

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

JEANNE HEDGEPEETH,)
)
Plaintiff,)
)
v.)
)
TIM MCGOWAN,)
)
Defendant.)

Case No. 2021L001776

COMPLAINT

The Plaintiff JEANNE HEDGEPEETH (hereinafter referred to as “HEDGEPEETH”) and for her complaint against the Defendant TIM MCGOWAN (hereinafter referred to as “MCGOWAN”), states:

**COUNT I –
Defamation**

1. At all times relevant hereto, HEDGEPEETH resided in Cook County, Illinois.
2. At all times relevant hereto, MCGOWAN resided at 1459 N. Winslowe Drive, Palatine, Illinois 60074
3. In or about August, 2000, HEDGEPEETH was hired as a teacher at Palatine High School by Township High School District 211.
4. From the time that she was hired, HEDGEPEETH received favorable reviews and accolades from her superiors at Palatine High School.
5. Nevertheless, commencing in June, 2020, MCGOWAN commenced efforts to try to have HEDGEPEETH terminated as a teacher at Palatine High School.

6. On or about June 15, 2020, MCGOWAN posted on his Facebook page and sent to everyone residing in Palatine as well as elsewhere a video in which he made the following false statements about HEDGEPEETH:

- a. Over the years, she has encouraged white students at Palatine High School to disrespect black students.
- b. Over the years, she has encouraged a white student at Palatine High School to disrespect an Indian student in her classroom.
- c. Shortly after President Donald Trump was elected, she allowed a white student to get up and say "I'm glad Donald Trump was elected so he could figure out a way to get rid of these ragheads".
- d. She has been a problem at Palatine High School since 2015.
- e. She has traumatically affected the lives of students in her classroom.
- f. She was destroying lives and validating ignorant little white boys and discouraging a brown lady.
- g. She has dramatically disturbed students at Palatine High School.
- h. Over the eighteen years in which she has been a teacher, she has sent her students off course.

7. At the time that MCGOWAN made these false statements, he knew that these statements were false.

8. MCGOWAN was not privileged to make these false and defamatory statements about HEDGEPEETH since he did not make them for the welfare of any group.

9. Rather, the statements were made solely for the purpose of harming HEDGEPEETH.

10. MCGOWAN concocted these false and defamatory statements without any substantiation and never investigated to confirm the accuracy of these defamatory statements.

11. As a direct and proximate result of MCGOWAN's false and defamatory statements, Township High School District 211 terminated HEDGEPEETH and she has experienced humiliation and damage to her reputation.

WHEREFORE the Plaintiff JEANNE HEDGEPEETH. requests that this Court enter judgment in her favor and against the Defendant TIM MCGOWAN as follows:

- i. Awarding HEDGEPEETH compensatory damages in an amount in excess of \$50,000.00 for MCGOWAN's false, malicious and defamatory statements.
- ii. Awarding HEDGEPEETH punitive damages in an amount to be determined at trial for MCGOWAN's false, malicious and defamatory statements.
- iii. Awarding HEDGEPEETH costs and whatever further relief this Court may deem appropriate.

THE PLAINTIFF DEMANDS TRIAL BY JURY.

**COUNT II –
Intentional Interference with Existing Business Relationship**

1-4. HEDGEPEETH repeats, realleges and incorporates by reference paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count II.

5. At all times relevant hereto, MCGOWAN was aware that HEDGEPEETH was employed by Township High School District 211 as a teacher at Palatine High School.

6. Despite this knowledge, on or about June 15, 2020, MCGOWAN posted on his Facebook page and sent to everyone in Palatine as well as elsewhere a video in which he made the following false statements about HEDGEPEETH:

- a. That over the years, she has encouraged white students at Palatine High School to disrespect black students.
- b. That over the years, she has encouraged a white student at Palatine High School to disrespect an Indian student in her classroom.
- c. Shortly after President Donald Trump was elected, she allowed a white student to get up and say “I’m glad Donald Trump was elected so he could figure out a way to get rid of these ragheads”.
- d. That she has been a problem at Palatine High School since 2015.
- e. That she has traumatically affected the lives of students in her classroom.
- f. That she was destroying lives and validating ignorant little white boys and discouraging a brown lady.

g. That she has dramatically disturbed students at Palatine High School.

h. Over the eighteen years in which she has been a teacher, she has sent her students off course.

7. These false statements made by MCGOWAN were done intentionally and maliciously and without justification to induce Township High School District 211 to terminate HEDGEPEETH.

8. MCGOWAN's conduct was intentional and unjustified and was undertaken in conscious disregard of the irreparable harm it would cause HEDGEPEETH.

9. MCGOWAN engaged in such conduct for the purposes of harming HEDGEPEETH.

10. MCGOWAN was not privileged to make the above-mentioned comments since he rendered these solely for the purposes of harming HEDGEPEETH.

11. As a direct and proximate result of one or more of MCGOWAN's false statements, on July 16, 2020, Township High School District 211 terminated HEDGEPEETH from her employment.

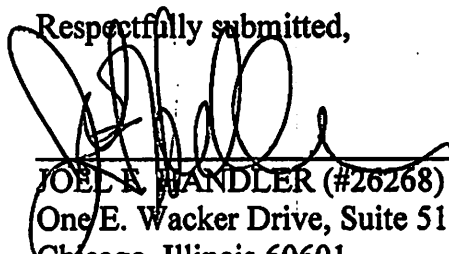
12. MCGOWAN's wrongful acts have directly jeopardized HEDGEPEETH's occupation and, therefore, have injured and damaged her in an amount in excess of \$50,000.00.

WHEREFORE the Plaintiff JEANNE HEDGEPEETH requests that this Court enter judgment in her favor and against the Defendant TIM MCGOWAN as follows:

- i. Awarding HEDGEPEETH compensatory damages in an amount to be determined at trial.
- ii. Awarding HEDGEPEETH punitive damages in an amount to be determined at trial.
- iii. Awarding HEDGEPEETH costs and whatever further relief this Court may deem appropriate.

THE PLAINTIFF REQUESTS TRIAL BY JURY.

Respectfully submitted,



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