## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS FIRST MUNICIPAL DISTRICT

BRETT CORRIGAN,	)	
Plaintiff,	)	
VS.	)	Case No.:
BAILEY FOR ILLINOIS, DARREN BAILEY, AND CINDY BAILEY,	)	
Defendants.	)	

### **COMPLAINT**

COMES NOW the Plaintiff, Brett Corrigan, by and through the undersigned counsel, and as his Complaint against Defendants, Bailey for Illinois, Senator Darren Bailey, and Cindy Bailey, states as follows:

### NATURE OF THE CLAIMS

- 1. This is a Complaint for Sexual Harassment, Defamation *Per Se*, False Imprisonment, and Intentional Infliction of Emotional Distress brought by Brett Corrigan, a former staff member of the Bailey for Illinois campaign who worked for and resided with Darren and Cindy Bailey for the better part of the past two years.
- 2. This Complaint also seeks a declaration of unenforceability regarding a non-disclosure agreement that the Bailey for Illinois campaign forced Brett Corrigan, a minor, to enter into, with knowledge that he was a minor at the time of signing.

### PARTIES, JURISDICTION AND VENUE

3. Plaintiff, Brett Corrigan, is an individual with a residence at 13940 Bunratty Drive, Orland Park, 60467, in Cook County, Illinois.

- 4. Upon information and belief, Defendant, Bailey for Illinois campaign ("Campaign"), is a political committee formed under the laws of the State of Illinois, with a principal place of business at 154 S. Church, Louisville, Illinois 62858.
- 5. Upon information and belief, Defendants, Darren and Cindy Bailey (collectively, "Bailey Defendants"), are individuals residing at 6121 Xenia Iola Road, Xenia, Illinois 62454. Upon information and belief, the Bailey Defendants are married to one another.
- 6. Jurisdiction is proper pursuant to 735 ILCS § 5/2-209 the tortious acts complained of herein took place within the State of Illinois and all Defendants were resident in the State of Illinois at the time when the tortious acts took place.
- 7. Venue is proper pursuant to 735 ILCS § 5/2-101 because at least some of the acts of which the causes of action arose took place in this County.

## FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

- 8. On information and belief, the Bailey for Illinois campaign is chaired by Senator Darren Bailey and led by Treasurer Jose Durbin, who also serves as the Campaign Manager. Senator Bailey's wife, Cindy Bailey, serves as a Board Member of the Campaign, and Jennifer Crowder serves as her personal assistant. Yanzi Mendez is employed by the Campaign as its Diversity and Inclusion Director. Joe DeBose is employed by the Campaign as the Communications Director. Joe Alexander is employed by the Campaign as a Director and, on information and belief, was considered by the Campaign to supervise Corrigan.
- 9. Corrigan grew up in suburban Hoffman Estates. His father passed away when he was 2-1/2 years of age. Corrigan's mother suffers from mental health issues, which created an abusive home environment. Corrigan's twin sister suffers from gender dysphoria, and his brother suffers from drug addiction.

- 10. Corrigan volunteered for political organizations to get out of his home and to provide a constructive distraction from the realities of his home environment.
- 11. On March 26, 2021, Corrigan first spoke with the Bailey Defendants at a "Freedom Friday" political event in McHenry County. He was 16 at the time. Two days later, Darren Bailey asked Corrigan to join the Campaign.
- 12. Corrigan primarily served as an assistant to the Bailey Defendants and as a personal driver. Corrigan routinely drove one of the Bailey Defendants' sport utility vehicles, which bear State Senator license plates. The Bailey Defendants often encouraged Corrigan to drive in excess of the speed limit when ferrying them across Illinois because, should they be pulled over for speeding, the State Senator license plates would preclude any arrest or citation. Driving at or near 100 mph was typical in the Bailey Defendants' vehicles when traveling between Chicago and Xenia, Illinois.
- 13. Soon after joining the Campaign, the Bailey Defendants invited Corrigan to move into their home in Xenia, Illinois.
- 14. The Bailey Defendants told Corrigan that there were no Christians in Chicago.

  This was a sentiment they have repeated to Corrigan on numerous occasions, long before their public statements that Chicago is a "Hellhole."
- 15. The Bailey Defendants told Corrigan that he should move to their house in Xenia, Clay County, Illinois, and enroll in their private Christian school, Full Armor Academy.
- 16. Corrigan accepted the invitation and moved into the Bailey house on June 5, 2021. Corrigan enrolled in Full Armor Academy beginning in August, 2021.
- 17. Cindy Bailey encouraged Corrigan to bring all of his possessions to their house, where she represented that they would be safe. Corrigan complied, and over the course of

the next few weeks brought 5-1/2 carloads of possessions, many of which were items of a sentimental nature.

- 18. The Bailey Defendants provided Corrigan with a bedroom. However, he was not provided kitchen or any other privileges in the house. Cindy Bailey told Corrigan that they value their privacy and that Corrigan was not to go anywhere in the house except directly to his bedroom.
- 19. The Bailey Defendants did not provide Corrigan with food. He scrounged food from Campaign events and bought food on the road when he could. On very rare occasions, Corrigan was permitted to have dinner with Cindy and Darren Bailey.
- 20. Corrigan served as a personal assistant to the Bailey Defendants. He worked six or seven days a week for them, oftentimes very long 18-hour days.
- 21. Corrigan often was expected to rise early and get morning coffee for Cindy Bailey, and often he would be the last to go to bed, preparing for the next day's Campaign activities.
- 22. On one occasion, Corrigan left the Bailey house before sunrise to get Cindy her morning coffee. While driving to get the coffee, Corrigan received a text message from Cindy with a photo of his unmade bed and instructing him to never again leave the house with his bed unmade.
- 23. Cindy Bailey told Corrigan that he was on-duty for the Campaign during the day and that he would have to do his schoolwork "on his own time," which often was late at night or on days with no Campaign events.
- 24. For much of the past two years, Corrigan traveled with the Bailey Defendants and stayed with them when on the road at hotels or at their apartment in North Aurora, Illinois.

- 25. On one occasion, the Bailey Defendants stayed in a hotel suite, in which the Bailey Defendants slept in the bedroom and Corrigan slept in the adjoining living room. Cindy Bailey instructed Corrigan to use the restroom before they went to sleep, and then Corrigan was not permitted to use the restroom again until the next morning.
- 26. On many occasions, while Corrigan would reside with them, the Bailey Defendants would engage in sexual intercourse while Corrigan was in an adjoining room.
- 27. Senator Bailey often would tell Corrigan to "wear your headphones tonight, [Cindy Bailey] is in the mood."
- 28. On some occasions, Corrigan witnessed the Baileys argue with each other. Senator Bailey often would comment to Corrigan and others on the Campaign who witnessed the arguments that "the make-up sex is going to be great!"
- 29. On one occasion, Corrigan and others on the Campaign team witnessed a particularly contentious argument between the Baileys, after which Senator Bailey assured the staffers that they're having the "best sex in 40 years."
- 30. The Bailey Defendants often spoke with Corrigan about their sexual activities. In one instance, Darren Bailey stated that when he came on top of Cindy, she would conceive boys, and when she came on top of him, she would conceive girls.
- 31. On some occasions, Corrigan would overhear raucous noises in the middle of the night as the Bailey Defendants engaged in sexual intercourse. It was not uncommon for Cindy Bailey to cry out "Governor! Governor!" as she climaxed.
- 32. On May 26, 2022, the Bailey Defendants gave Corrigan a non-disclosure agreement to sign. Corrigan expressed dissatisfaction with having to sign the agreement, because

he had been employed for over a year without any issue. The Bailey Defendants gave him an ultimatum to sign the contract, or be fired.

- 33. Corrigan, a minor, signed the contract under duress. A true and correct copy of the non-disclosure agreement is attached hereto as **Exhibit A**.
- 34. At the time when the Bailey Defendants insisted that Corrigan sign the contract, Corrigan was a minor and the Bailey Defendants were aware that Corrigan was a minor.
- 35. Beginning about November 2021, Cindy Bailey began discussing marriage with Corrigan. She believed he needed to marry immediately, and that upon marriage, he could enjoy a robust sex life like the Bailey Defendants.
- 36. Cindy Bailey introduced Corrigan to a similarly aged woman that Cindy knew through church contacts and Cindy often told Corrigan that they should get married.
- 37. Corrigan rebuffed the marriage arrangements, telling Cindy that he was not ready to be married.
- 38. Cindy Bailey believed that Corrigan's rebuffing was rude and disrespectful, and Cindy often insisted that Corrigan needed to attend counseling.
- 39. Cindy Bailey attempted to arrange for Corrigan to attend counseling with a woman from Cindy's church. Corrigan declined the repeated invitations to attend counseling. The Bailey Defendants then offered to pay for counseling sessions, so Corrigan agreed to attend some sessions. After two sessions, the Bailey Defendants stated that they would pay for half of the next lesson, but then Corrigan would have to pay for the sessions that they were obligating him to attend, stating to Corrigan that he would take the counseling more seriously if he was paying for it.

- 40. The Bailey Defendants' preferred counselor insisted on using electroshock therapy, which Corrigan declined. From that point forward, Corrigan attended occasional sessions with the counselor by phone, when Cindy Bailey insisted that Corrigan attend another session.
- 41. In early September, 2022, Corrigan was driving Cindy Bailey and Jennifer Crowder to an event. The individuals argued over the route to be taken, and Corrigan interjected that Cindy Bailey's proposed plan was "stupid." While Cindy Bailey did not take particular offense to the comment at that time, Jennifer Crowder was shocked and stated that Corrigan "needed a spanking."
- 42. The notion of "spanking" frequently came up on the Campaign. Often Joe Alexander spoke of people needing "spankings," and those instances were made to or in the presence of Corrigan in the context of sexual acts, as in, certain campaign volunteers who Alexander was pursuing or sleeping with needed to be spanked.
- 43. On Saturday, September 10, 2022, Corrigan drove Cindy Bailey to Campaign events in Peoria. After the events, Corrigan drove Cindy Bailey back to the Hancock Center in Downtown Chicago, where the Bailey Defendants have been residing.
- 44. Corrigan then drove Joe Alexander to dinner at the Trump Hotel Chicago. For months, Joe Alexander had been telling Corrigan how much he wanted to have dinner at the Trump Hotel Chicago.
- 45. But as it turned out, dinner at the Trump Hotel Chicago would have to wait. Just when Corrigan and Alexander had arrived at the hotel, on information and belief, Alexander received a salacious text message from a female volunteer instructing Alexander to "come over" for sex.

- 46. Joe Alexander told Corrigan, "I need to get laid, it's been a long week."
- 47. Joe Alexander asked Corrigan to drive him to the female volunteer's house so that he could have sexual intercourse with her. Seeing no ability to decline the instruction from a senior staff member, Corrigan agreed to drive Joe Alexander to the female volunteer's home, where Corrigan dropped Alexander off for the night.
- 48. On Sunday, September 11, 2022, Corrigan and Joe Alexander attended a Campaign event at a church in Chicago. It was raining very, very hard, and the National Weather Service had issued flash flood warnings for the area.
- 49. In the pouring rain, Yanzi Mendez directed Corrigan to go out to her vehicle to retrieve her business cards. Having just dried off from the rain, Corrigan declined. Moments later, Joe Alexander approached Corrigan and instructed him to go out in the pouring rain and retrieve Ms. Mendez's business cards. Corrigan again declined.
- 50. Then, Senator Bailey abruptly approached Corrigan, slammed down the car keys on a table next to Corrigan, and instructed Corrigan, "You go out there now and get her business cards. You never make a woman go out in the rain."
- 51. Corrigan then went outside in the pouring rain and retrieved the business cards.
- 52. Joe Alexander then drove the Baileys to a parade immediately following the church service on September 11, 2022, while Corrigan followed behind in a separate Campaign vehicle. Once at the parade, Joe Alexander relayed to Corrigan details of his sexual conquest from the night before. Alexander stated to Corrigan, "I loved exploring her body."
  - 53. Joe Alexander routinely shared details of his sexual conquests with Corrigan.

- 54. Alexander also frequently asked Corrigan if he wanted his "ass ate out," referring to the sexual act of "rimming," which Corrigan was not clear if it was an offer by Alexander to conduct the "rimming" on himself, a minor, or to facilitate a staffer or volunteer under Alexander's watch to do so.
- 55. Additionally, Alexander routinely shared with Corrigan activities that made him sexually excited, such as when a sexual partner inserts his or her fingers into Alexander's anus. Alexander often encouraged Corrigan to "try it out" on himself, and made repeated offers to arrange for volunteers or staffers under his watch penetrate Corrigan's anus with their fingers.
- 56. On information and belief, Joe Alexander was issued a phone from the Campaign to be used for Campaign business.
- 57. Joe Alexander often and routinely used the phone he was issued from the Campaign to text Corrigan messages of a sexual nature, including tweets about sexual content.
- 58. Many of the tweets that Joe Alexander would text to Corrigan came from adult-content Twitter accounts including "Rivelino" (Twitter handle: @alpharivelino) and "FortWorthPlayboy" (Twitter handle: @FWPlayboy), which provide tips on improving sexual prowess, among other adult-appropriate content.
- 59. As one example, on September 5, 2022, Joe Alexander texted, using his Campaign phone, to Corrigan an instant message with content originating from Rivelino, stating: "Don't lean in, pull her into you. Remember to facefuck her first. Be the man she can't control."
- 60. As another example, on September 10, 2022, Joe Alexander texted, using his Campaign phone, to Corrigan an instant message with content also originating from Rivelino, stating: "Her value plummets with age, as her appearance fades, with every cock she rides, every

pump and dump she experiences. Your value increases with every fuck, experience, and dollar earned."

- 61. Joe Alexander also periodically asked Corrigan to double date with him in various mother-daughter arrangements. For example, on August 31, 2022, Joe Alexander texted, using his Campaign phone, to Corrigan the following instant message: "One of my sons has a cross country meet in Romeoville but then was seeing if you want to join a hot mom/daughter duo for dinner. Daughter did Rabine social media."
- 62. Joe Alexander often and routinely watched pornographic video on his Campaign-issued phone, and when Alexander would do so in front of Corrigan, Alexander would invite Corrigan to watch with him. Alexander often watched very graphic pornographic videos, and some of the content that he would show Corrigan involved group sex with multiple men penetrating a woman at the same time.
- 63. On one occasion, Joe Alexander played a graphic and lewd pornographic video on his Campaign-issued phone, with the volume on speakerphone, while Alexander and Corrigan were having dinner at Smokey Bones Bar & Fire Grill, a prominent barbeque restaurant in Springfield, Illinois. The restaurant was near full capacity at the time and in full view of onlooking patrons at neighboring tables. At the conclusion of dinner, Alexander and Corrigan exited the restaurant and got into the Campaign vehicle parked just outside the door, which bears the Campaign name on both sides and the rear window.
- 64. On information and belief, Joe Alexander is about 47 years of age and is aware that Corrigan is and at all times was a minor during Corrigan's employment with the Campaign.

- 65. On information and belief, Senator Bailey has been told about Joe Alexander's sexual perversions, both by other officers of the Campaign, by Corrigan, and by certain third parties.
- 66. On information and belief, Senator Bailey has been told by others on the Campaign and/or by trusted third parties that Joe Alexander has had sexual intercourse with Campaign volunteers and is actively pursuing certain Campaign volunteers for the purpose of having sexual intercourse.
- 67. On information and belief, one third party close to the Campaign told Senator Bailey that Joe Alexander needs to be fired immediately.
  - 68. Sexual harassment within the Campaign is not unique to Joe Alexander.
- 69. The Campaign previously employed a staff member named Josh Naponiello, who worked directly with Corrigan.
- 70. Josh Naponiello often spoke to Corrigan about his sexual desires, in much the same way as Joe Alexander. Naponiello referred to Corrigan as his "bitch."
- 71. Naponiello also regularly used the N-word, and would sometimes use the N-word to address Corrigan.
- 72. During Campaign trips, Jose Durbin sometimes would have Corrigan share a hotel room with Naponiello, where much of these inappropriate comments and sexual harassment would occur.
- 73. On March 19, 2022, Corrigan sent Durbin an email message requesting not to be paired with Naponiello ever again, and detailing many of the inappropriate comments and sexual harassment.

74. As another example of rampant sexual harassment that took place within the Campaign, on or about August 18, 2022, the night of the Illinois State Fair Republican Day Dinner, Jose Durbin, Joe DeBose, and Corrigan shared adjoining rooms in a hotel. Jose Durbin placed Corrigan in the same room with Joe DeBose. Following the Illinois State Fair Republican Day Dinner, Durbin and DeBose went out drinking and returned to the room heavily intoxicated. DeBose protested to Durbin upon finding Corrigan in his room, stating to Durbin that he didn't want Corrigan in his room because he wanted to "jerk off" (masturbate) in bed that night.

75. At the conclusion of the Campaign events on September 11, 2022, Jose Durbin approached Corrigan and gave him this instruction: "You're going to skip the next event and instead go to [the Bailey's apartment in] North Aurora. You're going to pack up your things, and then you are going to go to the Bailey house for a week or longer, because you are grounded."

76. Thereafter, Corrigan drove to the Bailey Defendants' apartment in North Aurora, Illinois. Jose Durbin met Corrigan at the apartment and collected all keys from Corrigan. Thereafter, Durbin drove Corrigan to Jose Durbin's father-in-law for the night.

77. Corrigan declined to go to Jose Durbin's father-in-law's house, instead stating that they should stay in North Aurora for the night.

78. Jose Durbin then delivered an ultimatum to Corrigan: Either go to his father-in-law's house, or you are fired from the Campaign.

79. Corrigan attempted to quit from the Campaign, but Jose Durbin refused to accept his resignation.

80. Thereafter, Durbin took Corrigan to Durbin's father-in-law's house, where Corrigan spent the evening of September 11, 2022.

- 81. On Monday, September 12, 2022, Jose Durbin drove Corrigan to the Bailey house in Xenia, Clay County, Illinois.
- 82. For about the next four days, Corrigan was confined at the Bailey house in Xenia, where he was under specific instructions by the Bailey Defendants to stay, only having permission to travel from the Bailey house to the nearby Campaign office to carry out specific tasks.
- 83. In fact, Corrigan had an approved paid time off for a day that week to visit his grandfather. But because Corrigan was quarantined at the Bailey house, Corrigan had to cancel his plans with his grandfather.
- 84. On information and belief, the Bailey Defendants utilize an extreme form of "tough love" to discipline what they refer to as "unruly children:" they kick them out of the house.
- 85. On Thursday, September 15, 2022, Cindy Bailey called Corrigan inquiring about his mental health and again insisting that Corrigan needs to attend her church's counselor.
- 86. Corrigan informed Cindy Bailey that he wanted to leave his confinement at the Bailey house and return to his regular work on the Campaign.
- 87. Cindy Bailey made an ultimatum to Corrigan: Get more counseling from the Bailey's Christian counselor, or be fired.
- 88. Cindy Bailey stated to Corrigan: "Darren and I are sick of this. You need to have a faithful marriage. You're unemployable. If it wasn't for Darren and me, you would be nothing."
- 89. Cindy Bailey further stated to Corrigan: "If it were not for us, you would be just like your siblings."

- 90. Moreover, Cindy Bailey stated to Corrigan that as long as he is a minor, he will listen to the Bailey Defendants and do what they demand, that when he is 18 years of age, he can choose his own destiny.
- 91. While Corrigan resided with the Bailey Defendants, at no time have they been appointed as his legal guardian. Corrigan's 18<sup>th</sup> birthday was October 25, 2022.
- 92. Cindy Bailey ended the call and thereafter Corrigan texted to her: "Please call me when you're ready to listen. Trying to talk, but you don't listen."
- 93. Cindy Bailey then responded to Corrigan's text: "You will not be leaving home until you follow my requests of seeing the counselor. If you will not follow, then you will be done with the Campaign."
- 94. Cindy Bailey then texted to Corrigan: "You better get your head on straight!!!

  Any other employer would fire you on the spot."
- 95. On September 15, 2022, Corrigan declined Cindy Bailey's ultimatum and instead quit the Campaign.
- 96. Upon receiving Corrigan's resignation, Cindy Bailey texted to Corrigan: "Let me know your new address, and I'll send your transcripts. Leave your keys and FOBs on the kitchen counter." Corrigan left his keys and FOBs on the kitchen counter.
- 97. Thereafter, Jose Durbin called to terminate Corrigan, but Corrigan informed Jose that he already had quit the Campaign.
- 98. Jose Durbin then gave Corrigan 1-1/2 hours to get out of the Bailey house, and told Corrigan to remember that he is obligated to follow the non-disclosure agreement.
- 99. Two sons of the Bailey then arrived at the Bailey house to ensure that Corrigan left the house within the 1-1/2-hour timeframe set by Durbin.

- 100. The Bailey sons instructed Corrigan to remove all of his possessions from the Bailey house. Corrigan removed the 5-1/2 carloads of personal possessions from the Bailey house and placed on their driveway.
- 101. Corrigan filled his car with one load of the most essential of his possessions, leaving 4-1/2 carloads of possessions on the driveway.
- 102. Corrigan asked Jose Durbin if he could store his remaining possessions at the Bailey house until he could make arrangements for their safe removal.
- 103. Jose Durbin responded by instructing Corrigan to remove everything from the Bailey house, and the Bailey sons gave Corrigan trash bags for his remaining possessions.
- 104. Corrigan placed 4-1/2 carloads of his possessions into trash bags, which he then placed into a dumpster at the Bailey house. Most of the possessions that Corrigan had to throw out were items of a sentimental nature.
- 105. One of the items that Corrigan had to throw out was a standing lamp given to Corrigan by close friends, which was of great sentimental value to Corrigan.
- 106. Corrigan's car was so full, that he was unable to take summer clothing, knowing that he needed the space for winter clothing.
- 107. Corrigan left the Bailey house around 5 pm on Thursday, September 15, 2022.
- 108. Since the time when Corrigan left the Bailey house, the Bailey Defendants have not attempted to contact Corrigan to inquire about his well-being or to make sure that he has shelter.

- 109. On information and belief, officers and agents of the Campaign have been communicating to current and former staff members of the Campaign and supporters of the Campaign various false and defamatory statements about Corrigan.
- 110. On information and belief, Jose Durbin has communicated to current and former staff members that Mr. Corrigan left "on bad terms."
- 111. On information and belief, Cindy Bailey has communicated to supporters of the Campaign that Corrigan suffers from a "deteriorating mental health."
- 112. On information and belief, Joe Alexander has made similar statements to other Campaign supporters.
- 113. On September 26, 2022, counsel for Corrigan directed a cease-and-desist letter to the Campaign via electronic mail and U.S. Express Mail. The cease-and-desist letter requested written assurances from the Campaign within seven days, or by October 3, 2022, that the Campaign would comply with the cease-and-desist letter. A true and correct copy of Corrigan's cease-and-desist letter is attached hereto as **Exhibit B**.
- 114. On September 30, 2022, counsel for the Campaign provided written assurances that the Campaign would comply with the cease-and-desist letter. A true and correct copy of the Campaign's written assurances is attached hereto as **Exhibit C**.
- 115. On information and belief, despite the Campaign's written assurances to the contrary, officers and agents of the Campaign continue to make false and defamatory statements about Corrigan to third parties.
- 116. As one example, on information and belief, Corrigan received a phone call on October 11, 2022, from one of the largest Bailey Campaign supporters, Ketu Amin. Mr. Amin

informed Corrigan that he had spoken with Senator Bailey that morning who told him that (1) Corrigan left his campaign on bad terms, and that (2) Corrigan could not be trusted.

- 117. Several days prior to October 11, 2022, Corrigan had spoken with Ketu Amin and had secured a funding commitment from Mr. Amin in which Corrigan would have received commission in excess of \$1000.
- 118. As a direct result of Senator Bailey's defamatory statements to Mr. Amin regarding Corrigan, Corrigan lost the opportunity to make a commission in excess of \$1000.
- 119. On information and belief, Senator Bailey's defamatory statements to Mr. Amin have jeopardized any future relationship between Corrigan and Mr. Amin.
- 120. Additionally, on information and belief, Cindy Bailey and/or the Campaign have been using agents of the Campaign, including certain volunteers not on the Campaign payroll, to proliferate false and defamatory statements about Corrigan.
- 121. As one example, on information and belief, Cindy Bailey has instructed Chrissi Bretz, founder of mothers' group Freedom Illinois and, on information and belief, an agent of the Campaign, to proliferate Cindy Bailey's position that Corrigan suffers from "deteriorating mental health" to members of the Freedom Illinois group and to other volunteers and supporters of the Campaign.
- 122. In a spirit of reaching an amicable resolution of these matters, on October 21, 2022, counsel for Corrigan tendered in good faith to the Bailey Defendants and the Campaign a very fair settlement agreement that included a draft complaint. About thirty-six hours later, on October 23, 2022, Daniel Proft communicated to counsel for Corrigan via text message, instructing counsel for Corrigan to "Go ahead. Please file [the complaint]." *See* Exhibit D, which is a true and correct copy of a screenshot of a text message thread sent from

Dan Proft to Scott Kaspar and was the first response received by counsel for Corrigan by anyone on behalf of the Campaign.

- 123. On information and belief, Daniel Proft has contacted, via text message and phone call, other third parties, instructing the third parties to communicate to counsel for Corrigan to file the complaint. In one particular instance, Daniel Proft stated to a third party, "You tell that fucking clown Kaspar to file the complaint."
- On information and belief, Daniel Proft is Chair and Treasurer of People Who Play By The Rules PAC ("the Bailey PAC"), an independent expenditure committee organized under the Illinois law. See Exhibit E, which is a true and correct copy of a printout website of the Illinois Board of Elections. available from the State at: https://www.elections.il.gov/CampaignDisclosure/CommitteeDetail.aspx?ID=meYU8YumQ1Ujl ydtIJRv9w%3d%3d&T=638022974913817776 (last accessed October 25, 2022).
- 125. On information and belief, the Bailey PAC has raised over \$42M in funds for use in support of the Campaign, almost all of which came from Illinois billionaire Richard Uihlein. *See Exhibit F*, which is a true and correct copy of a printout from the website of the Center for Illinois Politics, available at: https://data.centerforilpolitics.org/committee/people-who-play-by-the-rules-pac-37277 (last accessed October 25, 2022).
- 126. On information and belief, the Bailey PAC has devoted the majority of those funds to expenditures in support of the Campaign.
- 127. On information and belief, on October 23, 2022, the Campaign terminated Joe Alexander's employment.
- 128. On information and belief, on October 23, 2022, Daniel Proft contacted a prominent Chicago lawyer seeking representation for the Campaign. On information and belief,

that prominent Chicago lawyer, who is precluded from representing the Campaign because of the significant amount of work that the prominent Chicago lawyer's firm does for Pritzker-family businesses, has been attempting to find the Campaign legal representation in Chicago, but to no avail.

- 129. On October 24, 2022, Robert "Bob" Coble, an attorney in Flora, Illinois, who represents the Bailey Defendants, stated to counsel for Corrigan in a phone call that he does not represent the Campaign, before ending the call by telling counsel for Corrigan to "Fuck off."
- 130. At the time of filing, on information and belief, the Campaign has no legal representation; however, on information and belief, Daniel Proft is serving as the *de facto* representative for the Campaign.
- 131. Corrigan worked for the Bailey Defendants for the better part of two years, during which time he was almost entirely on the clock, with only a handful of days off. Corrigan forewent two years of Homecomings and Proms, forewent much of the events and experiences that typical high school students enjoy during their junior and senior years.
- 132. Corrigan did so at great sacrifice to his education, in detrimental reliance on the Bailey Defendants' assurances that, as founders and owners of a Christian academy, Corrigan would be far better off leaving public education and joining the Full Armor Christian Academy, a school that is not accredited by the Illinois State Board of Education, but rather finds its legality under the exceptions in Illinois law for home schools.
- 133. In sum, the Bailey Defendants preyed on Corrigan's weaknesses and disadvantages to better their own personal lives and their political campaign under the guise of training and educating Corrigan. The Bailey Defendants took a minor child from a broken home, from a single mother, where anywhere would be an improvement. And the Bailey Defendants

transferred Corrigan from one abusive situation to another, one in which they controlled to their advantage and to the degradation to Corrigan and his mental health and well-being.

#### **COUNT I**

#### SEXUAL HARASSMENT 775 ILCS 5/1-101

- 134. Plaintiff repeats and realleges the allegations of Paragraphs 1-133 above and incorporates the same by reference as though fully set forth herein.
- 135. At all times relevant, the Bailey Defendants and Campaign have known that Corrigan, then a minor, was being subjected to indecent and sexually disorderly conduct that constitutes sexual harassment under Illinois law by members of the Campaign, including directors of the Campaign and those in a position of superiority to Corrigan on the Campaign.
- 136. With knowledge of the sexual harassment, the Bailey Defendants and Campaign have nevertheless intentionally failed to take measures reasonably calculated to end or mitigate the sexual harassment.
- 137. As a direct and proximate result of the Bailey Defendants' and the Campaign's failure to take appropriate corrective steps to protect Corrigan and address the sexual harassment, Corrigan has been injured and damaged.

WHEREFORE, Corrigan prays for:

- a) Judgment for compensatory damages in excess of \$75,000.00;
- b) Judgment awarding Corrigan reasonable attorney's fees and costs;
- c) Punitive damages; and
- d) Such other relief as this Court may deem just and proper.

### **COUNT II**

#### **DEFAMATION PER SE**

- 138. Plaintiff repeats and realleges the allegations of Paragraphs 1-133 above and incorporates the same by reference as though fully set forth herein.
- 139. In verbal communications with Campaign employees and agents, with third-party donors and supporters of the Campaign, and with other third parties, Defendants have made and are continuing to make factual statements relating to Corrigan's departure from the Campaign and to his mental health and wellbeing.
- 140. The purported factual statements made by Defendants relating to Corrigan were false at the time they were made and continue to be false.
- 141. Said false statements were transmitted by Defendants to third parties either verbally or in writing with malicious intent to injure Corrigan's character and trade, without justification or excuse, without any reasonable basis in law or fact, and with knowledge of their falsity.
- 142. Defendants' false statements impugn the integrity of Corrigan's character and trade and are the direct, immediate, and proximate causes of irreparable damage to Corrigan's reputation in the community, rendering these false statements defamatory per se such that Corrigan is entitled to damages.

WHEREFORE, Corrigan prays for:

- e) Judgment for compensatory damages in excess of \$75,000.00;
- f) Judgment awarding Corrigan reasonable attorney's fees and costs;
- g) Punitive damages; and
- h) Such other relief as this Court may deem just and proper.

### **COUNT III**

#### FALSE IMPRISONMENT

- 143. Plaintiff repeats and realleges the allegations of Paragraphs 1-133 above and incorporates the same by reference as though fully set forth herein.
- 144. That the wrongful acts and conduct of all Defendants, as set forth and described herein, as directed to Corrigan, a minor, were intended to confine and detain Corrigan, all without sufficient legal authority, and such actions and conduct did confine and detain Corrigan, all without sufficient legal authority, and such actions and conduct did confine and violate the personal liberty of Corrigan.
- 145. That as a direct and proximate cause of the false imprisonment of Corrigan, he has caused to suffer and experience physical and emotional pain, injuries, discomfort, embarrassments, and humiliation, all to his general damages, both past and future, in an amount in excess of seventy-five thousand dollars (\$75,000.00).

WHEREFORE, Corrigan prays for:

- i) Judgment for compensatory damages in excess of \$75,000.00;
- j) Judgment awarding Corrigan reasonable attorney's fees and costs;
- k) Punitive damages; and
- l) Such other relief as this Court may deem just and proper.

### **COUNT IV**

#### INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

146. Plaintiff repeats and realleges the allegations of Paragraphs 1-133 above and incorporates the same by reference as though fully set forth herein.

- 147. That the wrongful acts and conduct of all Defendants, as set forth and described herein, as directed to Corrigan, a minor, were extreme and outrageous and engaged with the intention or with reckless disregard of causing Corrigan emotional distress.
- 148. That as a direct and proximate cause of the wrongful acts and conduct of the Defendants, as set forth and described herein, Corrigan was caused to suffer and experience severe and extreme emotional distress, all to his damages, both past and future, in an amount in excess of seventy-five thousand dollars (\$75,000.00).

WHEREFORE, Corrigan prays for:

- m) Judgment for compensatory damages in excess of \$75,000.00;
- n) Judgment awarding Corrigan reasonable attorney's fees and costs;
- o) Punitive damages; and
- p) Such other relief as this Court may deem just and proper.

#### **COUNT V**

### **DECLARATION JUDGMENT 735 ILCS 5/2-701**

#### UNENFORCEABILITY OF CONTRACT WITH MINOR

- 149. Plaintiff repeats and realleges the allegations of Paragraphs 1-133 above and incorporates the same by reference as though fully set forth herein.
- 150. On about May 26, 2022, the Bailey Defendants forced Corrigan to enter into a non-disclosure agreement with the Campaign.
- 151. A true and correct copy of the non-disclosure agreement is attached hereto as **Exhibit A**.
- 152. The Bailey Defendants told Corrigan he would be fired from the Campaign if he did not sign the non-disclosure agreement.

153. At the time when Corrigan entered into the non-disclosure agreement, he

was a minor.

154. The Bailey Defendants were aware that Corrigan was a minor at the time

when they forced Corrigan to enter into the non-disclosure agreement.

WHEREFORE, pursuant to 735 ILCS 5/2-701, Corrigan seeks a declaration from

this Court that the non-disclosure agreement attached hereto as **Exhibit A** is unenforceable; to

award attorney's fees and costs for seeking this declaration; and for such other and further relief

as this Court may deem just and proper or to which Corrigan may be entitled as a matter of law.

**JURY DEMAND** 

Plaintiff seeks a trial by jury on all issues so triable.

Dated: October 26, 2022 Respectfully submitted,

**BRETT CORRIGAN** 

By: /DRAFT/

An Attorney for Plaintiff

SCOTT R. KASPAR Attorney Code 62376 KASPAR LAW COMPANY, LLC One South Dearborn, Floor 20 Chicago, Illinois 60603 855.527.7271 Scott@KasparLaw.Co

## EXHIBIT A

## DEFENDANTS' NON-DISCLOSURE AGREEMENT DATED MAY 26, 2022



## EXHIBIT B

## CORRIGAN'S CEASE-AND-DESIST LETTER DATED SEPTEMBER 26, 2022



## EXHIBIT C

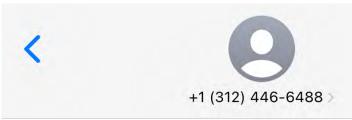
## DEFENDANTS' WRITTEN ASSURANCES DATED SEPTEMBER 30, 2022



## EXHIBIT D

## TEXT MESSAGE EXCHANGE DATED OCTOBER 23, 2022 BETWEEN DAN PROFT AND COUNSEL FOR PLAINTIFF





Text Message Today 12:29 PM

# Scott. Dan Proft. Can you give me a call?

The sender is not in your contact list.

Report Junk



Text Message Today 12:29 PM

Scott. Dan Proft. Can you give me a call?

Hi Dan. What is this concerning?

The rumors I'm hearing about some complaint you're planning on filing against Bailey.

And?

Ok then. Go ahead. Please file it.

Dan, I don't ordinarily talk about legal matters with third parties, and particularly with members of the Press.

It also is my understanding that you are the head of a PAC that is supporting Sen. Bailey's candidacy. The campaign is represented by counsel, and communication on my end has to go through counsel.

## **EXHIBIT E**

## PRINTOUT FROM ILLINOIS STATE BOARD OF ELECTIONS REGARDING PEOPLE WHO PLAY BY THE RULES PAC



## Illinois State Board of Elections

Information For Voters Campaign Disclosure

Running for Office

Candidate Filing and Results

Business Registration

Press Room

About The Board

#### **State of Illinois Coronavirus Response Site**

### People Who Play By The Rules PAC

Committee ID: 37277

Purpose: Support candidates for statewide and local offices.

Address: 467 Conners Ave Naples, FL 34108

Status: Active

Type of Committee: Independent Expenditure

Creation Date: 3/8/2022

	Officers	
Name	Title	Address
Proft, Dan.	Chair	467 Conners Ave Naples, FL 34108
Proft, Dan.	Treasurer	467 Conners Ave Naples, FL 34108

Reports				
Report Type	Reporting Period	Filed	Pages	Clarification
B-1 (\$1000+ Year Round)	10/1/2022 to 12/31/2022	10/23/2022 10:44:30 PM Filed electronically	4	
B-1 (\$1000+ Year Round)	10/1/2022 to 12/31/2022	10/18/2022 10:38:58 PM Filed electronically	5	
D-2 Quarterly Report	7/1/2022 to 9/30/2022	10/17/2022 11:44:03 PM Filed electronically	21	
B-1 (\$1000+ Year Round)	10/1/2022 to 12/31/2022	10/13/2022 11:35:18 PM Filed electronically	2	
B-1 (\$1000+ Year Round)	10/1/2022 to 12/31/2022	10/8/2022 8:22:57 AM Filed electronically	1	
First Prev 1 2 3 4	5 6 7 8 9 10	3	e 5 🗸 Total Record	İs

Chicago Office 69 W. Washington Suite LL08 Chicago, IL 60602

Phone: 312-814-6440 Fax: 312-814-6485

Illinois Election Statutes **Federal Election Commission** State of Illinois Homepage **Election Assistance Commission**  Glossary **Frequently Asked Questions** 







## **EXHIBIT F**

## PRINTOUT FROM THE CENTER FOR ILLINOIS POLITICS REGARDING PEOPLE WHO PLAY BY THE RULES PAC





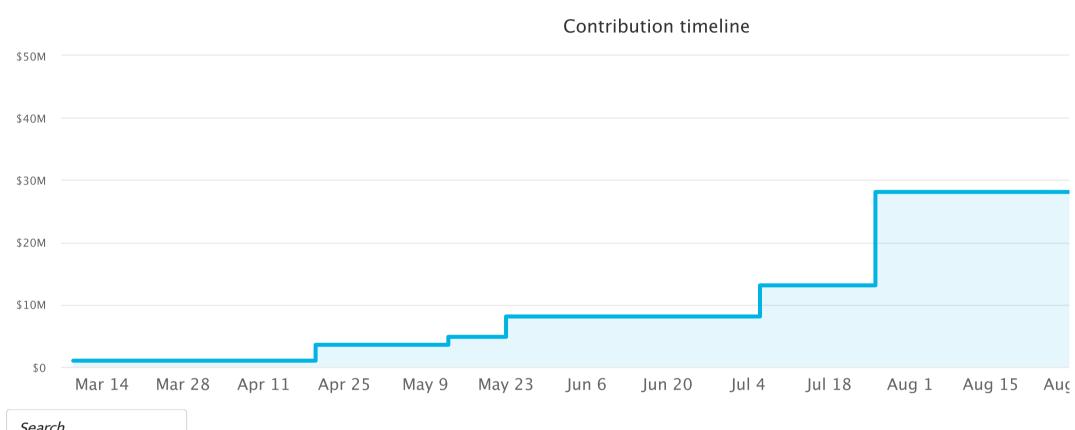
Find... Q

<u>Home Reports Issues IL Campaign Cash Voting guide About Feedback</u> Donate

## People Who Play By The Rules PAC

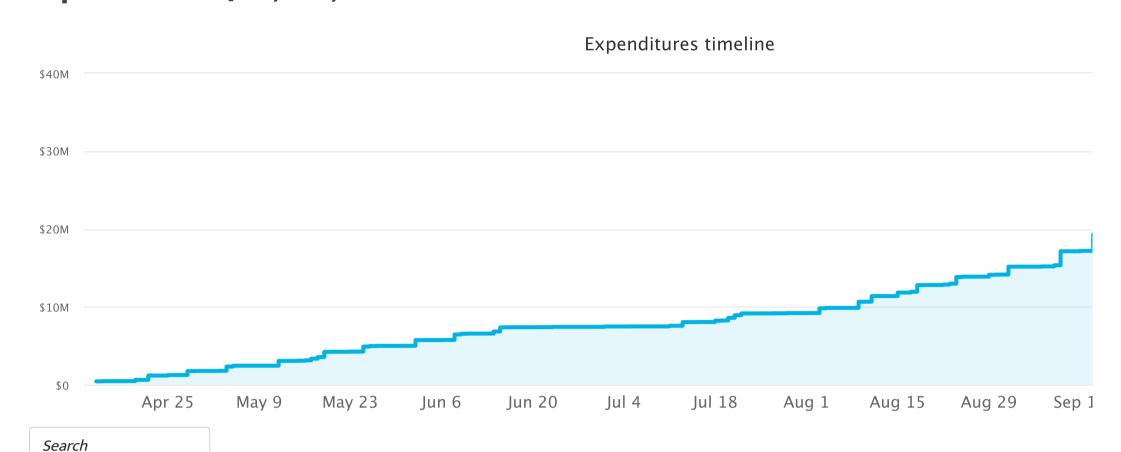
467 Conners Ave Naples, FL 34108

**Contributions: \$42,018,723.45** 



Search			
Donor	Description	Date	Amount
Richard Uihlein		Oct 05, 2022	\$13,923,000
James Anderson		Sep 24, 2022	\$208.2
Kevin Cox		Sep 20, 2022	\$260.25
Nancy Jacobson		Sep 13, 2022	\$155
Nancy Jacobson		Aug 24, 2022	\$100
Richard Uihlein		Jul 26, 2022	\$15,000,000
Richard Uihlein		Jul 06, 2022	\$5,000,000
Richard Uihlein		May 23, 2022	\$3,270,000
Richard Uihlein		May 13, 2022	\$1,275,000
Richard Uihlein		Apr 20, 2022	\$2,550,000
Richard Uihlein		Mar 09, 2022	\$1,000,000

## Expenditures: \$32,960,453.07



Expenditure	Name	Date	Amount
Digital Advertising	Midwest Gap Enterprise	Oct 17, 2022	\$10,000
Media - radio	Polnet Communications Ltd	Oct 17, 2022	\$11,815
Media - radio	Intellectual Radio	Oct 17, 2022	\$10,000
Advertising - radio	Katz Media Group	Oct 14, 2022	\$271,980.63
Media - television	WGN Continental Broadcasting Company	Oct 14, 2022	\$28,050
Media - television	Fox Television Studios, WFLD/WPWR	Oct 14, 2022	\$316,412.5
Media - television	Ampersand HQ	Oct 14, 2022	\$243,803
Media - television	WMAQ c/o NBC Universal	Oct 14, 2022	\$337,110
Media - television	NBC Universal - NSCH	Oct 14, 2022	\$22,100
Media - television	Peacock TV	Oct 14, 2022	\$10,000

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staff@centerforilpolitics.org

(872) 239-4391

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