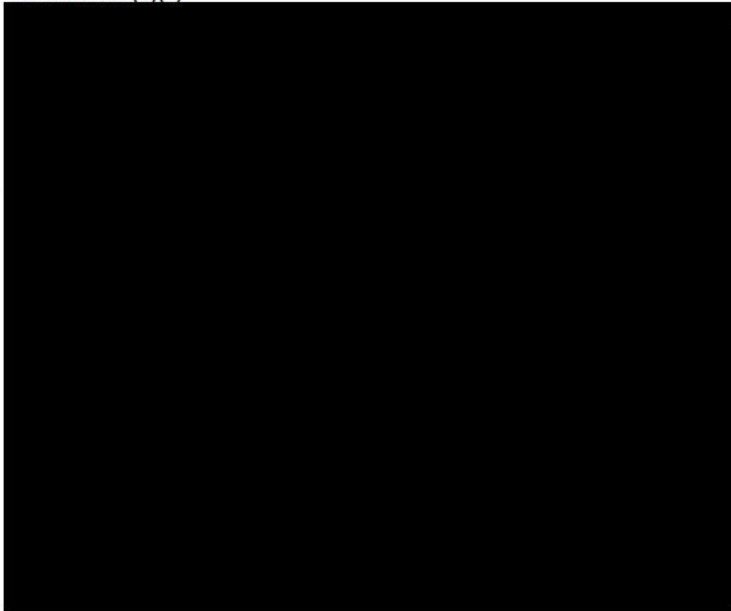


IN THE COURT OF CLAIMS OF THE STATE OF ILLINOIS

5 ILCS 140/7(1)(c)



FILED  
COURT OF CLAIMS  
JUL 02 2024  
Secretary of State and  
Ex-Officio Clerk Court of Claims

NO: **25CC0057**  
\$2,000,000.00 amount claimed per  
count

Claimant,

vs.

State of Illinois, Illinois State Police, Troop #3,

Respondents.

COMPLAINT

The Claimant(s),



by and through their attorneys, Romanucci

& Blandin, complains against Respondents, **State of Illinois, Illinois State Police, Troop #3**, as follows:

### **INTRODUCTION**

1. The Fourth of July parade in the City of Highland Park was going to happen again for the first time after two years of cancellation due to COVID-19. Countless people arrived early that morning eager to secure the best seats along the parade route, excited to see the floats, marching bands, and fanfare. Everything changed at 10:14 AM that morning, when gunfire mysteriously started turning the idyllic town of Highland Park into a war zone. And with that, Highland Park's Fourth of July Parade became another example of something all too uniquely American: the site of a mass shooting.

2. The bullets were coming from a nearby rooftop, where 21-year-old obsessed with violence and armed with a Smith & Wesson Military and Police ("M&P) assault rifle was indiscriminately targeting and killing people along the parade route. The Shooter exchanged one empty magazine for another at least three different times. He fired 83 rounds in seconds. Seven people were killed, dozens were injured, including the abovementioned claimants, and countless others will be traumatized forever.

3. The mass shooting at Highland Park's Fourth of July Parade was a foreseeable and entirely preventable result of the Illinois State Police's failure to act on the Clear and Present Danger Report, outlined in detail below.

4. At the age of 19, Robert Crimo III (the "Shooter") was able to purchase the M&P Assault Rifle, produced by Smith & Wesson, that was used to terrorize Highland Park. The Shooter's father sponsored his son's Firearm Owners Identification (FOID) card application,

despite knowing that his son was a clear and present danger and had only months before threatened suicide with a machete and threatened to kill everyone in his house.

PARTIES

5. [REDACTED] She was present at the Fourth of July Parade in Highland Park, along with members of her immediate and extended family [REDACTED]

[REDACTED]

6. [REDACTED]  
[REDACTED] He was present at the Fourth of July Parade in Highland Park, with members of his immediate and extended family.

[REDACTED]

7. [REDACTED]  
[REDACTED] was present at the Fourth of July Parade in Highland Park, along with

members of his immediate and extended family. [REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED], and they were present at the Fourth of July Parade in Highland Park. [REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

11.

[Redacted]

[Redacted]

12.

[Redacted]

[Redacted]

13.

[Redacted]

[Redacted]

14.

[Redacted]

[Redacted]

[REDACTED]

15. [REDACTED]

[REDACTED]

16. [REDACTED]

[REDACTED]

17. [REDACTED] Lake County, Illinois. [REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

19. [REDACTED]

at the Fourth of July Parade in Highland Park, along with members of her immediate and extended

family.

[REDACTED]

[REDACTED]

20.

[REDACTED]

[REDACTED] and was present at the Fourth of July Parade in Highland Park.

[REDACTED]

21.

[REDACTED]

was present at

the Fourth of July Parade in Highland Park, along with members of her immediate family.

[REDACTED]

[REDACTED]

22.

[REDACTED]

[REDACTED]

23.

[REDACTED]  
of July Parade in Highland Park, along with members of his immediate and extended family. [REDACTED]

24.

[REDACTED] was present at the Fourth of July Parade in Highland Park, along with members of her immediate and extended family. [REDACTED]

25.

[REDACTED] h  
of July Parade in Highland Park, along with members of her immediate and extended family. [REDACTED]

26.

27.

[REDACTED] was present at the Fourth of July Parade in Highland Park, along with members of her immediate family. [REDACTED]



28. [REDACTED] was present at the Fourth of July Parade in Highland Park, along with members of her immediate family. [REDACTED]

[REDACTED]

29. [REDACTED] the Fourth of July Parade in Highland Park. [REDACTED]

[REDACTED]

30. [REDACTED] was present at the Fourth of July Parade in Highland Park, along with members of his immediate family. [REDACTED]

[REDACTED]

31. [REDACTED] was present at the Fourth of July Parade in Highland Park, along with members of her immediate family [REDACTED]

[REDACTED]

32. [REDACTED] They are residents of Highwood, Illinois, and they were present at the Fourth of

**GENERAL ALLEGATIONS**

**I. The Respondents Enabled the Shooter by approving his FOID Application.**

33. The Respondent enabled the Shooter to carry out a massacre on July 4, 2022.

34. The Respondent enabled the Shooter's thirst for violence by ignoring and failing to act on the "clear and present danger report" that was filed in September 2019.

35. The Shooter had a turbulent youth. Between 2009 and 2014, police officers visited the Shooter's home nearly 20 times, nine of which involved reports of domestic violence. Upon information and belief, he attended Highland Park High School but dropped out before graduating.

36. The Shooter long demonstrated an interest in guns and other violent weapons.

37. In April 2019, when the Shooter was 18 years old, he attempted to commit suicide with a machete, and law enforcement was called to the home.

38. Later that year, in September, law enforcement again visited the home in response to alleged threats by the Shooter against a family member. At this time, police seized 16 knives, a dagger, and a sword from the Shooter after a family member reported to the police that he planned to "kill everyone." The Shooter was not charged with a crime, but a "clear and present danger report" was filed with the Illinois State Police.

39. In December 2019, at the age of 18, the Shooter applied for a FOID card that was sponsored by his father through a sworn affidavit.

40. As required by Illinois law, an applicant for a FOID card must show, among other things, that they are “[n]ot a person whose mental condition is of such a nature that it poses a clear and present danger to the applicant, or any other person in the community.”

41. Upon information and belief, the application did not include any information about the Shooter’s troubled behavior or his designation as a “clear and present danger” despite the September 2019 incident.

42. The Clear and Present Danger Report, pursuant to the Firearms Owners Identification Card (430 ILCS 65/8.1), is used to aid the Illinois State Police in identifying persons who, if granted access to a firearm or ammunition, pose an actual, imminent threat of substantial bodily harm to themselves or others that is articulable and significant, or who will *likely act in a manner dangerous to public safety*.

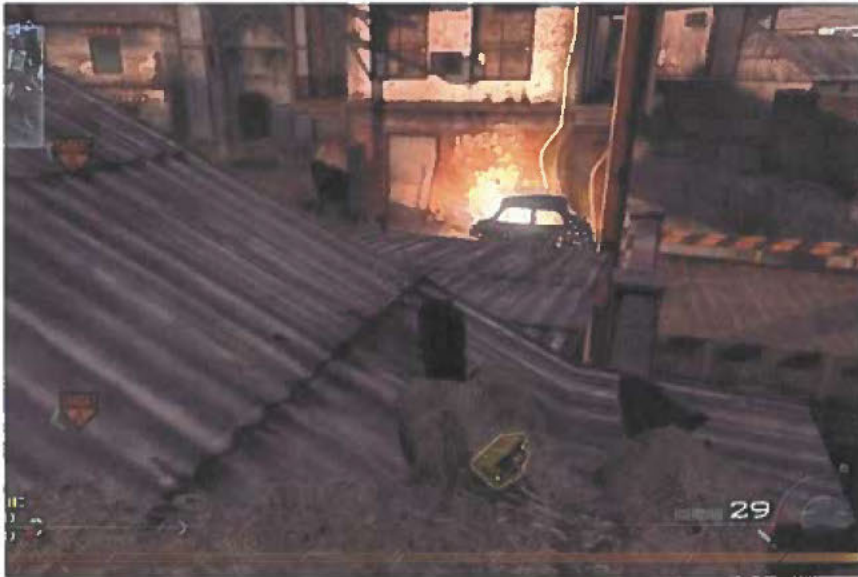
43. As early as September 2019, or approximately 34-months, the Illinois State Police knew or should have known that the Shooter presented a clear and present danger.

44. Despite the knowledge that the Shooter presented a “clear and present danger,” the Shooter’s FOID card application was approved in January 2020, allowing him to purchase firearms in Illinois.

## **II. The Shooter’s Dark History.**

45. The Shooter’s obsession with violence and weapons is well-documented. A review of his phone after the Fourth of July shooting showed photos of gore, dismembered bodies, and decapitated people. The Shooter also documented his alarming obsession with weapons and violence online, on his own websites and on various social media platforms, including but not limited to, Facebook, Instagram, YouTube, TikTok, Tumblr, Discord and Reddit.

46. For instance, upon information and belief, he would regularly post videos of himself playing Call of Duty<sup>1</sup>, such as:



47. He also posted many violent songs and music videos on platforms such as Spotify, YouTube and Apple Music, under the stage name “Awake the Rapper.” Upon information and belief, an archive of 17 YouTube videos prepared by or featuring the Shooter show his interest in firearms and are clearly tied to the militarized or murderous use of weapons as opposed to use for legally permissible recreational or self-defense purposes. His obsession with violence, including within the guise of military-style missions, made him a prime target for Smith & Wesson’s youthful, adrenaline-fueled, military-style marketing and advertising.

48. In one video, posted in January 2019, he rapped, “When I die, fuck it, I want to go to hell.”<sup>2</sup> In another music video, titled “Toy Solider,” he raps, “fuck this world.” The animated video for “Toy Soldier” opens with a student texting in class. Then, images of a heavily armed

<sup>1</sup> [<https://nypost.com/2022/07/06/robert-crimo-posted-call-of-duty-clips-of-characters-shooting-from-rooftops/>]

<sup>2</sup> <https://www.youtube.com/watch?v=laQ4L02fhDc>

shooter entering a school and opening fire are cut between scenes of him battling police outside. The shooter is seen lying in a pool of blood in the final scene.

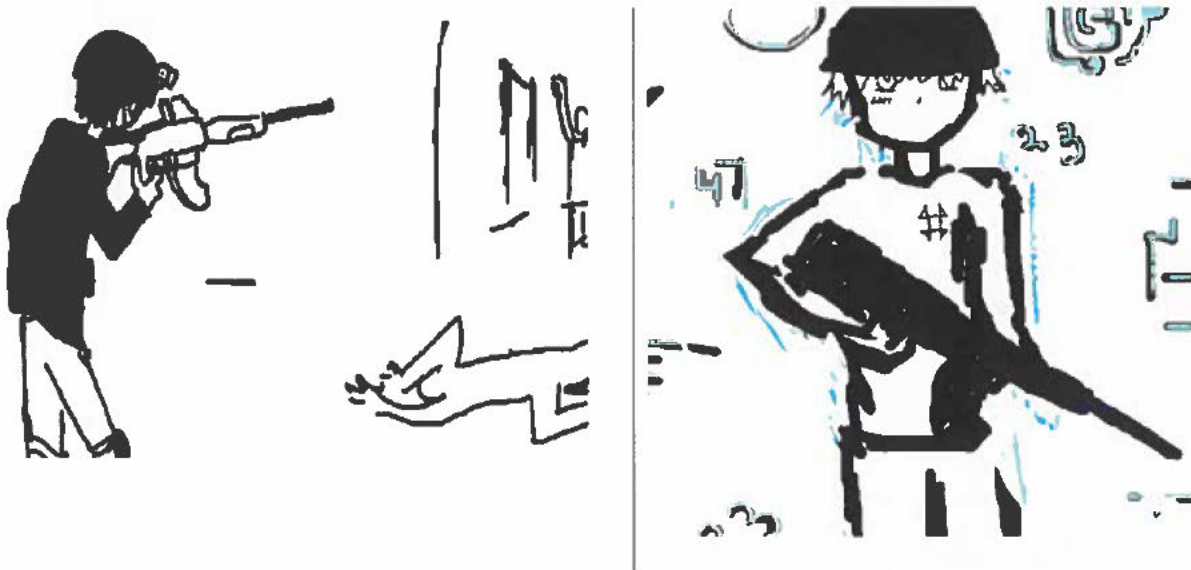


49. In another video prepared by and/or featuring the Shooter titled “On my Mind,” the Shooter is depicted holding the American flag while wearing tactical gear inside a vacant classroom.<sup>3</sup>



<sup>3</sup> <https://www.npr.org/2022/07/05/1109844728/highland-park-suspects-online-history-reveals-a-fascination-with-violence>; <https://www.thedailybeast.com/robert-bobby-crimo-person-of-interest-in-highland-park-parade-massacre-is-rapper-with-creepy-videos>.

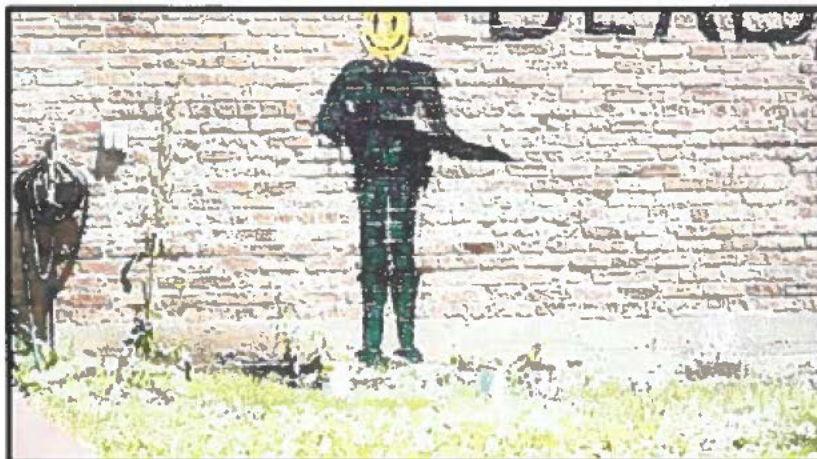
50. In yet another video prepared by the Shooter, he raps alongside clips of what appears to be him carrying a weapon, “Like a sleepwalker, I am breaking through no matter what.”



51. In October 2021, the Shooter posted an ominous video, titled “Are you Awake?” Over flashing images of a massacre with an assault rifle, he rapped:

I need to just do it. It is my destiny. Everything has led up to this.  
Nothing can stop me, not even myself. Is there such a thing as  
freewill.

52. The Shooter’s obsession with firearms and violence was not limited to music videos. In the backyard of his mother’s Highland Park home, the Shooter filmed himself painting a full-sized soldier, with a yellow smiley face for a head, brandishing an assault rifle.



53. On June 2, 2020, the Shooter joined the message board “Documenting Reality,” in which he gave himself the rank “Master Gunnery Sergeant.” He used this platform to engage in hateful speech and to discuss graphic depictions of death:



54. The Shooter’s obsession with his firearms was clear: his phone contained numerous photos of himself posing with the guns, sometimes wearing a “Siege” style mask, and sometimes wearing body armor.

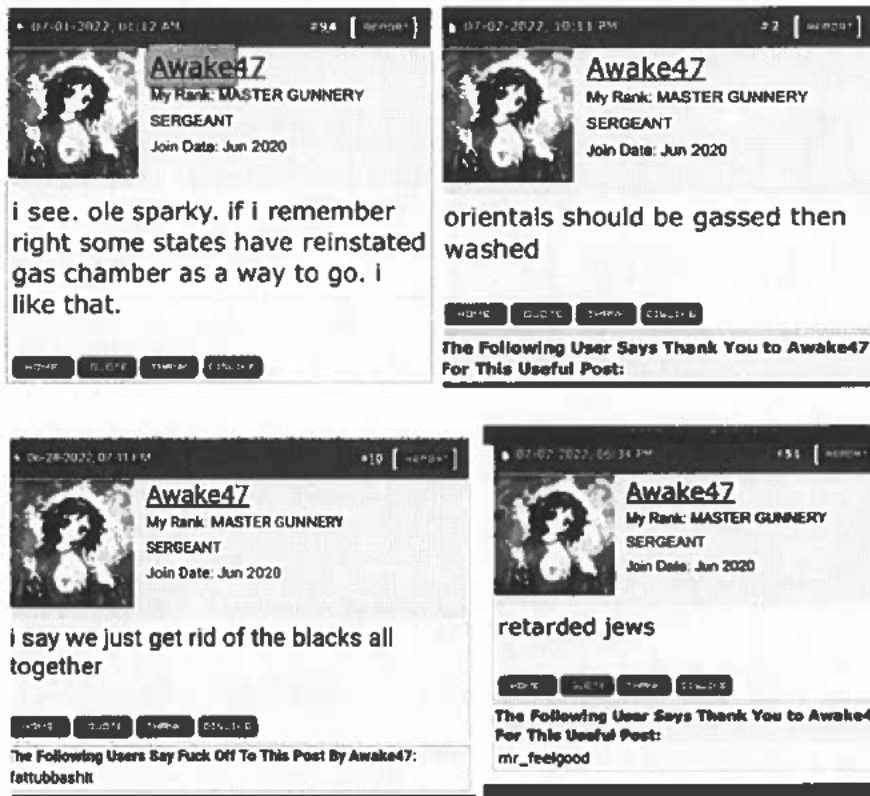
### III. Lead Up to the Fourth of July Shooting

55. The Shooter posted videos of what appears to be a portion of Highland Park’s Fourth of July Parade on his social media almost a year before the shooting.

56. According to the ADL’s Center on Extremism, the Shooter stopped posting on most of his social media accounts several months prior to the shooting.

57. Approximately a week before the shooting, he was seen investigating a rooftop access building on Central Avenue in Highland Park.

58. In the days before the shooting, he posted hateful messages on the Documenting Reality message board:



59. On July 3, 2022, he wrote himself a note on his phone outlining the steps required to conceal his identity during the attack.

60. On or before the morning of July 4, 2022, the Shooter packed his firearms, accessories, and three 30-round magazines in preparation to bring Smith & Wesson's promises of limitless and relentless power into fruition.

61. On or around 8:30am on July 4, 2022, the Shooter was seen riding around the intersection of Central Avenue and 2nd Street on his electric bike casing the scene prior to the parade starting.



62. He approached the Ross Cosmetics building, a local store on the northwest corner of Central Avenue and 2nd Street in Highland Park, Illinois. The Shooter gained access to the rooftop of the building by using an unsecured ladder attached to it.

63. Starting at or around 10:14 a.m., using the Smith & Wesson M&P assault rifle, the Shooter fired a total of 83 shots indiscriminately at the hundreds of people gathered to watch and participate in the parade.

IV. [REDACTED]

64. [REDACTED] were enjoying the parade. A groups of marchers threw candy into the crowd and [REDACTED] pick the candy up. All of a sudden, [REDACTED] [REDACTED]—who has been attending the Fourth of July parade for many years—remarked that it was unusual for there to be fireworks at the parade. [REDACTED]

[REDACTED]

65. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

66.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

V.

[REDACTED]

67. [REDACTED] have been attending the Highland Park Fourth of July Parade for years. This year, like every year, they woke up early to get good seats along the parade route, [REDACTED]

[REDACTED]

68. [REDACTED] were all enjoying the parade when the shooting started at or around 10:14 a.m.

[REDACTED]

69.

[REDACTED]

[REDACTED]

70.

71.

72.

73.

first, but then victims started piling in.

74.

[REDACTED]

[REDACTED]

VI. [REDACTED]

75. L [REDACTED] at the July 4<sup>th</sup> Parade  
in Highland Park [REDACTED]

[REDACTED]

76. [REDACTED] was enjoying the parade until the shooting started at or around 10:14 a.m.

[REDACTED]

77. [REDACTED]

[REDACTED]

VII. [REDACTED]

78. [REDACTED]

[REDACTED]

[REDACTED]

79. They were all enjoying the parade until the shooting started at or around 10:14 a.m.

[REDACTED]

80. [REDACTED]

[REDACTED]

81. [REDACTED]

[REDACTED]

82. [REDACTED]

[REDACTED]

83. [REDACTED]

[REDACTED]

[REDACTED]

84. [REDACTED]

[REDACTED]

85. [REDACTED]

[REDACTED]

86. [REDACTED]

[REDACTED]

87. [REDACTED]

[REDACTED]

VIII. [REDACTED]

88. [REDACTED]

4th Parade in Highland Park after a two-year hiatus because of the pandemic. They arrived around

[REDACTED]

89. [REDACTED] was enjoying the parade until the shooting started at or around 10:14

a.m. [REDACTED]

[REDACTED]

90. [REDACTED]

[REDACTED]

IX. [REDACTED]

91. [REDACTED] the July 4th Parade in Highland Park for years. This year, like every other, [REDACTED] woke up early to get good seats along the parade route, which [REDACTED]

[REDACTED]

92. Upon information and belief, [REDACTED] was enjoying the parade until the shooting started at or around 10:14 a.m. [REDACTED]

[REDACTED]

93. [REDACTED] ng

[REDACTED]

X.

[REDACTED]

94. [REDACTED] July 4th Parade in Highland Park for the last few years,

[REDACTED]

95. Upon information and belief, [REDACTED] was enjoying the parade until the shooting started at or around 10:14 a.m. [REDACTED]

[REDACTED]

96.

[REDACTED]

[REDACTED]

XI.

[REDACTED]

97. [REDACTED] the Highland Park Fourth of July Parade as spectators for years, [REDACTED]

[REDACTED]



98. They were all enjoying the parade when the shooting started at or around 10:14

a.m.

99.

100.

101.

102.

103. [REDACTED]

[REDACTED]

104. [REDACTED]

[REDACTED]

**XII.** [REDACTED]

105. [REDACTED]

Parade in Highland Park after a two-year hiatus because of the pandemic. [REDACTED]

10:00 a.m. and [REDACTED]

[REDACTED]

106. [REDACTED] was enjoying the parade until the shooting started at or around 10:14

a.m. S [REDACTED]

[REDACTED]

107. [REDACTED]

[REDACTED]

**XIII.**

[REDACTED]

108. [REDACTED] was excited to go to the July 4th Parade in Highland Park after a two-year hiatus because of the pandemic. [REDACTED]

[REDACTED]

109. [REDACTED] was enjoying the parade until the shooting started at or around 10:14 a.m. Sitting near the front entrance of Gearheads, t [REDACTED]

[REDACTED]

110. [REDACTED]

[REDACTED]

[REDACTED]

111. C [REDACTED]

[REDACTED]

[REDACTED]

**XIV. The Impact of the Shooting on [REDACTED]**

112. [REDACTED]

[REDACTED] were excited to go to the July 4th Parade in Highland Park after a two-year hiatus because of the pandemic. [REDACTED]

113. [REDACTED] was enjoying the parade until the shooting started at or around 10:14 a.m. [REDACTED]

114. [REDACTED]

XV. [REDACTED]

115. [REDACTED] was eagerly awaiting the July 4th Parade in Highland Park after a two-year hiatus because of the pandemic. [REDACTED]

116. They were all enjoying the parade until the shooting started at or around 10:14 a.m.

[REDACTED]

117.

[REDACTED]

[REDACTED]

118.

[REDACTED]

[REDACTED]

**COUNT I**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

119. [REDACTED] adopts paragraphs 1-5 and 33-66 as though fully stated as and for Paragraph 119 of this Count I.

120. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

121. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

122. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

123. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

124. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

125. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

126. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

127. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

128. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

129. The Respondents actions caused the shooter to have access to guns.

130. Each of the actions by the Respondent constitutes negligence.

131. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

132. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

133. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

134. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT II**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

135. The Claimant(s), [REDACTED]

[REDACTED] adopts

paragraphs 1-4, 33-63, and 67-74 as though fully stated as and for Paragraph 135 of this Count II.

136. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

137. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

138. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

139. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

140. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

141. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

142. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”



143. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

144. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

145. The Respondents actions caused the shooter to have access to guns.

146. Each of the actions by the Respondent constitutes negligence.

147. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

148. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

149. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

150. WHEREFORE, the Claimant(s), [REDACTED]

[REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT III**  
**(Common Law Negligence)**

151. The Claimant(s), [REDACTED], adopts paragraphs 1-4, 33-63, and 75-77 as though fully stated as and for Paragraph 151 of this Count III.

152. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

153. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

154. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

155. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

156. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

157. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

158. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

159. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

160. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

161. The Respondents actions caused the shooter to have access to guns.

162. Each of the actions by the Respondent constitutes negligence.

163. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

164. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

165. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

166. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT IV**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

167. The Claimant(s), [REDACTED]

[REDACTED] adopts paragraphs 1-4, 33-63, and 78-87 as though fully stated as and for Paragraph 167 of this Count IV.

168. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

169. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

170. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

171. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

172. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

173. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

174. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

175. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

176. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

177. The Respondents actions caused the shooter to have access to guns.

178. Each of the actions by the Respondent constitutes negligence.

179. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

180. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

181. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

182. WHEREFORE, the Claimant(s), [REDACTED], through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT V**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

183. The Claimant(s), [REDACTED]

[REDACTED], adopts paragraphs 1-4, 33-63, and 88-90 as though fully stated as and for Paragraph 183 of this Count V.

184. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

185. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

186. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

187. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

188. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

189. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

190. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

191. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

192. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

193. The Respondents actions caused the shooter to have access to guns.

194. Each of the actions by the Respondent constitutes negligence.

195. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

196. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

197. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

198. WHEREFORE, the Claimant(s), [REDACTED]

[REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT VI**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

199. The Claimant(s), [REDACTED], adopts paragraphs 1-4, 33-63, and 91-93 as though fully stated as and for Paragraph 199 of this Count VI.

200. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

201. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

202. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

203. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

204. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

205. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

206. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”



207. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

208. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

209. The Respondents actions caused the shooter to have access to guns.

210. Each of the actions by the Respondent constitutes negligence.

211. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

212. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

213. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

214. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT VII**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

215. The Claimant(s) [REDACTED] adopts paragraphs 1-4, 33-63, and 94-96 as though fully stated as and for Paragraph 215 of this Count VII.

216. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

217. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

218. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

219. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

220. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

221. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

222. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

223. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

224. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

225. The Respondents actions caused the shooter to have access to guns.

226. Each of the actions by the Respondent constitutes negligence.

227. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

228. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

229. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

230. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT VIII**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

231. The Claimant(s), [REDACTED], adopts paragraphs 1-4, 33-63, and 97-104 as though fully stated as and for Paragraph 231 of this Count VIII.

232. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

233. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

234. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

235. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

236. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

237. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

238. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

239. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

240. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

241. The Respondents actions caused the shooter to have access to guns.

242. Each of the actions by the Respondent constitutes negligence.

243. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

244. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

245. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

246. WHEREFORE, the Claimant(s) [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT IX**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

247. The Claimant(s), [REDACTED] adopts paragraphs 1-4, 33-63, and 105-107 as though fully stated as and for Paragraph 247 of this Count IX.

248. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

249. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

250. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

251. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

252. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

253. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

254. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

255. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

256. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

257. The Respondents actions caused the shooter to have access to guns.

258. Each of the actions by the Respondent constitutes negligence.

259. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

260. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

261. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

262. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT X**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

263. The Claimant(s) [REDACTED]

[REDACTED] adopts paragraphs 1-4, 33-63, and 108-111 as though fully stated as and for Paragraph 263 of this Count X.

264. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

265. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

266. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

267. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

268. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

269. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

270. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”



271. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

272. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

273. The Respondents actions caused the shooter to have access to guns.

274. Each of the actions by the Respondent constitutes negligence.

275. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

276. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

277. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

278. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT XI**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

279. The Claimant(s) [REDACTED] adopts paragraphs 1-4, 33-63, and 112-114 as though fully stated as and for Paragraph 279 of this Count XI.

280. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

281. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

282. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

283. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

284. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

285. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

286. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

287. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

288. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

289. The Respondents actions caused the shooter to have access to guns.

290. Each of the actions by the Respondent constitutes negligence.

291. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

292. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

293. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

294. WHEREFORE, the Claimant(s), [REDACTED]

[REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

**COUNT XII**  
**(Common Law Negligence)**  
**[REDACTED] v. Illinois State Police**

295. The Claimant(s),

adopts paragraphs 1-4, 33-63, and 115-118 as

though fully stated as and for Paragraph 295 of this Count XII.

296. It is well documented that long before the Fourth of July shooting, the Shooter was too dangerous and unstable to have access to weapons, including firearms – and the Respondents knew or reasonably should have known that the Shooter presented a “clear and present danger.”

297. In April 2019, at the age of 18, the Shooter attempted to commit suicide with a machete.

298. Just a few months later, in September 2019, the Shooter made threats to a family member, who reported that the Shooter planned to “kill everyone.” When law enforcement came to the home, they seized 16 knives, a dagger, and a sword from the Shooter. However, the Shooter’s Father said that the weapons were his, and both parents denied that the Shooter had threatened anyone.

299. Upon information and belief, as a result, the Shooter was not charged with a crime, but a “clear and present danger report” was filed with the Illinois State Police.

300. Upon information and belief, the Shooter’s Father knew that his son had deemed a “a clear and present danger” in September of 2019.

301. Despite this, in December 2019, he sponsored his son’s application for a FOID card, which would allow the Shooter to purchase and possess firearms.

302. Upon information and belief, the form that the Shooter’s Father signed stated the following: “I hereby give my consent for this minor applicant to possess and acquire firearms and firearm ammunition and understand I shall be liable for any damages resulting from the minor applicant’s use of firearms or firearm ammunition.”

303. Without his father's sponsorship, the Shooter would not have been able to obtain a FOID card, through the state of Illinois, and would not have been able to purchase, at the age of 19, the Smith & Wesson M&P rifle that he used to commit the shooting.

304. The Respondents were aware or should have been aware that the Shooter presented a "clear and present danger" which would have disqualified him from obtaining a FOID card prior to the Fourth of July shooting and/or which would have allowed his guns to be taken away from him.

305. The Respondents actions caused the shooter to have access to guns.

306. Each of the actions by the Respondent constitutes negligence.

307. As a direct and proximate result of the negligence of the Shooter's Father, the Claimant has sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

308. As a direct and proximate result of the negligence of the Respondents, the Claimant has incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

309. Accordingly, the Claimant is entitled to recovery against the Respondents in an amount to be determined at trial.

310. WHEREFORE, the Claimant(s), [REDACTED] through undersigned counsel, asks that a judgment be entered against the Respondent, **State of Illinois, Illinois State Police, Troop #3**, in a fair and just amount in excess of Fifty-Thousand Dollars (\$50,000.00).

Dated: July 02, 2024

Respectfully Submitted,

  
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