

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

PATRICIA BLAGOJEVICH,)
)
Plaintiff,)
)
v.)
)
RICHARD ROBERTS a/k/a RICK)
ROBERTS,)
)
Defendant.)

No. 2009L011617
CALENDAR/ROOM
Jury Trial Demanded
TIME 00:00
LIB 1/ST

DOROTHY BROWN
 CLERK OF CIRCUIT COURT
 LAW DIVISION
 2009 OCT -1 AM 9:21

FILED-4

COMPLAINT FOR DEFAMATION

Plaintiff Patricia Blagojevich (“Plaintiff”) brings this Complaint against Defendant Richard Roberts a/k/a Rick Roberts (“Roberts” or “Defendant”) to redress injuries suffered by her as a result of Defendant’s defamatory and malicious statements about Plaintiff. For her Complaint, Plaintiff alleges as follows upon personal knowledge as to herself and her own acts and experiences, and, as to all other matters, upon information and belief.

NATURE OF THE ACTION

1. Perhaps to deflect attention from his performance as Senior Director of Strategy and Communications for the Chicago Christian Industrial League (“CCIL”), or at the very least, generate publicity for himself and CCIL, Defendant Roberts charted a particularly distasteful course: defaming the former First Lady of the State of Illinois, Plaintiff Patricia Blagojevich.
2. To that end, Roberts has falsely accused the former First Lady of stealing CCIL’s donor list—something Roberts claims is proprietary—upon her termination from CCIL.
3. By making these false accusations publicly, Roberts has caused great injury to Plaintiff’s reputation and her standing in the community.

4. To redress these injuries, Plaintiff brings this suit and seeks, among other things, compensatory and punitive damages, as well as an injunction requiring Roberts to publicly retract his defamatory statements and issue an apology to the former First Lady.

BACKGROUND

5. In or around September, 2008 Plaintiff commenced her employment with CCIL, a charitable organization, and was given the title of Director of Development. As part of her job responsibilities, Plaintiff was charged with reaching out to potential donors and soliciting charitable contributions for CCIL.

6. As soon as she began her employment, Plaintiff realized, much to her surprise, that CCIL did not maintain an *email* list of donors and other persons for purposes of outreach on behalf of CCIL. Plaintiff therefore created her own email list of potential donors that, for the most part, consisted of her friends, family members, former colleagues and business partners, acquaintances, and other persons with whom Plaintiff has been in contact over the course of her professional life. Plaintiff imported her email contacts of these persons into the "Outlook Contacts" on her work computer, and used them to solicit contributions for the League and for other purposes within the scope of her employment.

7. In or about January of 2009, CCIL terminated Plaintiff's employment. Upon information and belief, Roberts was hired by CCIL a month later. On further information and belief, as a precondition of Roberts accepting employment with CCIL, CCIL was required to terminate the former First Lady.

PARTIES

8. Plaintiff Patricia Blagojevich is a natural person and citizen of Cook County, Illinois.

9. Defendant Richard Roberts is a natural person and on information and belief a citizen of Cook County, Illinois.

VENUE

10. Venue is proper in Cook County because the acts that give rise to this action occurred in Cook County, Illinois, and the injury suffered by Plaintiff occurred in Cook County, Illinois.

CONDUCT COMPLAINED OF

11. There is no easier way to attract media attention and generate free publicity than to make false accusations against a person whose life is the focus of a constant public attention and scrutiny.

12. This is especially true with respect to Plaintiff and her husband, the former Governor of Illinois, Rod Blagojevich.

13. This time, however, Roberts went too far in his attempt to promote himself and CCIL.

14. On or about September 16, 2009, Roberts stated to *Chicago Sun-Times* (“Sun-Times”) columnist Michael Sneed that Plaintiff had stolen and utilized CCIL’s donor list—something Roberts claimed is proprietary—to promote the release of her husband, former Illinois Governor Rod Blagojevich’s new book. True and accurate copies of the articles published in the *Chicago Tribune* on September 17, 2009, and the *Chicago Sun-Times* on September 18, 2009, are collectively attached hereto as Group Exhibit A. *The Chicago Tribune* also ran the story and, following that article, numerous radio and television outlets picked up the story. See Exhibit A.

15. By this defamatory statement, Roberts intended to charge, and did charge, Plaintiff with having stolen property of CCIL—its purported donor list—and unlawfully using such list for her own pecuniary gain.

16. Such defamatory statement was intended to convey, and did convey, to the public, the impression that Plaintiff was accused of having broken the law, and was so understood by the recipients of the publication. The defamatory statement was also calculated to, and did, subject Plaintiff to public scorn, hatred, and ridicule.

17. This defamatory statement was, and is, maliciously false and untrue, and at the time made, were either known to Roberts to be false and untrue or, in the alternative, Roberts acted with reckless disregard for its truth or falsity.

18. On or about September 18, 2009, a former CCIL's executive stated to a Sun-Times reporter that "[i]t was Patti's list that she brought with her. There was never any contact list to begin with." See Exhibit A.

19. Prior to Roberts' defamatory statements, Plaintiff has never been accused of, or charged with, any crime whatsoever including theft of any kind, and has enjoyed the reputation of being a law-abiding citizen throughout her life.

20. As a direct and proximate result of the publication of the above defamatory statements by Roberts, Plaintiff has suffered, and continues to suffer, damages including, but not limited to, damage to her reputation and her standing in the community.

WHEREFORE, Plaintiff Patricia Blagojevich, prays for the following relief:

- a. An award of compensatory damages;
- b. An award of punitive damages;
- c. An injunction enjoining Defendant Roberts from making any further false statements about Plaintiff and requiring Defendant Roberts to publicly retract his

defamatory statements and apologize for making such defamatory statements in the form of a publication in the *Chicago Sun-Times*; and

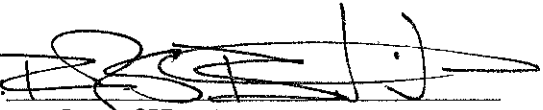
- d. Such other and further relief as the Court deems equitable and just.

JURY DEMAND

Plaintiff requests trial by jury of all claims that can be so tried.

Dated: October 1, 2009

PATRICIA BLAGOJEVICH

By: 
One of Her Attorneys

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EXHIBIT A

chicagotribune.com

Former Illinois First Lady Patti Blagojevich uses agency's e-mail list to hawk husband's book

Kristen Mack

September 17, 2009

Former Illinois First Lady Patti Blagojevich used the contact list from her former fundraising gig to drum up business for her husband's book, "The Governor," a director at the Christian Industrial League said Wednesday.

Blagojevich landed the job at the Chicago homeless agency last fall. By winter, she was let go. Apparently she thought it was OK to take the donor list with her.

It's amusing that the league wanted her for her political connections and is now complaining about her using its connections, acknowledged Rick Roberts, the agency's senior director of strategy. Roberts, a former executive director, was tapped to resuscitate the group a month after Blagojevich was fired. The league is struggling to stay afloat.


"The last thing we need is to have Mrs. Blagojevich showing poor judgment and unethical behavior," Roberts said. "Our list is proprietary."

Roberts said some upset donors who got pleas to buy indicted ex-Gov. Rod Blagojevich's book threatened to stop contributing to the league.

"As goofy as they have been, I was surprised she would do this," Roberts said of Patti Blagojevich, who ate tarantulas on this summer's reality TV show "I'm a Celebrity ... Get Me Out of Here!"

"I know they need to make money. But that doesn't excuse her behavior," he said.

\$399: 5-Night Caribbean Vacation



Includes roundtrip airfare to Curacao and 5 nights in a 4-star Marriott resort. This package regularly costs \$1600.

As seen on TRAVELZOO

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Patti denies taking charity's donor list

IT'S 'MY LIST' | Accused of using it to contact people to promote ex-gov's book

Comments

September 18, 2009

BY **NATASHA KORECKI** Federal Courts Reporter/nkorecki@suntimes.com

A fuming Patti Blagojevich fired back Thursday at "galling" allegations that she absconded with a contact list from her old job at a charity so she could promote her husband's new book.

In an interview with the Chicago Sun-Times, Blagojevich said she took no such list from the Chicago Christian Industrial League, despite public comments from an official with the group who accused her of acting unethically.

Patti Blagojevich, who was fired from the charity group in January, said the list was hers to begin with. In her post as director of development with the charity last year, she created a list for outreach and fund-raising, she said.

There was no such database before she arrived, Illinois' former first lady said, so, starting from scratch, she placed 600 of personal contacts she had accumulated over the years into the index.

"The galling thing about this is before I got to CCIL -- there was no e-mail list. They had no e-mail outreach at all," she said. "I dumped all my contacts of all my friends. . . . Their list is my list."

On Wednesday, Rick Roberts, director of strategy for the charity, told Sun-Times columnist Michael Sneed that Patti Blagojevich upset donors because she was contacting people off the group's donor list to promote former Gov. Rod Blagojevich's new book.

"Patti is using the list to e-mail and mail letters to people suggesting they buy her husband's book, and it's very, very bad form and unethical," Roberts said Wednesday.

On Thursday, Roberts took issue with Patti Blagojevich's defense.

"We're a century-old organization. To say there was no contact list is absolutely ludicrous," Roberts said.

Roberts said Presbyterian donors as well as former and current board members were among those who complained of receiving solicitations to buy the ex-governor's book. Those people wouldn't have been brought to the table by Patti Blagojevich, he said.

Roberts contended the league lost money during her tenure. "The league realizes clearly -- clearly -- it made a mistake hiring Patti."

Patti Blagojevich said she signed a one-year contract that would have expired this September. She was fired in January after her husband was arrested because the group didn't want the bad publicity. She said she could have sued for the remainder of her salary, "but I didn't want to take money away from homeless people."

She said she regretted having to leave, saying she believed in the league. She said she had successes there in her short time, despite it being a "total financial disaster."

She said her successes included forming partnerships with other social agencies and winning a \$250,000 federal grant with the help of U.S. Representatives Danny Davis and Luis

Gutierrez. She said the league was hampered by tax issues that barred her from doing any fund-raising during her first month.

A former executive at the league, who asked not to be named, supported the contentions by Illinois' former first lady. "It was Patti's list that she brought in with her. There was never any contact list to begin with," said the executive who worked at the the charity for two years before Patti Blagojevich's arrival. "[Roberts] is talking because CCIL is struggling and hasn't been in the papers. When you're out of the media for a while, you've got to create some stir -- that's all this is."