

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT  
SALINE COUNTY, ILLINOIS

**FILED**

SEP 29 2011

*Handwritten Signature*  
CLERK OF THE CIRCUIT COURT  
SALINE COUNTY, STATE OF ILLINOIS

BOBBI JO CARRIGAN, CHRIS CARRIGAN, )  
and KARLA CARRIGAN, )

Plaintiffs )

vs. )

NO. 2011-L-40

TODD A. FORT, DONALD KEITH BROWN, )  
Sheriff of Saline County, Illinois, HARRISBURG )  
COMMUNITY UNIT #3 SCHOOL DISTRICT, )  
and THE COUNTY OF SALINE, ILLINOIS, )

Defendants )

ORIGINAL

COMPLAINT

COUNT I

NOW COMES the Plaintiff, BOBBI JO CARRIGAN, by her attorneys, the WOMICK LAW FIRM, CHTD., and for her Complaint against the Defendants, TODD A. FORT; DONALD KEITH BROWN, Sheriff of Saline County, Illinois; HARRISBURG COMMUNITY UNIT #3 SCHOOL DISTRICT; and THE COUNTY OF SALINE, ILLINOIS, states in addition to, and in the alternative to, other Counts herein as follows:

1. That the Plaintiff, BOBBI JO CARRIGAN, is now eighteen (18) years of age and at all times referred to herein was the daughter of Chris Carrigan and Karla Carrigan;
2. That on or about September 2009, the Plaintiff, BOBBI JO CARRIGAN, hereafter Bobbi Jo, was a student at Harrisburg High School and was hired by the Defendant, DONALD KEITH BROWN, Sheriff of Saline County, Illinois, to perform clerical work for the Defendant, DONALD KEITH BROWN, Sheriff of Saline County, Illinois, and for The County

of Saline, Illinois;

3. That the Defendant Sheriff had appointed the Defendant Fort to be his Chief Deputy Sheriff and had assigned him the duties and responsibilities of, among other things, supervising the Plaintiff Bobbi Jo;

4. That soon after the Defendant Fort began supervising the Plaintiff, Bobbi Jo, he began a course of conduct designed and intended to sexually abuse Bobbi Jo, who was a minor, and who could not legally consent to sexual activity with the Defendant Fort;

5. That at all times referred to herein the Defendant Fort was also an elected member of the School Board of the Defendant, HARRISBURG COMMUNITY UNIT #3 SCHOOL DISTRICT, and had been chosen by other board members to serve as President of said school board and was serving in that position at all times referred to herein;

6. That due to the Defendant Fort's position as President of the School Board of the school where the Plaintiff, Bobbi Jo, was a student and his position as Chief Deputy Sheriff and supervisor of the Plaintiff, Bobbi Jo, the Defendant Fort was in a position of authority over the Plaintiff, Bobbi Jo;

7. That the Defendant Fort then engaged in aggravated criminal sexual abuse of the Plaintiff Bobbi Jo up until or about September of 2010, to which the Defendant has admitted by pleading guilty to the said criminal conduct;

8. That as a direct and proximate result of said aggravated criminal sexual abuse by the Defendant Fort, the Plaintiff Bobbi Jo has suffered injuries of a personal and pecuniary nature, including the loss of income and a decrease in the enjoyment of life of a permanent nature;

9. That at all times referred to herein the Defendant Fort was acting as the employee and agent of the Defendants, Donald Keith Brown in his capacity as the Sheriff of the County of Saline, the Harrisburg Community Unit #3 School District, and The County of Saline, Illinois, all of whom were and are responsible for his acts.

WHEREFORE, the Plaintiff, BOBBI JO CARRIGAN, prays for damages against the Defendants, TODD A FORT, DONALD KEITH BROWN, Sheriff of Saline County, Illinois, HARRISBURG COMMUNITY UNIT #3 SCHOOL DISTRICT, and THE COUNTY OF SALINE, ILLINOIS, for an amount in excess of Fifty Thousand (\$50,000.00) Dollars and demands trial by a jury of six.

## **COUNT II**

NOW COME the Plaintiffs, CHRIS CARRIGAN and KARLA CARRIGAN, by their attorneys, the WOMICK LAW FIRM, CHTD., and for Count II of their Complaint against the Defendants, TODD A. FORT; DONALD KEITH BROWN, Sheriff of Saline County, Illinois; HARRISBURG COMMUNITY UNIT #3 SCHOOL DISTRICT; and THE COUNTY OF SALINE, ILLINOIS, state in addition to, and in the alternative to other Counts herein states:

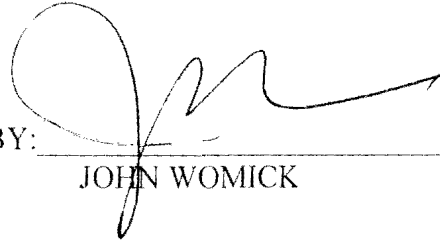
1-9. The Plaintiff repeats and realleges Paragraphs 1-9 of Count I as and for Counts 1-9 of Count II;

10. That as a result of the conduct of the Defendant Fort, as employee and agent for the Defendant Sheriff, The County of Saline, Illinois, and the Harrisburg Community Unit #3 School District, and as a direct and proximate result of said conduct the Plaintiffs, Chris Carrigan and Karla Carrigan, suffered a loss of their daughter's society and were required to incur medical

care for their daughter.

WHEREFORE, the Plaintiffs, CHRIS CARRIGAN and KARLA CARRIGAN, pray for damages against the Defendants, TODD A. FORT, DONALD KEITH BROWN, Sheriff of Saline County, Illinois, HARRISBURG COMMUNITY UNIT #3 SCHOOL DISTRICT, and THE COUNTY OF SALINE, ILLINOIS, for an amount in excess of Fifty Thousand (\$50,000.00) Dollars and demands trial by a jury of six.

WOMICK LAW FIRM, CHTD.

BY:   
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DAILY REGISTER