

**IN THE FIFTEENTH JUDICIAL CIRCUIT
CARROLL COUNTY, ILLINOIS**

THE PEOPLE OF THE STATE OF ILLINOIS,
ex rel. KWAME RAOUL, Attorney General
of Illinois,

Plaintiff,

v.

CHERYL HAMPTON and
CHAD HAMPTON,

Defendants.

Case No. **2022LA4**

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, the People of the State of Illinois, by and through their attorney, Kwame Raoul, Attorney General of Illinois, brings this civil action for violations of the Illinois Hate Crime Statute, 720 ILCS 5/12-7.1, against Defendants Cheryl Hampton and Chad Hampton (collectively, the “Hamptons” or “Defendants”). In support of this complaint, Plaintiff states as follows:

NATURE OF PLAINTIFF’S CLAIMS

1. Cheryl Hampton and her adult son Chad Hampton, both of whom are white, committed a hate crime against their Black next-door neighbor, Gregory Johnson (“Johnson”), by lynching an effigy of Johnson in a tree in plain view of Johnson’s home in order to intimidate him.

2. The life-size effigy resembled Johnson by design. The head consisted of a mask intentionally painted black and a curly wig altered to resemble Johnson’s hair. The stuffed clothing used for the body resembled Johnson’s clothing. A noose made of rope hung the effigy by the neck from a tree a few feet from Johnson’s property. A large chain bound the effigy’s hands and torso. To further terrorize and intimidate Johnson, in one of their windows facing Johnson’s home, the

Hamptons displayed the word “NIGGER” (hereafter, “n****r” or the “n-word”) in black marker on the glass with a Confederate flag draped behind the slur.

3. The Hamptons took these actions for a specific, illegal purpose: to intimidate Johnson into silence. Prior to the appearance of the lynched effigy in October 2020, Johnson had repeatedly contacted the local police department in Savanna, Illinois, about the Hamptons’ aggressive conduct toward him. A few months prior, in July 2020, Johnson notified the police about damage to a fence on his property after Cheryl Hampton told him she would tear the fence down. Johnson again contacted the Savanna police after witnessing Chad Hampton purposefully spray weed killer on large portions of Johnson’s lawn, damaging the grass. After being charged with a misdemeanor for damaging Johnson’s property, Chad Hampton spray-painted large, black swastikas on a garage facing Johnson’s property in September 2020. The Savanna police again visited the Hampton residence to ask Chad Hampton to remove the swastikas. Less than a month later, on October 19, 2020, Chad Hampton was arraigned on his misdemeanor charge. Within a week of the arraignment, the lynched effigy of Johnson appeared hanging from a tree next to Johnson’s property.

4. When the Savanna police visited the Hamptons’ residence about the effigy, Cheryl Hampton openly admitted that the display targeted Johnson. When a responding police officer asked Cheryl Hampton why she hung the figure, she responded that she was tired of Johnson complaining about everything she and her son did. Even after authorities asked Cheryl Hampton to move the lynched effigy out of view of Johnson’s home, or at least to change its appearance, she refused. After consulting with the Carroll County State’s Attorney, the police arrested Cheryl Hampton for intimidation of a witness, a felony. The police took custody of the effigy as evidence. A few days later, on November 1, 2020, Chad Hampton called the Savanna Police Department

seeking to file an official complaint for damage to his property because the police had cut down the lynched effigy.

5. The Hamptons created and hung the effigy as a threat of racial violence against Johnson, because he contacted law enforcement about the Hamptons. The Hamptons intentionally invoked the long, vicious legacy of lynched Black men in America to terrorize Johnson because he is a Black man. The Hamptons intended for this threat of racial violence to stop Johnson from reporting their conduct to law enforcement and assisting in the prosecution of Chad Hampton's criminal case. The Hamptons' conduct violates multiple provisions of the Illinois Criminal Code, including intimidation, 720 ILCS 5/12-6(a)(1), and disorderly conduct, 720 ILCS 5/26-1, both of which are predicate offenses under the Illinois Hate Crime Statute, 720 ILCS 5/12-7.1. Because the Hamptons committed these predicate offenses based in part on Johnson's race, they committed hate crimes under Illinois law, 720 ILCS 5/12-7.1.

6. A 2018 amendment to the Illinois Hate Crime Statute authorizes the Attorney General to bring a civil action on behalf of the People of Illinois for specified hate crime offenses independent of any criminal prosecution. 720 ILCS 5/12-7.1(c). In the name of the People of Illinois, the Attorney General brings this civil action against Cheryl Hampton and Chad Hampton for equitable relief, civil penalties, and other appropriate relief as provided in 720 ILCS 5/12-7.1(c).

PARTIES

7. The Attorney General enforces laws protecting civil rights and prohibiting race discrimination. 15 ILCS 210/1. The Attorney General enforces the public policy of the State of Illinois to secure for all its residents the freedom from discrimination against any individual because of their race. 775 ILCS 5/1-102(A). Illinois law authorizes the Attorney General to "bring

a civil action in the name of the People of the State” for an injunction, civil penalties, and other equitable relief for specified violations of the Illinois Hate Crimes Statute, 720 ILCS 5/12-7.1(c). The Attorney General brings this civil action on behalf of the People of Illinois as Plaintiff. The Attorney General brings this action after consultation with the Carroll County State’s Attorney. *Id.*

8. At all times relevant to this complaint, Defendant Cheryl Hampton was a resident of Savanna, Illinois, located in Carroll County. At all times relevant to this complaint, Cheryl Hampton was Johnson’s next-door neighbor in Savanna. Upon information and belief, Cheryl Hampton is no longer Johnson’s next-door neighbor, though she remains a resident of Illinois.

9. At all times relevant to this complaint, Defendant Chad Hampton was a resident of Savanna, Illinois. At all times relevant to this complaint, Chad Hampton was Johnson’s next-door neighbor in Savanna. Upon information and belief, Chad Hampton is no longer Johnson’s next-door neighbor, though he remains a resident of Illinois.

JURISDICTION AND VENUE

10. The Attorney General of Illinois brings this action under 720 ILCS 5/12-7.1(c).

11. Venue is proper in the Fifteenth Judicial Circuit because the events giving rise to the causes of action occurred in Savanna, Illinois.

FACTUAL ALLEGATIONS

12. At all times relevant to this complaint, Cheryl Hampton and her adult son, Chad Hampton, lived in Savanna, Illinois. The Hamptons rented and resided in a single-family home with a yard in Savanna (“Hampton Rental Property”).

13. The Hamptons are white.

14. At all times relevant to this complaint, Gregory Johnson lived next door to the Hamptons in a single-family home (“Johnson Property”) in Savanna. Johnson owns the Johnson Property, which consists of his residence and the underlying residential lot on which it rests.

15. Johnson is Black.

16. In approximately July 2020, Johnson noticed damage to his lawn, which he believed was caused by someone using a riding mower to cross over the property line from the Hampton Rental Property. After noticing the damage, Johnson erected an orange retractable fence on his property to prevent a lawn mower from crossing from the Hampton Rental Property onto his property.

17. On or about July 11, 2020, Cheryl Hampton told Johnson to remove the fence. Johnson declined to do so. Johnson told Cheryl Hampton to have the owner of the Hampton Rental Property contact him regarding any concerns about property-line issues. Cheryl Hampton told Johnson that she would tear the fence down.

18. The next day, on July 12, 2020, Johnson noticed his fence was cut in half. Johnson called the Savanna Police Department to file a police report.

19. Savanna Police Lieutenant Daniel Nevills responded to the call and spoke to Cheryl Hampton. On or around this time, Cheryl Hampton told Lt. Nevills in reference to her dispute with Johnson that she did not want “n****rs” living next to her.

20. The intimidating and threatening nature of the epithet used by Cheryl Hampton, and the terrorizing impact it can have given its historical context, are well recognized. *See, e.g., Virginia v. Black*, 538 U.S. 343, 355 (2003) (describing how the Ku Klux Klan burned crosses in front of a proposed housing project while declaring “we are here to keep [n-words] out of your town”); *Robinson v. Perales*, 894 F.3d 818, 828 (7th Cir. 2018) (noting that “in light of its

threatening use throughout American history, this particular epithet can have a highly disturbing impact on the listener”).

21. During the conversation between Lt. Nevills and Cheryl Hampton on July 12, 2020, Chad Hampton walked to the front of the Hampton Rental Property and raised a Confederate flag on the flagpole in front of the Hamptons’ house.

22. Upon information and belief, Chad Hampton displayed the Confederate flag in view of Johnson’s home because of the Confederate flag’s historical and present-day association with white supremacist ideology and beliefs.

23. That same day, after Lt. Nevills left, Johnson witnessed Chad Hampton spraying Johnson’s lawn with weed killer, damaging the grass. Johnson called the Savanna police a second time. Johnson also took photographs of Chad Hampton spraying the lawn. Johnson subsequently noticed that the weed killer destroyed the grass on an extended strip of his lawn along the fence next to the Hampton Rental Property.

24. In or about July 2020, Johnson hired a company to survey the property where his lawn had been damaged by Chad Hampton spraying weed killer. Johnson commissioned the survey in order to demonstrate that the fence and the damaged portion of the lawn were part of the Johnson Property, not the Hampton Rental Property.

25. On or about August 30, 2020, Johnson contacted the Savanna police to report that his retractable fence had again been pulled up and damaged.

26. On September 22, 2020, the Carroll County Sheriff issued a summons against Chad Hampton for a misdemeanor charge of criminal damage to property, 720 ILCS 5/21-1, for his prior spraying of weed killer on Johnson’s lawn. Johnson was listed as the complaining witness.

27. On or about September 23, 2020, Chad Hampton spray-painted large swastikas with black paint on the garage of the Hampton Rental Property. The swastikas were in direct view of Johnson's home. Johnson was upset by the swastikas. Johnson took photographs of the swastikas and notified the Savanna police.

28. Upon information and belief, Chad Hampton displayed the swastikas in view of Johnson's property because of the swastika's historical and present-day association with white supremacist ideology and beliefs.

29. On October 19, 2020, Chad Hampton appeared at a court hearing for his arraignment on the misdemeanor charge of criminal damage to property stemming from his spraying of weed killer on Johnson's lawn.

30. Within a week of Chad Hampton's arraignment, Johnson first observed what he described to the Savanna police as a black "dummy" hanging by a noose from a tree on the Hampton Rental Property. Johnson understood the hanging figure to be an effort by the Hamptons to intimidate him.

31. On the morning of Monday, October 26, 2020, Johnson went to the Savanna Police Department to report the hanging figure on the Hampton Rental Property. Johnson met with Lt. Nevills. Johnson stated to Lt. Nevills that the Hamptons should be arrested and charged with hate crimes.

32. Later that day, October 26, 2020, Lt. Nevills went to observe the Hampton Rental Property from the adjacent road. Lt. Nevills observed the "dummy" in a tree between the Hamptons' house and Johnson's house. The "dummy" was hanging by the neck from a rope fashioned into a noose. Lt. Nevills took photographs of the "dummy". The photographs taken by Lt. Nevills are attached to this complaint as Group Exhibit 1.

33. The hanging figure photographed by Lt. Nevills had a white rubber mask that had been painted black—similar to Johnson’s skin color.

34. The hanging figure photographed by Lt. Nevills had a curly wig on its head. Then, as now, Johnson has curly hair. According to Lt. Nevills, the wig had black hair that appeared to have been spray-painted in parts with white spray-paint. Then, as now, Johnson has “salt-and-pepper” hair—a mixture of black, white, and gray.

35. The body of the hanging figure photographed by Lt. Nevills had two arms and two legs made of clothing stuffed with other material. The legs consisted of stuffed jeans. The torso and arms consisted of a stuffed beige zip-up jacket. Then, as now, Johnson is known to wear similar clothing.

36. The body of the hanging figure photographed by Lt. Nevills had a large chain wrapped around the hands, over the shoulders, and behind the neck.

37. After observing the hanging figure, Lt. Nevills went to the Hamptons’ door to try to speak with them. No one answered.

38. Seeing the hanging figure caused Johnson great distress. He interpreted the figure as a threat on his life and his personal safety.

39. Over the course of October 26, 2020, Savanna officials, including the Mayor of Savanna, Chris Lain (“Mayor Lain”), received multiple complaints about the hanging figure on the Hampton Rental Property. According to Lt. Nevills, reports of the hanging figure had “blown up” on social media, including, specifically, Facebook.

40. In the afternoon of October 26, 2020, Savanna Police Officer Cory Drowns spoke with Cheryl Hampton at her house about the hanging figure. Cheryl Hampton told Officer Drowns that she had hung it herself in the tree on the Hampton Rental Property. Officer Drowns also asked

Hampton about a Confederate flag that had been displayed on the Hampton Rental Property. Cheryl Hampton told Officer Drowns that the flag was hers and that she had owned it for years. Cheryl Hampton also told Officer Drowns that she would file a harassment suit against Johnson if his complaints continued.

41. On or about the afternoon of October 27, 2020, Lt. Nevills and Mayor Lain went to the Hamptons' residence to speak with them about the hanging figure. As Lt. Nevills approached the house, he observed the hanging figure in the same location where he had photographed it the previous day.

42. At that time, Lt. Nevills also observed that a window in the Hamptons' house that faced Johnson's house displayed a Confederate flag draped across it. On the glass of the same window, Lt. Nevills observed the word "n****r" written in large black letters. Lt. Nevills took photographs of this window display, which are attached to this complaint as Group Exhibit 2.

43. Lt. Nevills and Mayor Lain knocked on the Hamptons' front door. Cheryl Hampton answered the door.

44. Mayor Lain asked Cheryl Hampton why the figure was hanging from the tree. Cheryl Hampton responded that she was tired of Johnson complaining about everything she and her son do.

45. Lt. Nevills told Cheryl Hampton that the hanging figure was in poor taste at the very least and looked to be a racist symbol. Cheryl Hampton claimed the hanging figure was a Halloween decoration.

46. Lt. Nevills asked whether Cheryl Hampton would move the hanging figure to the other side of the property, so that the Black man living next door would not have to see it every day. Cheryl Hampton refused this request.

47. Lt. Nevills offered to get white paint to re-paint the figure's face and a different wig. Cheryl Hampton refused this offer.

48. Cheryl Hampton told Lt. Nevills that she hung the figure in the tree herself. Cheryl Hampton told Lt. Nevills that she was mad that her son, Chad Hampton, had had to take off of work for his court case involving Johnson.

49. Mayor Lain again asked Cheryl Hampton to take down the hanging figure. She refused.

50. Lt. Nevills informed Cheryl Hampton that he intended to consult with the Carroll County State's Attorney's Office about potential charges and that he would likely return. Lt. Nevills and Mayor Lain departed from the Hamptons' residence.

51. Later that day, October 27, 2020, after consulting with the Carroll County State's Attorney's Office, Lt. Nevills returned to the Hamptons' residence with Savanna Police Officer Dustin Lawson. Lt. Nevills and Officer Lawson arrested Cheryl Hampton for harassment of a witness, 720 ILCS 5/32-4(a), a class 2 felony under Illinois law.

52. On or about October 27, 2020, Officer Lawson and Lt. Nevills cut down the hanging figure from the tree on the Hampton Rental Property. Officer Lawson and Lt. Nevills took custody of the figure as evidence of the criminal charge against Cheryl Hampton. The size and weight of the figure required two adults to work together to safely take it down. Based on the size, weight, and location where the figure had been hung, Lt. Nevills believed that Cheryl Hampton could not have hung it by herself. At that time, Cheryl Hampton was approximately 5'2" tall and 65 years old.

53. On November 1, 2020, Chad Hampton contacted the Savanna Police Department. Chad Hampton indicated that he wanted to file a complaint against Lt. Nevills for property damage because Lt. Nevills had cut down the hanging figure from the tree outside his home.

54. As of the date of this complaint, Chad Hampton has not been criminally charged in conjunction with the hanging figure. His misdemeanor charge for criminal damage to property remains pending.

55. As of the date of this complaint, Cheryl Hampton's felony charge for witness intimidation remains pending.

56. By using a noose to hang a human-like figure with a face painted black to resemble Johnson's skin, a curly wig painted to resemble Johnson's hair, clothes resembling Johnson's, and chains binding the figure's wrists, the Hamptons made a threat of racial violence against Johnson. The Hamptons hung this effigy in a location where they knew Johnson would see it. Even after being asked to remove the effigy, change its appearance, or change its location, Cheryl Hampton refused. Later, after police took custody of the effigy as evidence, Chad Hampton objected to its removal.

57. The Hamptons used a noose to hang the effigy for a specific reason: to evoke the historical legacy of racially-motivated lynching of Black men in the United States.

58. The Hamptons chose to bind the hands and neck of the effigy with chains for a specific reason: to evoke the historical enslavement of Black people in the United States.

59. The Hamptons chose to lynch a chained effigy of Johnson because they intended to intimidate him based on his race. In doing so, the Hamptons perpetrated a hate crime against Johnson for which they may be held liable in this civil action.

COUNT I
**Cheryl Hampton's Commission of a Hate Crime by Intimidation
in Violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1)**

60. The People of the State of Illinois, through the Attorney General restate and re-allege Paragraphs 1 through 59 of this Complaint as though fully set forth herein.

61. Through the actions alleged in this complaint, Cheryl Hampton engaged in intimidation in violation of 720 ILCS 5/12-6(a)(1).

62. Through the actions alleged in this complaint, Cheryl Hampton communicated threats of physical harm to Gregory Johnson with the intent to cause Johnson to perform or to omit performance of an act. Specifically, Cheryl Hampton intended to cause Johnson to stop: communicating with law enforcement regarding her conduct and the conduct of her son, Chad Hampton; and assisting with the prosecution of Chad Hampton for criminal damage to Johnson's property. Cheryl Hampton had no lawful authority at any relevant time to inflict physical harm on Johnson.

63. Under the Illinois Hate Crimes Statute, 720 ILCS 5/12-7.1(a), a person commits a hate crime when, by reason of the actual or perceived race or color of another individual and regardless of the existence of any other motivating factor or factors, he or she commits intimidation as defined in paragraph (a)(1) of Section 12-6 of the Criminal Code. 720 ILCS 5/12-7.1(a); 720 ILCS 5/12-6(a)(1).

64. Through the actions alleged in this complaint, Cheryl Hampton committed intimidation in violation of 720 ILCS 5/12-6(a)(1) against Gregory Johnson by reason of Johnson's race, in further violation of 720 ILCS 5/12-7.1(a).

WHEREFORE, the People of the State of Illinois, through the Attorney General, request that this Court enter judgment in their favor and against Cheryl Hampton on this Count I and enter an order:

Declaratory Relief

- A. Declaring that Cheryl Hampton violated the Illinois Hate Crime Statute by engaging in intimidation against Gregory Johnson based in part on Johnson's race in violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1);

Injunctive Relief

- B. Enjoining Cheryl Hampton from engaging in conduct toward Gregory Johnson that constitutes a hate crime, discrimination based on race, or unlawful intimidation or harassment, and from assisting or abetting any other individual engaging in such unlawful conduct;
- C. Enjoining Cheryl Hampton from engaging in conduct toward any person that violates 720 ILCS 5/12-7.1(a);
- D. Enjoining Cheryl Hampton from having any contact, including nonphysical contact and electronic communication as defined in Section 26.5-0.1 of the Illinois Criminal Code, with Gregory Johnson, whether directly, indirectly, or through third parties, regardless of whether those third parties know of the Court's order;
- E. Requiring Cheryl Hampton to stay away from the Johnson Property and any other property owned, possessed, leased, kept, or held by Johnson, and forbidding Cheryl Hampton from damaging or assisting any third party in damaging any such property;

Civil Penalties

- F. Requiring Cheryl Hampton to pay a civil penalty of \$25,000 for each violation of 720 ILCS 5/12-7.1(a); and
- G. Ordering such other relief that the Court deems just and appropriate.

COUNT II

**Chad Hampton's Commission of a Hate Crime by Intimidation
in Violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1)**

65. The People of the State of Illinois, through the Attorney General, restate and re-allege Paragraphs 1 through 64 of this Complaint as though fully set forth herein.

66. Through the actions alleged in this complaint, Chad Hampton engaged in intimidation in violation of 720 ILCS 5/12-6(a)(1).

67. Through the actions alleged in this complaint, Chad Hampton communicated threats of physical harm to Gregory Johnson with the intent to cause Johnson to perform or to omit performance of an act. Specifically, Chad Hampton intended to cause Johnson to stop: communicating with law enforcement regarding his conduct and the conduct of his mother, Cheryl Hampton; and assisting with his prosecution for criminal damage to Johnson's property. Chad Hampton had no lawful authority at any relevant time to inflict physical harm on Johnson.

68. Under the Illinois Hate Crimes Statute, 720 ILCS 5/12-7.1(a), a person commits a hate crime when, by reason of the actual or perceived race or color of another individual and regardless of the existence of any other motivating factor or factors, he or she commits intimidation as defined in paragraph (a)(1) of Section 12-6 of the Criminal Code. 720 ILCS 5/12-7.1(a).

69. Through the actions alleged in this complaint, Chad Hampton committed intimidation in violation of 720 ILCS 5/12-6(a)(1) against Gregory Johnson by reason of Johnson's race, in further violation of 720 ILCS 5/12-7.1(a).

WHEREFORE, the People of the State of Illinois, through the Attorney General, request that this Court enter judgment in their favor and against Chad Hampton on this Count II and enter an order:

Declaratory Relief

- A. Declaring that Chad Hampton violated the Illinois Hate Crime Statute by engaging in intimidation against Gregory Johnson based in part on Johnson's race in violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1);

Injunctive Relief

- B. Enjoining Chad Hampton from engaging in conduct toward Gregory Johnson that constitutes a hate crime, discrimination based on race, or unlawful intimidation or harassment, and from assisting or abetting any other individual engaging in such unlawful conduct;
- C. Enjoining Chad Hampton from engaging in conduct toward any person that violates 720 ILCS 5/12-7.1(a);
- D. Enjoining Chad Hampton from having any contact, including nonphysical contact and electronic communication as defined in Section 26.5-0.1 of the Illinois Criminal Code, with Gregory Johnson, whether directly, indirectly, or through third parties, regardless of whether those third parties know of the Court's order;
- E. Requiring Chad Hampton to stay away from the Johnson Property and any other property owned, possessed, leased, kept, or held by Johnson, and forbidding Chad Hampton from damaging or assisting any third party in damaging any such property;

Civil Penalties

- F. Requiring Chad Hampton to pay a civil penalty of \$25,000 for each violation of 720 ILCS 5/12-7.1(a); and
- G. Ordering such other relief that the Court deems just and appropriate.

COUNT III

**Cheryl Hampton's Commission of a Hate Crime by Disorderly Conduct
in Violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/26-1**

70. The People of the State of Illinois, through the Attorney General restate and re-allege Paragraphs 1 through 69 of this Complaint as though fully set forth herein.

71. Through the actions alleged in this complaint, Cheryl Hampton engaged in disorderly conduct in violation of 720 ILCS 5/26-1.

72. Through the actions alleged in this complaint, Cheryl Hampton communicated threats of physical harm and racial slurs to Gregory Johnson in such unreasonable manner as to alarm or disturb Johnson and to provoke a breach of the peace.

73. Under the Illinois Hate Crimes Statute, 720 ILCS 5/12-7.1(a), a person commits a hate crime when, by reason of the actual or perceived race or color of another individual and regardless of the existence of any other motivating factor or factors, he or she commits disorderly conduct as defined in 720 ILCS 5/26-1.

74. Through the actions alleged in this complaint, Cheryl Hampton committed disorderly conduct in violation of 720 ILCS 5/26-1 against Gregory Johnson by reason of Johnson's race, in further violation of 720 ILCS 5/12-7.1(a).

WHEREFORE, the People of the State of Illinois, through the Attorney General, request that this Court enter judgment in their favor and against Cheryl Hampton on this Count III and enter an order:

Declaratory Relief

- A. Declaring that Cheryl Hampton violated the Illinois Hate Crime Statute by engaging in disorderly conduct against Gregory Johnson based in part on Johnson's race in violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1);

Injunctive Relief

- B. Enjoining Cheryl Hampton from engaging in conduct toward Gregory Johnson that constitutes a hate crime, discrimination based on race, or unlawful intimidation or harassment, and from assisting or abetting any other individual engaging in such unlawful conduct;
- C. Enjoining Cheryl Hampton from engaging in conduct toward any person that violates 720 ILCS 5/12-7.1(a);
- D. Enjoining Cheryl Hampton from having any contact, including nonphysical contact and electronic communication as defined in Section 26.5-0.1 of the Illinois Criminal Code, with Gregory Johnson, whether directly, indirectly, or through third parties, regardless of whether those third parties know of the Court's order;
- E. Requiring Cheryl Hampton to stay away from the Johnson Property and any other property owned, possessed, leased, kept, or held by Johnson, and forbidding Cheryl Hampton from damaging or assisting any third party in damaging any such property;

Civil Penalties

- F. Requiring Cheryl Hampton to pay a civil penalty of \$25,000 for each violation of 720 ILCS 5/12-7.1(a); and
- G. Ordering such other relief that the Court deems just and appropriate.

COUNT IV
**Chad Hampton's Commission of a Hate Crime by Disorderly Conduct
in Violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1)**

75. The People of the State of Illinois, through the Attorney General, restate and re-allege Paragraphs 1 through 74 of this Complaint as though fully set forth herein.

76. Through the actions alleged in this complaint, Chad Hampton engaged in disorderly conduct in violation of 720 ILCS 5/26-1.

77. Through the actions alleged in this complaint, Chad Hampton communicated threats of physical harm and racial slurs to Gregory Johnson in such unreasonable manner as to alarm or disturb Johnson and to provoke a breach of the peace.

78. Under the Illinois Hate Crimes Statute, 720 ILCS 5/12-7.1(a), a person commits a hate crime when, by reason of the actual or perceived race or color of another individual and regardless of the existence of any other motivating factor or factors, he or she commits disorderly conduct as defined in 720 ILCS 5/26-1.

79. Through the actions alleged in this complaint, Chad Hampton committed disorderly conduct in violation of 720 ILCS 5/26-1 against Gregory Johnson by reason of Johnson's race, in further violation of 720 ILCS 5/12-7.1(a).

WHEREFORE, the People of the State of Illinois, through the Attorney General, request that this Court enter judgment in their favor and against Chad Hampton on this Count IV and enter an order:

Declaratory Relief

- A. Declaring that Chad Hampton violated the Illinois Hate Crime Statute by engaging in disorderly conduct against Gregory Johnson based in part on Johnson's race in violation of 720 ILCS 5/12-7.1(a) & 720 ILCS 5/12-6(a)(1);

Injunctive Relief

- B. Enjoining Chad Hampton from engaging in conduct toward Gregory Johnson that constitutes a hate crime, discrimination based on race, or unlawful intimidation or harassment, and from assisting or abetting any other individual engaging in such unlawful conduct;
- C. Enjoining Chad Hampton from engaging in conduct toward any person that violates 720 ILCS 5/12-7.1(a);
- D. Enjoining Chad Hampton from having any contact, including nonphysical contact and electronic communication as defined in Section 26.5-0.1 of the Illinois Criminal Code, with Gregory Johnson, whether directly, indirectly, or through third parties, regardless of whether those third parties know of the order;
- E. Requiring Chad Hampton to stay away from the Johnson Property and any other property owned, possessed, leased, kept, or held by Johnson, and forbidding Chad Hampton from damaging or assisting any third party in damaging any such property;

Civil Penalties

- F. Requiring Chad Hampton to pay a civil penalty of \$25,000 for each violation of 720 ILCS 5/12-7.1(a); and
- G. Ordering such other relief that the Court deems just and appropriate.

THE PEOPLE OF THE STATE OF
ILLINOIS, *ex rel.* KWAME RAOUL,
Attorney General of Illinois

Dated: March 31, 2022

By: /s/ Alison V. Hill
Alison V. Hill
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THIS CASE IS SET FOR PROGRESS CALL
BEFORE JUDGE ^{Kane}
ON ^{Thursday} ^{1st} DAY OF
September ²² 20
ALL PARTIES OR THEIR COUNSEL ARE TO BE
PRESENT BEFORE THE COURT AT THIS PROGRESS
CALL AT ^{9:30a} M FAILURE TO
APPEAR MAY RESULT IN DISMISSAL OR
DEFAULT.
CLERK OF THE CIRCUIT COURT

GROUP EXHIBIT 1









GROUP EXHIBIT 2

