

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

JANE DOE,)	
)	
Plaintiffs,)	
)	
v.)	No.
)	
BOARD OF EDUCATION OF CHICAGO)	Hon.
PUBLIC SCHOOL DISTRICT 299; and)	
BRIAN CROWDER, individually and as)	PLAINTIFF DEMANDS
agent of BOARD OF EDUCATION OF)	A TRIAL BY JURY
CHICAGO PUBLIC DISTRICT 299,)	
)	
Defendants.)	

COMPLAINT AT LAW

NOW COMES Plaintiff, JANE DOE, by and through her attorneys, STINAR GOULD GRIECO & HENSLEY, PLLC, and complaining against Defendants, BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL DISTRICT 299, and BRIAN CROWDER, individually and as an agent of BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL DISTRICT 299, pleading hypothetically and in the alternative states as follows:

PARTIES

1. Plaintiff JANE DOE is a resident of Little Village in the City of Chicago, County of Cook, and State of Illinois.
2. Defendant, BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL DISTRICT 299 (“CPS”), is a municipal corporation existing by and under the laws of the State of Illinois, with its principal place of business located in the City of Chicago, County of Cook, Illinois.
3. At all times relevant herein, Defendant, CPS, owned, operated, managed, and/or otherwise controlled schools across Chicago that served the Cook County communities, including Little Village Lawndale High School (“LVLHS”), a public high school located in the city Chicago,

County of Cook, and the State of Illinois.

4. LVLHS is a public high school located in the South Lawndale neighborhood of Chicago, Illinois. The campus contains four autonomous small schools: the Multicultural Academy of Scholarship High School; the Infinity Math, Science and Technology High School; the World Language High School; and the Social Justice High School justice.

5. At all times relevant herein, the Social Justice High School was located 3120 S. Kostner Ave. in the City of Chicago, Cook County, Illinois.

6. At all times relevant herein, Plaintiff JANE DOE was a minor and a student at Social Justice High School.

7. At all times relevant herein, Defendant BRIAN CROWDER, individually and as an agent of BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL DISTRICT 299, was an Illinois citizen and is believed to be a resident County of Cook, and State of Illinois.

FACTUAL ALLEGATIONS

A. History of Sexual Abuse in the Chicago Public Schools

8. Prior to and during the time period Plaintiff was abused, Defendant CPS knew there was a longstanding problem of sexual abuse of minors at its schools, including sexual abuse perpetrated by teachers and other agents of CPS.

9. At all times relevant, CPS did not track child abuse by its employees or agents in a publicly available format.

10. As a result of this failure to track and disclose, the Chicago Tribune engaged in and published an investigative series titled “Betrayed,” which uncovered statistics and information regarding child sexual abuse at CPS’s public schools.¹

¹ David Jackson, Jennifer Smith Richards, Gary Marx, Juan Perez Jr., *BETRAYED Chicago schools fail to protect students from sexual abuse and assault, leaving lasting damage*, Chi. Trib., (July 17, 2018),

11. The Chicago Tribune revealed that from 2008 through 2017, Chicago police investigated 523 reports that children were sexually assaulted or abused inside CPS's public schools.

12. The Tribune also reviewed several other elements including but not limited to criminal charges and prosecutions, lawsuits filed by victims, and CPS investigative reports.

13. Tribune reporters spoke to current and former students who reported abuse at the hands of school employees.

14. The Tribune reported that assaults and abuse that CPS found took place at schools across the entire city. *See e.g., Figure 1* below.

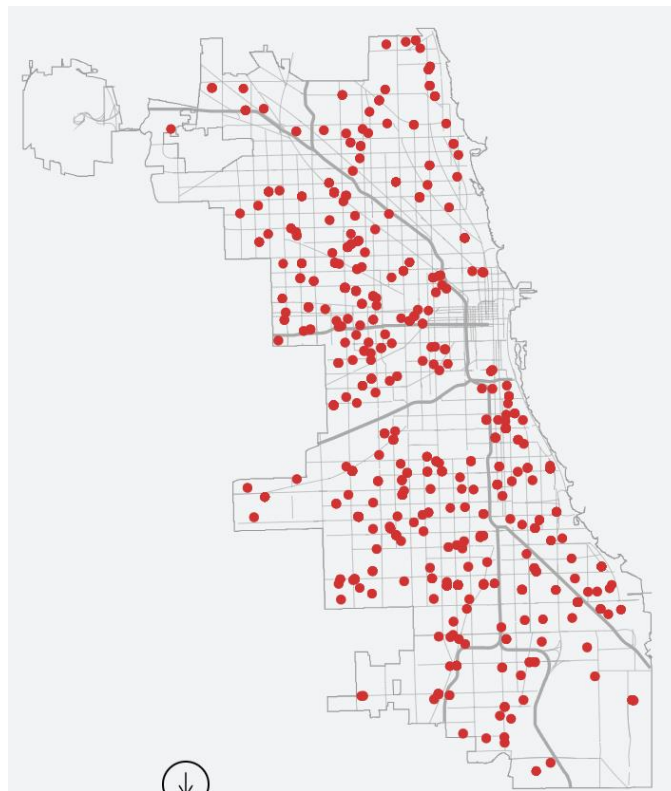


Figure 1

15. Throughout that ten-year span, the Tribune found that 72 employees of CPS were

identified as alleged perpetrators of child sexual abuse.

16. The Chicago Tribune's Betrayed Series also spotlighted certain specific instances of the abuse that occurred within CPS' schools.

17. For example, at Hubbard High School, one of CPS's public schools, former students and a former employee began reporting instances of sexual abuse of students by a school security guard as early as 2011.

18. Despite these reports of abuse, the security guard was able to maintain his employment, directly dealing with the students for three more years until 2014.

19. The security guard at Hubbard Highschool was ultimately convicted of aggravated criminal sexual abuse and aggravated battery for his abuse of students.

20. In 2014, it was discovered that a track coach at Simeon Highschool, a CPS School, raped a student over forty times and groped two other students.

21. The track coach had multiple felony convictions before being hired at Simeon.

22. The abuse of these students was not discovered until a non-CPS employee who came to CPS to run a peer health education program for female athletes learned of inappropriate touching by the teacher.

23. The victims came forward as a result of the support and encouragement of the non-CPS employee.

24. Per the Chicago Tribune, CPS has stated that it disciplines about ten principals per year for failing to promptly report sexual abuse.

25. Upon information and belief, CPS had not reported any employees to law enforcement for failing to comply with their mandatory reporting requirements during the timeline that was reviewed by the Tribune.

26. After the Chicago Tribune made CPS aware of its findings in 2018, CPS surrendered responsibility for investigating adult-on-student sexual abuse allegations to the Illinois Office of the Inspector General (“OIG”).

27. Further, after the Chicago Tribune made CPS aware of its findings in 2018, CPS required new background checks for all employees, vendors, coaches, and level one volunteers.

28. As a result of the new background checks, 266 Chicago Public School employees were unable to return to work for the 2018-2019 school year.

29. After the Chicago Tribune sent its findings to CPS in 2018, CPS hired the Shiff Hardin law firm and a former Illinois Executive Inspector General to conduct “a top-to-bottom review” of the school system’s response to sexual abuse.

30. The 2018 Shiff Hardin report found “systemic deficiencies in training, reporting, aggregating data, tracking trends, and comprehending the extent of the sexual misconduct facing CPS children. These deficiencies occurred at all levels: in the schools, the networks, the Central Office, and the Chicago Board of Education (Board).”

31. The 2018 Shiff Hardin report made a series of recommendations to improve prevention strategies within CPS.

32. Despite Shiff Hardin’s recommendations regarding prevention, a total of 2,188 reports of sexual allegations from students against employees of CPS—over four times the amount placed between 2010 and 2018—were received from the date the OIG took over investigatory responsibilities until December 31, 2023.

33. Over those five years, the OIG substantiated policy violations in 363 sexual misconduct cases—over five times the amount found for the 2010-2018 period that the Chicago Tribune reviewed.

34. The 363 substantiated violations over a 5-year period equates to more than one substantiated claim per week since CPS surrendered control of its investigatory powers.

B. Sexual Abuse and Grooming at Little Village Lawndale High School.

35. At all times relevant herein, a cadre of school administrators and teachers at CPS's Lawndale Little Village Lawndale High School were grooming, preying upon, and abusing students.

36. These teachers and administrators were aware of the abuses within the CPS's system, often targeting the same victims at the same times.

37. On more than one occasion, reviews of survivors' phones unveiled sexually explicit messages from multiple teachers and/or administrators to a singular student.

38. LVLHS Campus opened its doors to four hundred students in the fall of 2005.

39. The campus is comprised of four autonomous small schools: Multicultural Arts H.S., World Language H.S., Social Justice H.S., and Infinity: Math, Science, and Technology High School. Each school has its own principal and teaching staff.

40. Each school seats approximately 385 to 400 students from the neighborhoods of North Lawndale and Little Village.

41. In addition to the longstanding history of employees sexually abusing students throughout the CPS system as a whole, several teachers and/or administrators at the LVLHS, including Defendant Crowder, were grooming and/or sexually abusing students prior to, during, and after the abuse of Plaintiff Jane Doe.

42. Upon information and belief, at all relevant times, these teachers and/or administrators were aware Defendant Crowder was grooming and abusing Plaintiff while she was a student at the school, and a minor, and failed to report it to civil authorities, including the Illinois

Department of Child Services (DCFS).

43. Upon information and belief, a teacher at Infinity High School was investigated for attempting to sleep with a recent graduate at a graduation party.

44. Upon information and belief, said teacher was subsequently investigated for grooming said student by OIG and decided to resign to avoid further inquiry.

45. Upon information and belief, another teacher at CPS' LVLHS School was investigated for grooming students online.

46. Upon information and belief, said teacher would repeatedly ask students to meet him late at night, and sexually abused at least one student.

47. Upon information and belief, an Administrator at Infinity High School had sexual relations with a student a week after graduation after grooming student while she was attending Infinity High School.

48. Upon information and belief, in around 2014/2015, said Administrator at Infinity High School made sexually explicit comments and propositions to several students directly in front of other male employees of while in the school, including statements like "damn that ass" and "you have thick, juicy legs."

49. Upon information and belief, these lewd remarks were reported to a female teacher, but the teacher failed to report the abuse to DCFS.

50. Upon information and belief, another teacher at Infinity High School had repeatedly sexually abused at least two students at the school. During the investigation by law enforcement, it was discovered that another teacher also sent sexually explicit text messages to the same student.

51. Upon information and belief, another teacher at Infinity High School groomed around sixteen students while a teacher at the school, targeting his former students immediately

after they graduated, including encouraging the former students to send pornographic videos to the teacher.

52. Upon information and belief, each of these abusers were working at CPS' LVLHS while CROWDER was employed there.

53. Upon information and belief, many of these abusers were working at CPS' LVLHS while DOE was a student there.

54. Upon information and belief, many of the abuses described above occurred at LVLHS while DOE was a student there.

55. Upon information and belief, these abusers openly shared information with each other regarding their abuse of students, and laughed about it.

C. Factual Allegations Specific to Abuse of Jane Doe.

56. Beginning in or about 2013 and continuing into 2016, JANE DOE was enrolled as a CPS student at Little Village Lawndale High School.

57. At all times relevant herein, JANE DOE was a minor. She was born in 1998.

58. JANE DOE was a Little Village Lawndale High School student at the Social Justice Highschool between 2012 and 2016.

59. Beginning in around 2012, and at all times relevant herein, Defendant BRIAN CROWDER was the Dean of Students at Little Village Lawndale High School and was employed by CPS.

60. Defendant CROWDER's introduction to and contact with JANE DOE arose directly from CROWDER's role as Dean of LVLHS and as an employee and agent of CPS.

61. While JANE DOE was a minor and a student Defendant CROWDER requested DOE's "SnapChat" account name.

62. SnapChat is a multimedia instant messaging service.
63. One of the principal features of Snapchat is that pictures and messages are usually only available for a short time before they become inaccessible to their recipients, and out of the reach of the judicial system.
64. Defendant CROWDER subsequently sent DOE a friend request on SnapChat.
65. CROWDER confronted DOE when she did not accept the request, asking why DOE did not accept CROWDER's request.
66. DOE relented and added CROWDER on SnapChat.
67. Almost immediately, CROWDER began grooming DOE over SnapChat.
68. Over time, CROWDER began sending increasingly inappropriate images to DOE via SnapChat.
69. CROWDER would send sexually explicit messages to DOE while DOE was in class and while CROWDER was working as Dean of Students in the same building.
70. After sending explicit snapchats for a period of time, CROWDER began taking DOE on dates, where he would pick up DOE in his vehicle.
71. On at least one occasion an LVLHS employee, who was DOE's teacher and CROWDER's neighbor, observed CROWDER driving DOE to CROWDER's home.
72. At some point during DOE's sophomore year at LVLHS, CROWDER began repeatedly sexually abusing DOE, including but not limited to coercing oral sex and penetration.
73. At all times relevant herein, all teachers, faculty, staff, administration, and other agents at LVLHS were mandatory reporters according to the Illinois Abused and Neglected Child Reporting Act (325 ILCS 5/3).
74. Throughout the time that JANE DOE was being sexually abused by Dean

CROWDER, many faculty, staff, and administrators in the office would joke about how much time was spent alone between CROWDER and JANE DOE in CROWDER's office, and make jokes about a romantic interest.

75. As a result of the lack of concern by the CPS employees at LVLHS, the sexual abuse continued.

76. Dean CROWDER impregnated DOE on several occasions, the first time when she was 15 years old.

77. Dean CROWDER subsequently coerced DOE to have an abortion.

78. Dean CROWDER told DOE that he loved DOE and that if she would receive the abortion, they could have children together when she is an adult. He also made comments to DOE designed to intimidate and scare her.

79. In around April 2015, Dean CROWDER took DOE to receive an abortion.

80. Illinois law required a parent to be present and consenting for an abortion to be performed on a minor pursuant to the Illinois Parental Notice of Abortion Act until June 1, 2022.

81. Rather than abiding by the law, Dean CROWDER fraudulently told the staff at the abortion clinic that he was a parent of DOE.

82. Dean CROWDER drove DOE to obtain the abortion.

83. Following the abortion, Doe lived in constant fear, and would cry regularly before and after going to and from the school where CROWDER was the Dean of Students.

84. As a result of CROWDER being in charge of discipline of teachers and students, DOE did not feel that she could tell anyone about what had happened.

85. At one point during the abuse a chemistry teacher at LVLHS' Social Justice HighSchool, and an agent of CPS, approached DOE upon noticing that DOE was visibly

distraught to ask if DOE was alright.

86. DOE reported to the teacher about the sexual and emotional relationship (and abuse) involving Dean CROWDER.

87. DOE told the teacher that DOE and CROWDER were having sexual intercourse, and that he said he had loved her.

88. The chemistry teacher told DOE that it was ultimately DOE's decision whether to report it to someone else or not.

89. DOE felt unable to report it to anyone else, as she was fearful for what CROWDER might do.

90. The chemistry teacher failed to report or otherwise stop the sexual abuse DOE was suffering.

91. The chemistry teacher continued to regularly ask DOE about DOE and CROWDER's "relationship" throughout the remainder of DOE's time at LVLHS.

92. The sexual abuse continued after it was reported to an LVLHS teacher.

93. DOE became pregnant a second time as a result of the abuse and grooming of CROWDER.

94. CROWDER subsequently forced DOE to receive a second abortion, again telling DOE that he loved her and that they could have children together when she was older.

95. DOE continued being sexually abused by CROWDER throughout the remainder of high school.

96. Dean CROWDER used his position of trust and authority between 2012-2016 to influence JANE DOE to initiate sexual activities with him, such as intercourse (statutory rape).

97. Dean CROWDER continued to sexually and psychologically abuse, manipulate,

and exploit JANE DOE on a regular basis for the remainder of her time at LVLHS.

98. Throughout the years of abuse, DOE would see CROWDER nearly every period in the halls through the day.

99. Throughout the years of abuse, CROWDER would frequently send text messages and “SnapChats” to DOE while she was in class.

100. As a result of CROWDER’S years of persistent sexual abuse, DOE became unable to focus or feel safe in school, impacting her grades and education.

101. From the time the abuse began until DOE left LVLHS, DOE’S teachers would frequently get angry at DOE for being unable to focus in class.

102. Upon information and belief, during the time period Plaintiff was abused, Dean CROWDER told other teachers and/or administrators he was friends who were also grooming students at LVLHS about the sexual relationship with JANE DOE, a minor. None of the teachers and/or administrators reported the abuse to DCFS or OIG.

103. As set forth herein, CPS had actual and constructive notice of unlawful sexual conduct perpetrated by its employees against its students.

104. As set forth herein, CPS had actual and constructive notice that the relationship between Dean CROWDER and JANE DOE had escalated to include statutory rape, physical, or sexual conduct between its employees and students.

105. Dean CROWDER’S grooming, psychological abuse, physical abuse, sexual abuse and exploitation of JANE DOE has caused JANE DOE to have serious and permanent psychological and physical injuries.

106. Defendant CPS, by and through its administration, faculty, staff, and other agents allowed Dean CROWDER’S grooming and exploitation of JANE DOE, a student in their care, to

occur and continue to occur throughout JANE DOE'S time at LVLHS from 2012-2016 once it had actual and/or constructive notice of the inappropriate relationship.

107. Defendant CPS, by and through its administration, faculty, staff, and other agents violated the Illinois Abused and Neglected Child Reporting Act (325 ILCS 5/3) when they failed to immediately report to civil authorities and law enforcement, including the Illinois DCFS, the known, reported, and/or suspected abuse and exploitation involving JANE DOE, a minor student, and an adult educator at the school, BRIAN CROWDER.

108. The silence and inaction of CPS, by and through its administration, faculty, staff, and other agents, facilitated BRIAN CROWDER'S grooming and exploitation of JANE DOE, a student in their care, for the duration of her time as a student at LVLHS from 2012-2016.

109. The actions and omissions of CPS, by and through its administration, faculty, staff, and other agents, ratified BRIAN CROWDER'S grooming and exploitation of JANE DOE, a student in their care, for the duration of her time as a student at LVLHS from 2012-2016.

110. As a direct and proximate result of the unlawful actions of Defendants, Plaintiff JANE DOE has suffered and continues to suffer severe and permanent injuries and damages, including without limitation severe and permanent psychological and emotional distress; physical manifestations of the aforesaid emotional distress; diminished ability to enjoy her life; loss of education; lost earnings and diminished earning capacity; and has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling, severe and permanent psychological, educational, and emotional injuries and damages, all of which caused and continue to cause JANE DOE great pain and suffering, mental and emotional distress, and have resulted in her diminished ability to enjoy her life, and is thus entitled to an award of monetary damages from the Defendants.

COUNT I – WILLFUL AND WANTON CONDUCT

***JANE DOE V. BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL DISTRICT 299
and JANE DOE V. BRIAN CROWDER, an agent of BOARD OF EDUCATION OF
CHICAGO PUBLIC SCHOOL DISTRICT 299,***

111. JANE DOE realleges and incorporates Paragraphs 1-110 above as though fully stated herein.

112. At all times relevant herein, Defendant CPS was an educational institution charged with providing public school education and received state financial assistance.

113. At all times relevant herein, CPS had a duty to refrain from acting with an utter indifference and/or conscious disregard for the safety of its students, including JANE DOE.

114. At all times relevant herein, CPS had a duty to provide a safe, secure, and protective environment for its students at LVLHS, including JANE DOE.

115. At all times relevant herein, CPS had a duty to its students for the highest degree of care, including duty to discover and prevent danger to students and to protect them from the foreseeable dangerous conduct of teachers, administrators, and other school staff.

116. In the alternative, CPS owed a duty to refrain from willful and wanton conduct, including the duty to investigate improper conduct of teachers, administrators, and other school staff and to keep their students in a safe environment, when on notice that their safety was threatened.

117. At all times relevant herein, CPS had a policy to require any employee who suspects or receives knowledge that a student may be sexually harassed or abused to immediately report such knowledge to the appropriate officials.

118. At all times relevant herein, pursuant to the Illinois Abused and Neglected Child Reporting Act, CPS and its teachers and staff had a legal duty to immediately notify and report to

the Illinois Department of Family and Child Services (DCFS) all instances where they suspect or receive knowledge that a student may be sexually or psychologically harassed, abused, and/or groomed.

119. Notwithstanding these duties and policies, Defendant CPS, by and through their agents, employees, and/or servants, included but not limited to BRIAN CROWDER, committed one or more of the following willful and wanton acts and/or omissions in reckless or careless disregard for the safety and welfare of JANE DOE:

- a. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, perpetuated a system and procedures that downplayed reporting and failed to thoroughly investigate sexual assault and harassment of students by teachers throughout the District;
- b. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, retained Defendant CROWDER after he had been accused of sexual misconduct with JANE DOE;
- c. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, failed to properly investigate CROWDER after receiving complaints of inappropriate sexual conduct with JANE DOE;
- d. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, willfully and wantonly failed to properly monitor the activities of Defendant CROWDER, who they knew, or should have known, had been sexually assaulting and abusing JANE DOE;
- e. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, allowed CROWDER to spend significant time with JANE DOE outside of class and school hours, including driving him home in her personal vehicle;
- f. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, failed to train teachers and employees about how and when to report allegations of sexual abuse and misconduct involving students;
- g. With an utter indifference and/or conscious disregard for the safety of their student, JANE DOE, failed to train teachers and employees how to identify the clear warning signs that a student was being groomed and/or abused;
- h. With an utter indifference and/or conscious disregard for the safety of its student, JANE DOE, Defendant CPS failed to stop Defendant CROWDER from harming JANE DOE when they knew that CROWDER was persistently seeking time alone with JANE DOE;
- i. With an utter indifference and/or conscious disregard for the safety of its student, JANE DOE, Defendant CPS took no action to investigate Defendant CROWDER when they knew that CROWDER was persistently seeking time alone with JANE DOE;

- j. With an utter indifference and/or conscious disregard for the safety of its student, JANE DOE, Defendant CPS took no action to investigate Defendant CROWDER despite a report by JANE DOE's mother of inappropriate behavior by CROWDER and suspected sexual contact between CROWDER and JANE DOE;
- k. With an utter indifference and/or conscious disregard for the safety of its student, JANE DOE, Defendant CPS failed to make a report regarding CROWDER and JANE DOE to the Illinois Department of Child and Family Services or to any other law enforcement agency; and/or
- l. Was otherwise willful and wanton and/or otherwise acted with reckless disregard.

120. Defendant CPS, through their employees and agents, failed to take the required steps according to their own policies that were a direct and proximate cause of the sexual and psychological abuse of JANE DOE.

121. As a direct and proximate cause and result of one or more of the willful and wanton acts of the Defendants, JANE DOE was sexually and psychologically abused by Defendant CROWDER and as a result suffered severe psychological, educational, and emotional injuries, all of which caused her great mental and emotional distress and have resulted in her diminished ability to enjoy her life.

WHEREFORE, the Plaintiff asks Court to enter judgment in her favor and against Defendants CPS and CROWDER for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

COUNT II – NEGLIGENT RETENTION – WILLFUL AND WANTON
(Jane Doe v. Defendant BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL
DISTRICT 299)

122. Plaintiff realleges and incorporates Paragraphs 1-122 as though fully stated herein.

123. At all times relevant, Defendant CPS's actual agent Defendant CROWDER was acting in his official capacity.

124. In approximately 2015, JANE DOE reported the abuse she was suffering by CROWDER' to her chemistry teacher, an agent of CPS.

125. Prior to this meeting, Defendant CROWDER had acted dangerously and/or recklessly regarding the well-being and safety of students at LVLHS.

126. Defendants CPS knew Defendant CROWDER posed a danger of harm to students.

127. At all times relevant herein, Defendant CROWDER was hired and worked as a staff member under CPS's control.

128. At all times relevant herein, JANE DOE was under CPS's care and custody, including through Defendant CROWDER.

129. At all times relevant herein, there existed a duty on the part of CPS to refrain from conduct that would likely and probably result in sexual abuse and harm to JANE DOE.

130. At all times relevant herein, there existed a duty on the part of Defendant CPS to refrain from retaining employees who posed a risk of harm to the public and their students, including JANE DOE.

131. That at the aforesaid time, CPS, in disregard of its duty, committed the following willful and wanton acts or omissions:

- a. Retained Defendant CROWDER as an employee of CPS;
- b. Failed to properly train Defendant CROWDER with regards to the discipline and/or consequences for sexually abusing or touching students;
- c. Retained Defendant CROWDER despite violations of policies regarding his duties, responsibilities, and student safety;
- d. Failed to discipline or reprimand Defendant CROWDER after receiving notice of his misconduct;
- e. Failed to terminate Defendant CROWDER;
- f. Failed to report Defendant CROWDER for sexual abuse of a minor;
- g. Failed to properly investigate Defendant CROWDER even after Plaintiff brought the abuse of Plaintiff to their attention;
- h. Failed to properly investigate the sexual abuse of JANE DOE, including but not limited to: failure to document and process the evidence; failure to conduct an unbiased investigation; failure to treat, investigate or question

Defendant CROWDER as a suspect; and failure to conduct witness interviews;

- i. Defendant CPS failed to inform Jane DOE's parents of the outcome of any such investigation; and/or
- j. Was otherwise willful and wanton.

132. As a direct and proximate result of one or more of the foregoing willful and wanton acts or omissions on the part of CPS, JANE DOE experienced emotional, mental, and psychological pain and injury.

133. As a direct and proximate result of the acts and omissions set forth above, JANE DOE suffered and continues to suffer severe and permanent psychological, educational, and emotional injuries and damages, all of which caused and continue to cause JANE DOE great pain and suffering, mental and emotional distress, and have resulted in her diminished ability to enjoy her life, and is thus entitled to an award of monetary damages from the Defendants.

WHEREFORE, the Plaintiff asks this Court to enter judgment in her favor and against Defendant CPS for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

COUNT III: BATTERY
(Jane Doe v. Brian Crowder, Individually)

134. Plaintiff realleges and incorporates Paragraphs 1-133 as though fully stated herein.

135. From approximately December 2012-2016, and at all times relevant hereto, Defendant CROWDER repeatedly engaged in un-permitted, harmful, and offensive sexual contact upon the person of Plaintiff JANE DOE.

136. At all times relevant hereto, JANE DOE was a minor below the statutory age of consent in the State of Illinois and was therefore unable to consent to any sexual contact by an adult.

137. At all times relevant hereto, Defendant CROWDER was an adult, over the age of legal majority.

138. At all times relevant hereto, Defendant CROWDER knew that JANE DOE was a minor below the statutory age of consent in the State of Illinois, and that JANE DOE was therefore unable to consent to any sexual contact by an adult.

139. At all times relevant hereto, Defendant, CROWDER, was acting within the scope of her employment and/or agency relationship with Defendant CPS.

140. At all times relevant hereto, Defendant CROWDER had a duty to exercise reasonable care, so as to avoid causing injury and/or harmful or offensive contact to JANE DOE.

141. Notwithstanding said duty, Defendant, CROWDER, intentionally and unlawfully made harmful and offensive contact with JANE DOE, which included but was not limited to psychological and emotional manipulation and abuse, as well as repeated sexual abuse.

142. As a direct and proximate result of the unlawful actions of Defendants, Plaintiff JANE DOE has suffered and continues to suffer severe and permanent injuries and damages, including but not limited to severe and permanent psychological and emotional distress; physical manifestations of the aforesaid emotional distress; diminished ability to enjoy her life; loss of education; lost earnings and diminished earning capacity; and has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling, and is thus entitled to an award of monetary damages from the Defendants.

WHEREFORE, Plaintiff JANE DOE prays for judgment against Defendant, BRIAN CROWDER, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

COUNT IV: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
(Jane Doe v. BRIAN CROWDER, Individually)

143. Plaintiff realleges and incorporates Paragraphs 1-142 as though fully stated herein.

144. At the times mentioned aforesaid, Defendant CROWDER had a duty to exercise reasonable care, so as to avoid causing emotional injury and/or emotional distress to JANE DOE.

145. Notwithstanding said duty, Defendant CROWDER failed to exercise reasonable care so not to cause emotional injury and/or emotional distress to JANE DOE when Defendant CROWDER repeatedly engaged in un-permitted, harmful and offensive sexual contact upon the person of JANE DOE, a vulnerable minor.

146. Notwithstanding said duty, Defendant CROWDER failed to exercise reasonable care so not to cause emotional injury and/or emotional distress to JANE DOE when Defendant CROWDER repeatedly engaged in harmful psychological and emotional manipulation and abuse of JANE DOE, a vulnerable minor.

147. As a direct and proximate result of the unlawful actions of Defendant, CROWDER, JANE DOE sustained serious injuries and damages, including but not limited to severe emotional distress requiring medical attention, anxiety, and severe panic attacks with physical symptoms.

WHEREFORE, Plaintiff JANE DOE prays for judgment against Defendant, BRIAN CROWDER, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

COUNT V: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Jane Doe v. BRIAN CROWDER, Individually)

148. Plaintiff realleges and incorporates Paragraphs 1-147 as though fully stated herein.

149. At the times mentioned aforesaid, Defendant CROWDER had a duty to avoid intentionally and recklessly causing emotional injury and/or emotional distress to JANE DOE.

150. Notwithstanding said duty, Defendant CROWDER intentionally and recklessly caused emotional injury and/or emotional distress to JANE DOE when Defendant CROWDER repeatedly engaged in un-permitted, harmful and offensive sexual contact upon the person of JANE DOE.

151. Notwithstanding said duty, Defendant CROWDER failed to exercise reasonable care so not to cause emotional injury and/or emotional distress to JANE DOE when Defendant CROWDER repeatedly engaged in harmful psychological and emotional manipulation and abuse of JANE DOE, a vulnerable minor.

152. As a direct and proximate result of the intentional and reckless unlawful actions of Defendant CROWDER, JANE DOE sustained serious injuries and damages, including but not limited to severe emotional distress requiring medical attention, anxiety, and severe panic attacks with physical symptoms.

WHEREFORE, Plaintiff JANE DOE prays for judgment against Defendant, BRIAN CROWDER, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

COUNT VI –RESPONDEAT SUPERIOR
(Jane Doe v. Defendant BOARD OF EDUCATION OF CHICAGO PUBLIC SCHOOL
DISTRICT 299)

153. Plaintiff realleges and incorporates Paragraphs 1-114, 138-157 as though fully stated herein.

154. The aforesaid acts of Defendant CROWDER, in his individual capacity, were in the scope of employment, undertaken with willful and wanton disregard for the Plaintiff's safety and therefore CPS, as principal, is liable for the actions of its agents under the doctrine of *respondeat superior*.

WHEREFORE should Defendant CROWDER, in his individual capacity, be found liable for any state claims alleged herein, Plaintiff demands judgment against Defendant CPS for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs, with interest, of bringing this action, and for such other further relief this Court deems appropriate and just.

JURY DEMAND

155. Plaintiffs JANE DOE hereby demands a trial by jury.

Dated: April 10, 2024

Respectfully Submitted,

STINAR GOULD GRIECO & HENSLEY

By: /s/ Martin D. Gould

Attorney for Plaintiff

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