

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CANDACE WARD, as next of)
friend and on behalf of her minor)
daughters, A.S. and S.G.,)

Plaintiff,)

v.)

OAK PARK ELEMENTARY)
SCHOOL DISTRICT 97)
BOARD OF EDUCATION, and)

LAUREN BROWN, as an)
individual and in her official)
capacity as employee of OAK)
PARK ELEMENTARY SCHOOL)
DISTRICT 97, and)

AMY JEFFERSON, as an)
individual and in her official)
capacity as employee of OAK)
PARK ELEMENTARY SCHOOL)
DISTRICT 97, and)

JASON MORRELL, as an)
individual and in his official)
capacity as employee of OAK)
PARK ELEMENTARY SCHOOL)
DISTRICT 97,)

Defendants.)

Case No. 1:24-cv-09443

**PLAINTIFF DEMANDS TRIAL
BY JURY**

COMPLAINT AT LAW

NOW COMES, Plaintiff, CANDACE WARD, as next of friend and on behalf of her minor daughters, A.S. and S.G., by and through her attorney, JEM LAW ADVOCATES, P.C., and for her Complaint at Law against the Defendants, OAK PARK ELEMENTARY SCHOOL

DISTRICT 97 BOARD OF EDUCATION, LAUREN BROWN, AMY JEFFERSON, and JASON MORRELL, states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over federal questions pursuant to 28 U.S.C. §1343 and redressing violations of civil rights pursuant to 28 U.S.C. §1343, as well as supplemental jurisdiction over Illinois state law claims pursuant to 28 U.S.C. §1367.

2. Venue is proper in the Northern District of Illinois, Eastern Division pursuant to 28 U.S.C. §1391 as the parties reside and/or conduct business in this judicial district, and the events giving rise to the claims asserted herein also occurred in this judicial district.

THE PARTIES

3. Plaintiff, Candace Ward (hereinafter, “Ms. Ward”), is the mother of A.S. and S.G., both minors, and is an individual citizen of Illinois, residing in Oak Park, Illinois.

4. Defendant, Oak Park Elementary School District 97 Board of Education d/b/a Oak Park Elementary School District 97 (hereinafter, “District 97”), is a public education school district and governmental body operating in Cook County, Illinois, and headquartered at 260 Madison Street, Oak Park, IL 60302.

5. Defendant, Lauren Brown (hereinafter, “Brown”), upon information and belief, is and was at all relevant times employed as a seventh-grade social sciences teacher by District 97.

6. Defendant, Amy Jefferson (hereinafter, “Jefferson”), upon information and belief, is and was at all relevant times employed as a principal by District 97.

7. Defendant, Jason Morrell (hereinafter, “Morrell”), upon information and belief, is and was at all relevant times employed as a teacher by District 97.

FACTS

8. Candace Ward is an African American female and parent to A.S and S.G.

9. Ms. Ward's children have attended District 97 schools since 2018.

10. Ms. Ward and her children have been the target of racial discrimination, harassment and retaliation by District 97 and its employees for more than three years.

11. A.S. is a thirteen-year-old, African American girl who loves to learn. She is currently enrolled for the 2024 – 2025 academic year as an eighth-grade student at Julian Middle School (hereinafter, "Julian"), and was a seventh-grade student at Julian at all relevant times during the 2023 – 2024 school year.

12. S.G. is an eleven-year-old, African American girl who has a heart for learning. She is currently enrolled for the 2024 – 2025 academic year as a sixth-grade student at Julian.

13. Julian is a middle school in Oak Park, Illinois that was at all relevant times and is operated by and under the control of District 97.

**Defendant Amy Jefferson's Racially Discriminatory, Harassing, and Retaliatory Actions
Against Ms. Ward, A.S. and S.G.**

14. On August 8, 2023, Ms. Ward spoke at the District 97 Board of Education meeting asking for Defendant District 97's support in resolving ongoing discriminatory treatment by Defendant Amy Jefferson who, upon information and belief, was at all relevant times and is Principal of Longfellow Elementary School (hereinafter, "Longfellow"), an elementary school in Oak Park, Illinois that was and is operated by and under the control of Defendant District 97.

15. While Ms. Ward did not name each incident of discrimination she and her children had been subjected to, Defendant District 97 knew or should have known of Ms. Ward's numerous complaints against Defendant Jefferson, including Defendant Jefferson's failure to

appropriately respond to S.G. being called the “N” word by a white, male student (hereinafter, “Student 1”).

16. Upon information and belief, Student 1 was not disciplined for calling S.G. a racial slur.

17. There were no offers of support for S.G. after being called this deeply offensive racial epithet.

18. Ms. Ward’s mother, Yvette Stringer, also spoke at the August 8, 2023, District 97 Board of Education meeting, stating that she too had been subjected to discriminatory treatment by being removed from an open house event simply because she is related to Ms. Ward. Ms. Stringer similarly asked Defendant District 97 to intervene such that Ms. Ward, A.S. and S.G. would receive adequate support in the upcoming school year.

19. Following the August 8, 2023, District 97 Board of Education meeting, Ms. Ward met with Dr. Ushma Shah, Superintendent; Patrick Robinson, Assistant Superintendent of Elementary Schools; Dr. Felicia Starks Turner who, upon information and belief, was the Associate Superintendent of Education and Chief Safety Officer at that time; and District 97 Board Member Cheree Moore. Ms. Ward again shared her experiences of racial discrimination at the hands of Defendant Jefferson while A.S. and/or S.G. were students at Longfellow during the 2021 – 2022, 2022 – 2023, and 2023 – 2024 school years. The meeting concluded without adequate resolution.

20. On March 19, 2024, Ms. Ward and A.S. spoke at the District 97 Board of Education meeting.

21. Ms. Ward, addressing Defendant District 97 for the second time during the 2023 – 2024 school year, begged Defendant District 97 to address ongoing racial discrimination and

harassment she and her family had been subjected to by Defendant District 97 and its employees, including Defendant Jefferson.

22. Ms. Ward again summarized the trauma she and her family had sustained resulting from Defendant Jefferson's ignoring legitimate concerns Ms. Ward raised related to discriminatory and harassing treatment towards A.S. and S.G.

23. In her address to Defendant District 97, A.S. shared the impact of being "locked" in a room by Defendant Jefferson, having a school nurse inappropriately respond to A.S.'s menstrual cycle, and the humiliation she and S.G. sustained by watching Defendant Jefferson use her authority to continually discriminate against and harass Ms. Ward.

24. A.S. told Defendant District 97 that because of its failure to intervene and stop the racial discrimination and harassment, she has anxiety and has had thoughts of self-harming.

25. In retaliation for Ms. Ward's and A.S.'s statements, Defendant Jefferson had her sister, Lola Jefferson, contact Ms. Ward's employer in early April 2024, and falsely state that Ms. Ward had "jumped" Defendant Jefferson. Lola Jefferson also stated that she planned to report Ms. Ward to the Illinois Department of Financial & Professional Regulation (hereinafter, "IDFPR").

Defendant Lauren Brown's Racially Discriminatory Lesson with Authentic Cotton and Other Harassing Action Against A.S.

26. On April 2, 2024, Defendant Lauren Brown, a white female, operating in her official capacity and as an agent of Defendant District 97, taught a lesson related to slavery and the cotton gin to a seventh-grade social sciences class. A.S. was present for the lesson.

27. During her instruction, Defendant Brown played a “game” with her students, which entailed the students putting their hands into a box to determine its contents. Brown had placed authentic cotton in the box.

28. Defendant Brown gave A.S. a bag of cotton with instructions that A.S. should take it home and show it to her mother.

29. Defendant Brown gave another bag of cotton to the other Black student in her class.

30. Upon information and belief, Defendant Brown did not give cotton to any non-Black student to take home.

31. After school, A.S. showed the bag of cotton to Ms. Ward, described Defendant Brown’s lesson and instruction that A.S. should take the cotton home to show her mother.

32. On or about the same date, Ms. Ward notified Defendant District 97 via a Facebook post, in which Defendant District 97 was tagged, expressing concern that Defendant Brown used authentic cotton during a lesson on slavery and had given A.S. cotton to take home. Ms. Ward included a photograph of the bag of cotton in the post.

33. Troubled by Defendant Brown’s instruction and the impact of the lesson on her young, Black daughter, Ms. Ward decided to keep A.S. home from school until Ms. Ward was able to meet with District 97 administrators and staff.

34. On April 3, 2024, Julian Middle School Principal, William Lee, contacted Ms. Ward to gather additional information about Defendant Brown’s lesson, as he had not previously been informed about Defendant Brown’s intention to use cotton in her curriculum.

35. On April 5, 2024, Mr. Lee convened a meeting to discuss Defendant Brown’s use of cotton in her teaching and that Defendant Brown had given A.S. and another Black student

cotton to take home. Dr. Luis Fernando De León, Assistant Superintendent of Middle Schools; Dr. Natacia Campbell Tominov, District 97's convenient new hire who started in the role of Assistant Superintendent for Human Resources and Equity that same week; Ms. Echelon Jackson, Julian's Executive Coordinator for Building Management; and Defendant Brown were present for the meeting with Ms. Ward and A.S.

36. During the April 5, 2024, meeting, Mr. Lee stated that neither he nor the Social Sciences curriculum team approved use of cotton, a symbol of racial exploitation, in Defendant Brown's lesson.

37. Defendant Brown cried during the meeting, indicated that she did not think use of cotton during her lesson was a bad idea and that she did not believe it would cause harm.

38. Interestingly, Defendant Brown had taught the same subject and curriculum in previous years without use of cotton, giving the impression that she intentionally targeted A.S. and acted with complete disregard for the wellbeing of this young, Black student.

39. The meeting concluded without adequate resolution. While A.S. was removed from Defendant Brown's class – a major disruption to her class schedule just weeks before the end of the school year – there were no offers of support for A.S.'s mental health or wellbeing, and no efforts to course correct the harm done to A.S., the other Black student given cotton, and other Black students at Julian made aware of the lesson.

40. Upon information and belief, Defendant Brown was not disciplined for the racially charged and culturally insensitive lesson or the impact it had on A.S. and District 97 family and community members.

41. On the same date, Ms. Ward emailed numerous District 97 administrators and staff inquiring about why she had not yet received response to her request to meet with members of the District 97 Board of Education.

Defendant Amy Jefferson's Continued Racial Harassment and Retaliation Against Ms. Ward

42. In that same email, Ms. Ward also asked that Defendant District 97 stop Defendant Jefferson from using her sister, Lola Jefferson, to harass and retaliate against her. Ms. Ward noted that her employment status and "livelihood" had already been irreparably harmed because of Defendant Jefferson's previous discriminatory actions.

43. On April 8, 2024, Dr. Campbell Tominov, contacted Ms. Ward indicating that she would investigate the allegations surrounding Lola Jefferson.

44. Dr. Campbell Tominov later notified Ms. Ward that she had verified her report that Lola Jefferson contacted Ms. Ward's employer, falsely accused Ms. Ward of assaulting Defendant Jefferson, and threatened to report Ms. Ward to the IDFPR.

45. Upon information and belief, Defendant Jefferson was not disciplined for her involvement in retaliating against Ms. Ward.

46. On April 23, 2024, Ms. Ward met with Gavin Kearney, President of Defendant District 97 Board of Education; Dr. Shah, Mr. Robinson, and Dr. Campbell Tominov.

47. Again, Ms. Ward reported how she and her children had been subjected to racial discrimination and harassment at the hands of Defendants Jefferson and Brown, and other District 97 employees, including that she had improper restrictions placed on her relating to accessing District 97 buildings and events.

48. During the meeting, Mr. Robinson read from an apology letter Defendant Jefferson, who failed to attend the meeting, had written.

49. Mr. Kearney told Ms. Ward that he would investigate Ms. Ward's concerns and follow up with her. He has not had any contact with Ms. Ward since then.

Defendant Jason Morrell's Racially Motivated Aggression Toward A.S.

50. Very shortly after the meeting ended, Ms. Ward received a message from A.S. that she had been assaulted by Defendant Jason Morrell, a white male.

51. A.S. reported to Ms. Ward and District 97 administrators that while she was walking in the hallway between classes, Defendant Morrell aggressively approached her.

52. Stating that she felt uncomfortable with the way he was moving toward her, A.S. began backing away from Defendant Morrell who continued towards A.S. until she was nearly cornered.

53. In fear, particularly as she had just experienced direct discriminatory treatment by another white teacher and because Defendant Morrell is a male of greater size than A.S., she rushed past Defendant Morrell in an effort to get to safety.

54. Video surveillance shows the encounter the way A.S. described it with Defendant Morrell being the aggressor.

55. Nevertheless, A.S. was suspended and issued a fight ticket.

56. Upon information and belief, A.S. was issued a fight ticket only because Defendant Morrell falsely alleged that A.S. had assaulted him and he wanted to press charges against A.S., a thin, thirteen-year-old girl.

57. As a result of the ticket, A.S. sustained a \$500 fine.

58. Upon information and belief, Defendant Morrell was not disciplined for his aggression towards A.S. or his false accusations of assault.

59. Because of this, A.S. begged Ms. Ward to allow her to complete the school year with e-learning and/or allow her to be homeschooled.

60. A.S. did not and does not feel safe in her school.

Additional Racial Discrimination

61. In the days following Defendant Morrell's aggression towards A.S., Julian teachers began walking through the halls with their hands up. When asked why they were doing so, they stated, mockingly, that they didn't want to appear aggressive, intimidating or threatening as "some" claim them to be.

62. On or about May 14, 2024, Defendant Jefferson, aware that the years of discriminatory treatment against Ms. Ward, A.S. and S.G. could no longer be hidden, emailed Ms. Ward feigning interest in restoring relationship with Ms. Ward.

63. In her email, Defendant Jefferson stated, "I acknowledge the challenges we've faced in our interactions over the past months and years. It's clear to me that there have been moments of tension and misunderstanding." Defendant Jefferson went on to state that she had suddenly developed the interest to, "listen, support and work together".

64. In response to Ms. Ward's inquiry as to the purpose of the meeting, Defendant Jefferson replied that she was "well aware that the proposed restorative meeting will not resolve many of the issues that you've mentioned from previous years."

65. Defendant Jefferson's email was another effort to brush under the rug years of racial discrimination, harassment, and retaliation.

66. On or about May 23, 2024, A.S. learned from friends that another student (hereinafter, “Student 2”) said she wanted to fight A.S.

67. During second period, A.S. reported this information to Julian staff, who only told A.S. to try to stay away from Student 2.

68. Later that day, A.S. saw Student 2 in the hallway, who confirmed she indeed wanted to fight A.S. Feeling unsafe and unsupported in school, A.S. believed she needed to protect herself and a preventable fight ensued with Student 2.

69. As the altercation subsided, A.S. remained overwhelmed and told staff that she would jump over a railing.

70. Julian staff called the paramedics given A.S.’s previous indications of mental health concerns.

71. While A.S. later said she had no intent to harm herself in that moment and that there was no need for emergency personnel to be contacted, she also acknowledged having been embarrassed and humiliated that an ambulance was called and worried that this would be another incident Defendant District 97 would attempt to use against her family and her.

72. A.S. suffered and continues to suffer trauma resulting from years-long discriminatory and harassing treatment perpetrated against her family. A.S. again shared the impact of her experiences with Defendant District 97 Board of Education during the June 11, 2024, District 97 Board of Education meeting.

73. Sadly, Defendant District 97’s failures continue into the current school year. On Monday, August 26, 2024, just three days into the school year, A.S. was involved in another preventable altercation.

74. Early on August 26, 2024, and prior to the school day beginning, Ms. Ward notified numerous District 97 administrators and Julian staff that another student (hereinafter, “Student 3”) had been harassing A.S. over the weekend, and publicized that she intended to fight A.S.

75. Defendant District 97 did nothing to keep A.S. safe or prevent Student 3 from making good on her weekend threats.

76. Instead, the fight Student 3 had promised occurred just minutes into the school day.

77. Like before, A.S. was suspended because Defendant District 97 did not intervene or protect A.S.

78. Upon information and belief, Student 3 was not similarly disciplined.

79. Interestingly, Defendant Morrell arrived at the location of the fight and, though there was no need for him to interact with A.S., he approached her anyway.

80. When A.S. told Defendant Morrell that she did not want him to touch her, he replied, “You know exactly who the [F] I am,” and “I don’t give a [F] what you want.”

81. Defendant Morrell said these words to the same small, thirteen-year-old girl he claimed assaulted him in May 2024.

COUNT I
42 U.S.C. § 1983: VIOLATION OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964
AGAINST ALL DEFENDANTS

82. Plaintiff realleges and incorporates all preceding paragraphs as if set forth fully herein.

83. Title VI of the Civil Rights Act of 1964 provides, in relevant part, that “[n]o person in the United States shall, on the grounds of race, color, or national origin, be excluded

from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d.

84. Ms. Ward, A.S. and S.G. are African Americans and, thus, members of a protected class pursuant to Title VI.

85. Defendant District 97 is a recipient of Federal financial assistance.

86. At all relevant times, Defendants Brown, Jefferson, and Morrell were employed by Defendant District 97, operating in their official capacities as agents of Defendant District 97.

87. The actions of Defendants Brown, Jefferson and Morrell subjected Ms. Ward, A.S. and S.G. to discrimination and harassment based on race, and retaliation.

88. Defendant District 97 knew or should have known that the actions of Defendants Brown, Jefferson, and Morrell caused Ms. Ward, A.S. and S.G. to be subjected to racial discrimination, harassment and retaliation.

89. Defendant District 97 failed to take proactive steps to prevent such racial discrimination and harassment.

90. Defendant District 97 failed to take immediate steps to end such racial discrimination and harassment, prevent it from recurring, or remedy the harm caused to Ms. Ward, A.S. and S.G.

91. Defendant District 97 failed to prevent retaliation against Ms. Ward, A.S. and S.G. for reporting racial discrimination and harassment.

92. Ms. Ward, A.S. and S.G. suffered immense harm – including, but not limited to, mental, emotional, psychological, economic, and reputational – resulting from the discriminatory and harassing actions of Defendants Brown, Jefferson, and Morrell; and from Defendant District

97's failure to responsibly respond to known race discrimination, harassment and retaliation against Ms. Ward, A.S. and S.G.

COUNT II
28 U.S.C. § 1367: VIOLATION OF THE ILLINOIS CIVIL RIGHTS ACT OF 2003
AGAINST ALL DEFENDANTS

93. Plaintiff realleges and incorporates all preceding paragraphs as if set forth fully herein.

94. The Illinois Civil Rights Act of 2003 states, in relevant part, that “[n]o unit of State, county, or local government in Illinois shall: (1) exclude a person from participation in, deny a person the benefits of, or subject a person to discrimination under any program or activity on the grounds of that person’s race, color, national origin, or gender.” 740 ILCS 23/5(a)(1).

95. Ms. Ward, A.S. and S.G. are African Americans and, thus, members of a protected class pursuant to the Illinois Civil Rights Act of 2003.

96. At all relevant times, Defendant District 97 was and is a public education school district and governmental body operating in Illinois.

97. At all relevant times, Defendants Brown, Jefferson, and Morrell were employed by Defendant District 97, operating in their official capacities as agents of Defendant District 97.

98. At all relevant times Defendants Brown, Jefferson, and Morrell were acting under color of law.

99. The actions of Defendants Brown, Jefferson, and Morrell subjected Ms. Ward, A.S. and S.G. to discrimination and harassment based on race, and retaliation.

100. Defendant District 97 knew or should have known that the actions of Defendants Brown, Jefferson, and Morrell caused Ms. Ward, A.S. and S.G. to be subjected to racial discrimination, harassment and retaliation.

101. Defendant District 97 failed to take proactive steps to prevent such racial discrimination and harassment.

102. Defendant District 97 failed to take immediate steps to end such racial discrimination and harassment, prevent it from recurring, or remedy the harm caused to Ms. Ward, A.S. and S.G.

103. Defendant District 97 failed to prevent retaliation against Ms. Ward, A.S. and S.G. for reporting racial discrimination and harassment.

104. Ms. Ward, A.S. and S.G. suffered immense harm – including, but not limited to, mental, emotional, psychological, economic, and reputational – resulting from the discriminatory and harassing actions of Defendants Brown, Jefferson, and Morrell; and from Defendant District 97’s failure to responsibly respond to known race discrimination, harassment and retaliation against Ms. Ward, A.S. and S.G.

COUNT III
28 U.S.C. § 1367: VIOLATION OF THE ILLINOIS HUMAN RIGHTS ACT AS
AMENDED BY THE RACISM-FREE SCHOOLS LAW
AGAINST DEFENDANTS MORRELL AND DISTRICT 97

105. Plaintiff realleges and incorporates all preceding paragraphs as if set forth fully herein.

106. The Illinois Human Rights Act prohibits race discrimination and harassment in elementary schools, stating, in relevant part, that harassment is “any unwelcome conduct by an elementary, secondary or higher education representative toward a student on the basis of a student’s actual or perceived race . . . that has the purpose or effect of substantially interfering with a student’s educational performance or creating an intimidating, hostile, or offensive educational environment.” 775 ILCS 5/5A-101(F). It goes on to provide that it is a civil rights

violation for an elementary school representative “to commit or engage in harassment,” and for an elementary school “to fail to take appropriate corrective action to stop harassment if the institution knows that an elementary [school] representative was committing or engaging in or committed or engaged in harassment”. 775 ILCS 5/5A-102(C)-(D).

107. A.S. is African American and, thus, a member of a protected class pursuant to the Illinois Human Rights Act.

108. At all relevant times, Defendant Morrell was employed by Defendant District 97, operating in his official capacity as agent of Defendant District 97.

109. Defendant Morrell’s actions subjected A.S. to discrimination and harassment based on race, and retaliation.

110. Defendant District 97 knew or should have known that Defendant Morrell’s actions caused A.S. to be subjected to racial discrimination, harassment and retaliation.

111. Defendant District 97 failed to take proactive steps to prevent such racial discrimination and harassment.

112. Defendant District 97 failed to take immediate steps to end such racial discrimination and harassment, prevent it from recurring, or remedy harm caused to A.S.

113. Defendant Morrell’s actions and Defendant District 97’s failure to act created an intimidating, hostile, or offensive educational environment for A.S.

114. A.S. suffered immense harm – including, but not limited to, mental, emotional, psychological, economic, and reputational – resulting from the discriminatory and harassing actions of Defendant Morrell, and from Defendant District 97’s failure to responsibly respond to known race discrimination and harassment against A.S.

COUNT IV
28 U.S.C. § 1367: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
AGAINST ALL DEFENDANTS

115. Plaintiff realleges and incorporates all preceding paragraphs as if set forth fully herein.

116. At all relevant times, Defendants Brown, Jefferson, and Morrell were employed by Defendant District 97, operating in their official capacities as agents of Defendant District 97.

117. The actions of Defendants Brown, Jefferson, and Morrell were extreme and outrageous such that Ms. Ward, A.S. and S.G. suffered immense emotional distress and harm.

118. Defendants Brown, Jefferson, and Morrell acted with intent to cause emotional distress, or with reckless disregard for the likelihood that their actions would cause emotional distress for Ms. Ward, A.S. and S.G.

119. Defendant District 97's failure to take proactive steps to prevent such racial discrimination and harassment against Ms. Ward, A.S. and S.G. was both extreme and outrageous, and caused immense emotional distress for and harm to Ms. Ward, A.S. and S.G.

120. Defendant District 97's failure to take immediate steps to end such racial discrimination and harassment, prevent it from recurring, or remedy the harm caused to Ms. Ward, A.S. and S.G., was both extreme and outrageous leading to additional and immense emotional distress for Ms. Ward, A.S. and S.G.

121. Defendant District 97's failure to prevent retaliation against Ms. Ward, A.S. and S.G. for reporting racial discrimination and harassment was both extreme and outrageous leading to additional and immense emotional distress for Ms. Ward, A.S. and S.G.

CONCLUSION

WHEREFORE, Plaintiff, CANDACE WARD, as next of friend and on behalf of her minor daughters, A.S. and S.G., respectfully requests that this Honorable Court enter judgment in her favor and against the Defendants, OAK PARK ELEMENTARY SCHOOL DISTRICT 97 BOARD OF EDUCATION, LAUREN BROWN, AMY JEFFERSON, and JASON MORRELL, granting the following relief:

- A. Actual damages;
- B. Compensatory damages;
- C. Punitive damages;
- D. Costs;
- E. Attorney's fees; and
- F. Such other relief as this Honorable Court deems just and equitable, or to which Plaintiff, as next of friend and on behalf of her minor daughters, is entitled as a matter of law.

Respectfully submitted,

JEM Law Advocates, P.C.

By: /s/ TiShaunda McPherson
TiShaunda McPherson

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