPH was a shareholder of JJD along with his brother, DOMINIC.

19. Prior to his death in March 2023, JOSEPH was a shareholder of JJD.

20. Prior to his death in March 2023, JOSEPH was the President of JJD.

21. At all relevant times, Plaintiff DOMINIC was a shareholder of JJD.

22. At all relevant times, DOMINIC and his brother JOSEPH held at least 80% of the shares of JJD.

23. Over the years, DOMINIC had repeatedly requested to inspect the books, records and records of JJD from JOSEPH but to no avail.

24. Over the years, DOMINIC repeatedly requested distributions from the earnings of JJD, but none were ever distributed to him.

25. Prior to his death, in his role as a majority shareholder, director, and officer of JJD, JOSEPH was taking funds daily, weekly, monthly and yearly from JJD for personal uses.

26. At all times relevant prior to his death, JOSEPH used JJD as a personal “piggy bank” to the detriment of JJD and DOMINIC.

27. DOMINIC has not received any distributions, monies, or assets of JJD in over 15

years because JOSEPH was diverting money for his own benefit.

28. JOSEPH/ESTATE has knowingly and willfully taken and used the funds of JJD not for business purposes but for his own personal benefit.

**JJD and its business**

29. JJD is the beneficial owner of Trust No. 10239 under Chicago Title Land Trust Company and Trust Agreement dated March 22, 1999 (hereinafter the “Land Trust”).

30. The Land Trust owns the land upon which MR. BEEF operates its business (the “Property”).

31. As of February 27, 2018, JOSEPH and DOMINIC held the power of direction for the Land Trust.

32. Since at least 2007, JJD held a lease in one form or another with MR BEEF for the Property under which MR BEEF, as tenant, was to pay monthly rent to JJD, as landlord. (collectively the “Leases”).

33. Upon information and belief, JOSEPH causes the Leases to be executed on behalf of JJD and MR BEEF.

34. Upon information and belief, MR BEEF failed to pay all rent that was due and owing under the Leases and JJD failed to collect all rents due and owing.

35. On February 26, 2018, the Property was subject to a mortgage foreclosure action originally filed in 2012 in the Circuit Court of Cook County, Illinois, Case No. 2012CH04099. (the “Foreclosure Action”). DOMINIC and JOSEPH were party defendants in the Foreclosure Action as they were guarantors on the underlying notes.

36. In connection with the Foreclosure Action, a third-party investor known as 666 North Orleans Investors LLC (“666”) agreed to pay \$3,500,000 to the mortgage holder in exchange

for the lender to dismiss the Foreclosure Action on the Property owned by JJD (the “Foreclosure Settlement”).

37. In addition, the Foreclosure Settlement included an assignment of the mortgage held on the personal residence of JOSEPH and his wife, CAMILLE to 666.

38. In exchange for the payment to the lender to dismiss the Foreclosure Action, DOMINIC and JOSEPH agreed to transfer all interest in the property held in the land trust to 666.

39. The Foreclosure Settlement with the lender and the agreement with 666 benefitted all parties to the Foreclosure Action. JJD benefitted from the dismissal of the Foreclosure Action. MR BEEF benefitted because it allowed for continued operation of the business, as Mr. Beef and 666 agreed to a lease for the continued operation of the business. JOSEPH and DOMINIC benefitted because they each were shareholders of JJD and MR BEEF.

40. JOSEPH and CAMILLE also benefitted personally from the Foreclosure Settlement because the lender assigned the mortgage on their residence to 666 which would allow them to keep their home which was at imminent risk of being sold at foreclosure sale. They received time to arrange their finances in order to pay back the mortgage amount to 666, which in fact occurred in 2019.

41. In connection with the Foreclosure Settlement and agreements with 666, DOMINIC and JOSEPH knowingly, deliberately, and willfully executed an Assignment of Beneficial Interest in the Land Trust to 666.

42. In July 2018, a separate entity known as 666GFY LLC recorded a false and fraudulent mortgage and assignment of beneficial interest in the Land Trust, against the Property in the amount of \$3,500,000.

43. On or about February 1, 2019, 666 filed a Complaint for Declaratory Judgment in

the Circuit Court of Cook County as case number 2019CH01372 (the “666 Lawsuit”). The 666 Lawsuit named as defendants MR BEEF, 666GFYLLC, the Land Trust, JOSEPH and DOMINIC.

44. In or about the summer of 2019, JOSEPH took the position that he did not intend for the Property to be transferred to 666 and that GFY was the rightful mortgage holder despite knowing that GFY never tendered any funds to the original lender or to 666.

45. On or about October 9, 2019, JOSEPH and MR BEEF retained attorney William F. Smith to appear as counsel for MR BEEF as well as JOSEPH and DOMINIC, individually, in the 666 Lawsuit.

46. Beginning in October 9, 2019, MR BEEF and JOSEPH ZUCCHERO caused attorney Smith to file various pleadings and other court documents taking the newly adopted position of JOSEPH that he did not intend for the Property to be transferred to 666, such position being directly adverse to the position that DOMINIC would have taken in the event that he had independent counsel of his own.

47. Prior to approximately February of 2023, attorney Smith never communicated in any way with DOMINIC and DOMINIC was not aware of the claims and defenses that MR BEEF, JOSEPH, and attorney Smith were asserting on his behalf.

48. MR BEEF and JOSEPH continued to perpetuate and prosecute the false position through years of costly litigation, all of which was funded out of the accounts of MR BEEF to the detriment of DOMINIC.

#### **Operations of Mr. Beef prior to the death of Joseph Zucchero**

49. From the time that JOSEPH and DOMINIC acquired their interest in MR BEEF, JOSEPH ran the day to day business operations and maintained the books and records for MR. BEEF.

50. Prior to JOSEPH'S death MR BEEF was a popular and profitable restaurant in located at 666 N. Orleans in Chicago.

51. Prior to Mar 1, 2023, JOSEPH was the President, Secretary, and Director of MR. BEEF.

52. Prior to his death, in his role as a majority shareholder, director, and officer of MR BEEF, JOSEPH was taking funds daily, weekly, monthly and yearly from MR BEEF for personal uses.

53. At all times relevant prior to his death, JOSEPH used MR BEEF as a personal "piggy bank" to the detriment of MR BEEF and DOMINIC.

54. DOMINIC has not received any distributions, monies, or assets of MR BEEF in over 15 years because JOSEPH was diverting money for his own benefit.

55. JOSEPH/ESTATE has knowingly and willfully taken and used the funds of MR BEEF not for business purposes but for his own personal benefit.

56. On March 1, 2023, JOSEPH died.

**Actions taken after the death of Joseph Zuccherio**

57. LAUREN ZUCCHERO was appointed as independent administrator of the ESTATE on or about March 13, 2023.

58. On or about June 15, 2023, CHRISTOPHER in his capacity as 50% shareholder, and LAUREN, as Administrator of the ESTATE, utilizing their combined 66.66% of the shares of MR BEEF, appointed LAUREN, individually, as the sole director of MR BEEF.

59. On or about June 15, 2023, CHRISTOPHER and LAUREN, utilizing their combined 66.66% of the shares of MR BEEF, adopted bylaws for MR BEEF.

60. The bylaws purportedly adopted on June 15, 2023 are the first known bylaws ever

adopted by MR BEEF.

61. On or about June 15, 2023, LAUREN in her capacity as the sole director of MR BEEF, then appointed officers of MR BEEF as follows:

President: Lauren Zucchero  
Secretary: Camille Zucchero  
Treasurer: Lauren Zucchero

**Further wasting of MR BEEF assets by the LAUREN and the ESTATE**

62. After JOSEPH's death in March of 2023, his daughter LAUREN became the administrator of the ESTATE.

63. Rather than perform her own investigation into the facts and circumstances giving rise to the 666 Lawsuit, LAUREN blindly continued the litigation to the detriment of MR BEEF and its shareholders, including DOMINIC.

64. In approximately February 2023, DOMINIC learned for the first time that attorney Smith purportedly represented DOMINIC having been hired by MR BEEF and JOSEPH ZUCCHERO on his behalf.

65. On June 29, 2023, the undersigned counsel filed an appearance on behalf of DOMINIC in connection with the 666 Lawsuit.

66. Soon thereafter, on August 16, 2023 DOMINIC entered into a settlement with 666 and was dismissed from the 666 Litigation.

67. On September 13, 2023, DOMINIC sat for an evidence deposition in connection with the 666 Lawsuit wherein his testimony contradicted, in nearly all material respects, the position taken as of that date by MR BEEF, LAUREN, and the ESTATE.

68. On October 3, 2023, CAMILLE ZUCCHERO caused to be organized with the Illinois Secretary of State MR BEEF LLC.

69. On November 17, 2023, CAMILLE ZUCCHERO, as Secretary of MR BEEF caused a Special Meeting of Shareholders to be held for the purpose of authorizing the sale of all the intellectual property, including but not limited to any and all service marks, trademarks, and recipes of MR BEEF to MR BEEF LLC, which was owned outright by a trust created by and for the benefit of CAMILLE ZUCCHERO for less than fair market value.

70. This transfer of intellectual property effectively gutted MR BEEF leaving it with significantly diminished value.

71. Also on November 17, 2023 the Special Meeting of Shareholders called for the consideration of authorizing an Amendment to the Articles of Incorporation increasing the number of authorized shares of common stock of MR BEEF from 100 to 100,000.

72. This action to increase the number of authorized shares of MR BEEF by a factor of ten severely diluted the interest of DOMINIC.

73. At the November 17, 2023 Special Meeting of Shareholders, CHRISTOPHER and LAUREN, in collusion with one another and CAMILLE and in retaliation for the recent testimony given by DOMINIC in the 666 Lawsuit, voted in the affirmative representing 66.67% of the shares of MR BEEF.

74. As of November 17, 2023, DOMINIC's shares of MR BEEF had been rendered effectively worthless by the self-dealing and vindictive actions of CAMILLE, LAUREN, and CHRISTOPHER.

**COUNT I**  
**ACCOUNTING vs. Mr Beef on Orleans, Inc.**

75. Plaintiff restates and realleges paragraphs 1-74 above as paragraph 75 of this Count I.

76. As set forth above, the Director(s) of MR BEEF, or those otherwise in control of

MR BEEF have acted, are acting, or will act in a manner that is illegal, oppressive, or fraudulent with respect to Plaintiff DOMINIC as the petitioning minority shareholder.

77. As set forth above, the assets of MR BEEF are being misapplied or wasted.

78. Pursuant to 805 ILCS 5/12.56(b)(5), the Court may order an accounting with respect to any matter in dispute.

79. Alternatively, Pursuant to 805 ILCS 5/12.56(b)(6) the Court may appoint a custodian to manage the business and affairs of MR BEEF to serve for the term and under the conditions prescribed by the court.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually in his capacity as a minority shareholder of MR BEEF, and derivatively on behalf of MR BEEF, requests that this Court:

- a. Order an accounting of the books and records of MR BEEF to ascertain the amount, if any, of funds illegally diverted from MR BEEF for the personal use of JOSEPH;
- b. Order an accounting of the books and records of MR BEEF to ascertain the amount, if any, of distributions to shareholders for the time that DOMINIC has been a shareholder
- c. Appoint a custodian to manage the business affairs of MR BEEF to serve for the term and under the conditions prescribed by the court;
- d. Award monetary damages to compensate DOMINIC for any monies owed to him (in distributions or otherwise) by MR BEEF;
- e. Award attorneys fees to Plaintiff
- f. Any other relief this Court deems just and appropriate.

**COUNT II**  
**ACCOUNTING vs. JJD, Inc.**

80. Plaintiff restates and realleges paragraphs 1-79 above as paragraph 80 of this Count II.

81. As set forth above, the Shareholder, Director(s), and officers of JJD, or those otherwise in control of JJD have acted, are acting, or will act in a manner that is illegal, oppressive, or fraudulent with respect to Plaintiff DOMINIC as the petitioning minority shareholder.

82. As set forth above, the assets of JJD are being misapplied or wasted.

83. Pursuant to 805 ILCS 5/12.56(b)(5), the Court may order an accounting with respect to any matter in dispute.

84. Alternatively, Pursuant to 805 ILCS 5/12.56(b)(6) the Court may appoint a custodian to manage the business and affairs of JJD to serve for the term and under the conditions prescribed by the court.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually in his capacity as a minority shareholder of JJD, and derivatively on behalf of JJD, requests that this Court:

- a. Order an accounting of the books and records of JJD to ascertain the amount, if any, of funds illegally diverted from JJD for the personal use of JOSEPH;
- b. Order an accounting of the books and records of JJD to ascertain the amount, if any, of distributions to shareholders for the time that DOMINIC has been a shareholder
- c. Appoint a custodiam to manage the business affairs of JJD to serve for the term and under the conditions prescribed by the court;
- d. Award monetary damages to compensate DOMINIC for any monies owed to him (in distributions or otherwise) by JJD;

- e. Award attorneys fees to Plaintiff
- f. Any other relief this Court deems just and appropriate.

### COUNT III

#### **BREACH OF FIDUCIARY DUTY vs LAUREN ZUCCHERO, individually and as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO, deceased**

85. Plaintiff restates and realleges paragraphs 1-84 above as paragraph 85 of this Count III.

86. At all times relevant prior to his death, JOSEPH, in his capacity as a majority shareholder, officer, and director of MR BEEF and JJD owed certain fiduciary duties of honesty, candor, loyalty, care, and fair dealing with respect to MR BEEF and minority shareholders like DOMINIC.

87. As set forth herein JOSEPH breached those fiduciary duties when he misappropriated monies of MR BEEF and JJD for his own personal benefit to the detriment of MR BEEF, DOMINIC and JJD Inc.

88. Following JOSEPH'S death, LAUREN, as the administrator of the ESTATE and a 16.67% shareholder of MR BEEF, owed fiduciary duties to DOMINIC and MR BEEF.

89. In her individual capacity, LAUREN owed fiduciary duties to MR BEEF and DOMINIC in her role as an officer of MR BEEF.

90. Following JOSEPH'S death, LAUREN, as the administrator of the ESTATE and a majority shareholder of JJD, owed fiduciary duties to DOMINIC and JJD.

91. Following JOSEPH'S death, LAUREN continued and allowed for the same pattern of wasting corporate assets of MR BEEF and JJD as set forth above.

92. As a result of the breach of fiduciary duties by JOSEPH and LAUREN; DOMINIC, MR BEEF and JJD have suffered damages.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF and JJD requests that this court enter judgment in his favor and against LAUREN ZUCCHERO, individually and as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO, deceased, in an amount to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

**COUNT IV**  
**BREACH OF FIDUCIARY DUTY vs CHRISTOPHER ZUCCHERO**

93. Plaintiff restates and realleges paragraphs 1-92 above as paragraph 93 of this Count IV.

94. CHRISTOPHER is a shareholder of MR BEEF.

95. As a shareholder of MR BEEF, CHRISTOPHER owes certain fiduciary duties of honesty, candor, loyalty, care, and fair dealing with respect to MR BEEF and minority shareholders like DOMINIC.

96. As set forth herein CHRISTOPHER breached those fiduciary duties when he colluded with LAUREN and CAMILLE to transfer all of the intellectual property of MR BEEF to MR BEEF LLC which was owned by CAMILLE for less than fair consideration to the detriment of MR BEEF and DOMINIC.

97. As set forth herein CHRISTOPHER breached those fiduciary duties when he colluded with LAUREN and CAMILLE to amend the Articles of Incorporation of MR BEEF to increase the number of issued shares tenfold, without any legitimate business purpose for doing so, and thereby diluting and rendering DOMINIC's shares in MR BEEF virtually worthless.

98. As a result of the breach of fiduciary duties by CHRISTOPHER, DOMINIC and MR BEEF have suffered damages

99. Defendant Christopher has used the money and assets of Mr. Beef for his personal

use and benefit.

100. Defendant Christopher has failed to protect the assets and monies of Mr. Beef from being misapplied, converted, embezzled and wasted.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF, requests that this court enter judgment in his favor and against CHRISTOPHER ZUCCHERO, in an amount to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

**COUNT V**  
**BREACH OF FIDUCIARY DUTY vs CAMILLE ZUCCHERO**

101. Plaintiff restates and realleges paragraphs 1-100 above as paragraph 101 of this Count V.

102. CAMILLE is an officer of MR BEEF.

103. As an officer of MR BEEF, CAMILLE owes certain fiduciary duties of honesty, candor, loyalty, care, and fair dealing with respect to MR BEEF and its shareholders like DOMINIC.

104. As set forth herein CAMILLE breached those fiduciary duties when he colluded with LAUREN and CHRISTOPHER to transfer all of the intellectual property of MR BEEF to MR BEEF LLC which was owned by CAMILLE for less than fair consideration to the detriment of MR BEEF and its shareholders, like DOMINIC.

105. Defendant Camille has been self dealing with the assets and monies of Mr. Beef and her personal company to the detriment of Plaintiffs Mr Beef and Dominic Zucchero.

106. Defendant Camille has been allowing the misappropriation, misallocation, embezzlement, concealment and conversion of monies and assets of Mr. Beef by herself and the other Defendants.

107. Defendant Camille has failed to protect the monies and assets of Mr. Beef from waste.

108. As a result of the breach of fiduciary duties by CAMILLE; DOMINIC and MR BEEF have suffered damages.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF, requests that this court enter judgment in his favor and against CAMILLE ZUCCHERO, in an amount to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

#### COUNT VI

**UNJUST ENRICHMENT v. Christopher Zuccherio, Camille Zuccherio, MR Beef LLC, and Lauren Zuccherio, individually and as the administrator of the Estate of Joseph Z Zuccherio**

109. Plaintiff restates and realleges paragraphs 1-108 above as paragraph 109 of this Count VI.

110. Defendants CHRISTOPHER, CAMILLE, MR BEEF LLC and LAUREN have been unjustly enriched in that they diverted the assets of MR BEEF for their own benefit which they were not entitled to, and which they did not pay for, to the exclusion of MR BEEF and DOMINIC'S benefit.

111. Under the circumstances set forth herein, it would be unjust for each of them to retain such benefits.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF, requests that this court enter judgment in his favor and against CHRISTOPHER ZUCCHERO, CAMILLE ZUCCHERO, MR BEEF LLC, and LAUREN ZUCCHERO, individually and as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO in an amount

to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

### COUNT VII

**MINORTY SHAREHOLDER OPPRESSION v. Christopher Zuccherò, Camille Zuccherò, and Lauren Zuccherò as the Administrator of the Estate of Joseph Zuccherò, deceased**

112. Plaintiff restates and realleges paragraphs 1-111 above as paragraph 112 of this Count VII.

113. This count is brought pursuant to 805 ILCS 5/12.56

114. CHRISTOPHER, CAMILLE, and LAUREN, individually as administrator of the ESTATE, control(ed) MR BEEF during the relevant time period and have acted, are acting, and, unless stopped, will continue to act in a matter that is illegal, oppressive or fraudulent and which misapplies or wastes the assets of MR BEEF, all to the detriment of Plaintiff DOMINIC's 33.33% interest in MR BEEF.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, in his individual capacity requests that this court enter judgment in his favor and against CHRISTOPHER ZUCCHERO, CAMILLE ZUCCHERO, and LAUREN ZUCCHERO, individually and as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO in an amount to be determined at trial, or alternatively appoint a custodian to oversee the operations of MR BEEF, plus attorneys fees and costs, plus any further relief this court deems just and proper.

### COUNT VIII

**CONVERSION v. LAUREN ZUCCHERO, as the Administrator of the Estate of JOSEPH Z ZUCCHERO**

115. Plaintiff restates and realleges paragraphs 1-114 above as paragraph 115 of this

Count VIII.

116. As set forth above, DOMINIC has repeatedly requested that JOSEPH provide books and records of MR BEEF and JJD to him to no avail.

117. As set forth above, DOMINIC has repeatedly requested of JOSEPH that distributions be made from MR BEEF and JJD, to no avail.

118. At all times relevant, DOMINIC, as a shareholder of each of MR BEEF and JJD, had a right to receive periodic distributions from MR BEEF and/or JJD.

119. DOMINIC has not received any distributions of monies or assets of Mr. Beef in over ten fifteen years.

120. All the while, JOSEPH was taking funds, daily, weekly, monthly and yearly from MR BEEF and JJD for personal uses and using MR BEEF and JJD as his personal “piggy bank.”

121. JOSEPH and the ESTATE have retained and converted funds that belong to MR BEEF and or JJD and taken funds for personal uses and has not distributed any funds to minority shareholders, like DOMINIC.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF and JJD requests that this court enter judgment in his favor and against LAUREN ZUCCHERO, as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO in an amount to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

**COUNT IX**

**CIVIL CONSPIRACY v. CHRISTOPHER ZUCCHERO, CAMILLE ZUCCHERO, and LAUREN ZUCCHERO, individually and as the Administrator of the Estate of JOSEPH Z ZUCCHERO**

122. Plaintiff restates and realleges paragraphs 1-121 above as paragraph 122 of this

Count IX.

123. CHRISTOPHER, CAMILLE, and LAUREN, individually as an officer of MR BEEF and as the Administrator of the ESTATE, colluded and conspired with one another to retaliate against DOMINIC following his settlement and testimony given in connection with the 666 Lawsuit.

124. In such retaliation, and in an effort to completely shut DOMINIC out of MR BEEF, CHRISTOPHER, LAUREN, and CAMILLE colluded, conspired, and agreed that they would render MR BEEF worthless to DOMINIC.

125. To accomplish this goal, they agreed that CAMILLE would organize MR BEEF LLC and that essentially all intellectual property would be transferred to MR BEEF LLC.

126. In addition, to further minimize any impact that DOMINIC could ever have on MR BEEF again, they agreed to file Amended Articles of Incorporation increasing by tenfold the number of shares of MR. BEEF thereby completely diluting DOMINIC's shares.

127. In furtherance of this plan, CAMILLE caused MR BEEF LLC to be organized while at the same time she was an officer of MR BEEF.

128. At a Special Meeting of Shareholders in November 2023, a resolution was presented to transfer all valuable intellectual property to MR BEEF LLC and to increase by tenfold the number of shares of MR BEEF

129. At this meeting, CHRISTOPHER and LAUREN, in her capacity as shareholder via her role as Administrator of the ESTATE, voted in the affirmative representing 66.67% of the shares of MR BEEF.

130. In so acting, CHRISTOPHER, LAUREN, and CAMILLE each breached their respective fiduciary duties owed to MR BEEF and to DOMINIC as set forth above.

WHEREFORE, Plaintiff DOMINIC ZUCCHERO, individually and derivatively on behalf of MR BEEF requests that this court enter judgment in his favor and against CHRISTOPHER ZUCCHERO, CAMILLE ZUCCHERO, and LAUREN ZUCCHERO, individually and as the Administrator of the ESTATE OF JOSEPH Z ZUCCHERO in an amount to be determined at trial, plus attorneys fees and costs, plus any further relief this court deems just and proper.

Respectfully submitted,

**DOMINIC ZUCCHERO**

By: *Craig E. Donnelly*

His attorney

Craig E. Donnelly  
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

DOMINIC ZUCCHERO, individually and derivatively )  
on behalf of MR BEEF ON ORLEANS, INC. an Illinois )  
corporation and JJD, INC., an Illinois corporation )

Plaintiff, )

v. )

MR BEEF ON ORLEANS, INC. and Illinois corporation; )  
LAUREN ZUCCHERO, individually, and as )  
administrator of the ESTATE OF JOSEPH Z ZUCCHERO, )  
deceased; CHRISTOPER ZUCCHERO, individually; )  
CAMILLE ZUCCHERO, individually; JJD, Inc., an )  
Illinois corporation; and MR BEEF LLC, an Illinois )  
limited liability company, )

Defendants. )

No:

**AFFIDAVIT**

The undersigned, under oath, and pursuant to 735 ILCS 5/1-109, state that I am an attorney in charge of this case and that the total monetary damages sought in this cause of action exceeds **Fifty Thousand Dollars (\$50,000.00)**.

/s/ Craig E. Donnelly

One of the Attorneys for Plaintiff

Craig E. Donnelly  
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