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

JANE DOE,)
)
Plaintiff,)
)
v.) Case No.:
)
WILLOW CREEK COMMUNITY)
CHURCH, INC., an Illinois)
Not-For-Profit Corporation.)
)
Defendants.)

COMPLAINT AT LAW

NOW COMES Plaintiff, JANE DOE, by and through her attorneys, Dudley & Lake, LLC, and complaining of the Defendants, WILLOW CREEK COMMUNITY CHURCH, INC., an Illinois Not-For-Profit Corporation, states as follows:

FACTS COMMON TO ALL COUNTS

1. Defendant, Willow Creek Community Church (“Willow Creek”), is an Illinois not-for-profit corporation and/or organization.
2. At all times relevant, Willow Creek owned, operated, managed, maintained, and/or controlled various properties, facilities, and organizations, including, but not limited to, its headquarters and principal place of business located at 67 East Algonquin Rd., Village of South Barrington, County of Cook, State of Illinois.
3. On and before Fall of 1996, Willow Creek Church established and operated a program known as the “Car Ministry”.
4. The Car Ministry accepted donated vehicles, performed maintenance, and repairs on those vehicles, and provided the vehicles to families in need.
5. The car ministry was located on property owned, operated, and controlled by

Willow Creek.

6. The Car Ministry consisted of a small office and a “barn” several hundred yards away where employees and/or volunteers performed maintenance and repairs on the vehicles.

7. At all times relevant, Willow Creek controlled the staffing, operation, supervision, and work assignments of the Car Ministry.

8. At all times relevant, Robert John Condon (hereinafter “Condon”) was an adult resident of Cook County, Illinois and was acting at all times herein as an employee, actual agent, implied agent, and/or apparent agent of Defendant Willow Creek.

9. On and before 1995, Willow Creek hired, retained, assigned, and/or permitted Condon to work in the Car Ministry.

10. At all times relevant, Condon was an employee, actual agent, implied agent, and/or apparent agent of Willow Creek in connection with his work in the Car Ministry.

11. At all times relevant, Condon was under the direct supervision, employment, and/or control of Defendant Willow Creek.

12. As an employee and/or agent assigned to the car ministry, Willow Creek had the duty to supervise, train, and monitor Condon in the performance of his work.

13. As an adult worker assigned to the Car Ministry, Condon occupied a position of authority, trust, and control over minor employees and volunteers working in the ministry.

14. At all times relevant, Plaintiff was a minor child under the age of 18 and lived with her parents in Hoffman Estates, Cook County, Illinois.

15. Before 1995, and at all times relevant, Plaintiff’s parents were members of Willow Creek.

16. Plaintiff began attending service and ministries at Willow Creek when she was

approximately 8 years old.

17. Plaintiff and her parents trusted Willow Creek and the persons whom Willow Creek selected, assigned, and permitted to operate its ministries.

18. Plaintiff's parents relied upon Willow Creek to provide a reasonably safe and adequately supervised environment for their minor daughter.

19. On or about 1995, at the age of 15 years old, Plaintiff began working in maintenance at Willow Creek on a part-time basis.

20. Between approximately 1996 and 1998, Willow Creek assigned and/or permitted Plaintiff to work in the Car Ministry.

21. At all times in which Plaintiff worked in the Willow Creek Car Ministry, she was a minor and under the age of 18.

22. Willow Creek assigned and/or permitted Plaintiff to work alongside Condon in the Car Ministry.

23. Through his position in the Car Ministry, Condon exercised actual and/or apparent authority over Plaintiff and her work

24. Willow Creek permitted Condon to have access to Plaintiff in the isolated Car Ministry office without adequate supervision or monitoring.

25. In approximately the Spring of 1997, when Plaintiff was 16 years old, Condon began grooming Plaintiff.

26. Between approximately 1997 and 1998, Condon sexually harassed, sexually touched, sexually abused, and/or sexually assaulted Plaintiff, including touching her in a sexual manner while at Willow Creek Church.

27. The physical and intimate contact of a sexual nature was knowingly imposed on

Plaintiff by Condon without any consent of Plaintiff.

28. The physical and intimate contact of a sexual nature included touching Plaintiff without consent, touching her when he talked to her, touching her lower back, rubbing her arms, and whispering in her ear.

29. Condon further made sexually suggestive and inappropriate comments to Plaintiff.

30. Condon repeatedly asked Plaintiff questions about sex, including which sexual positions she liked.

31. Condon made unwanted physical advances toward Plaintiff, while she worked under his supervision at Willow Creek Church.

32. This sexual harassment, touching, abuse, and assault occurred in the Car Ministry's office located on Willow Creek property

33. Condon used his position in the Car Ministry and the access, authority, and opportunity provided to him by Willow Creek to isolate Plaintiff in the office.

34. During some or all of these incidents, Condon would lock the door, preventing Plaintiff from leaving.

35. Willow Creek failed to provide adequate supervision or monitoring of the isolated Car Ministry office in which Condon was permitted to be alone with Plaintiff.

36. In Spring/Summer of 1998, Condon sexually assaulted/abused the plaintiff by touching her breast.

37. Later that evening, Condon went uninvited to Plaintiff's Hoffman Estates home in which Plaintiff lived with her mother and father, and he was asked to leave the home.

38. Willow Creek Elders were notified of the abuse and assault

39. Upon information and belief, Willow Creek did not conduct a reasonable and

complete investigation of Condon's conduct toward Plaintiff.

40. Upon information and belief, Willow Creek did not report Condon's conduct toward Plaintiff to law-enforcement or child-protection authorities.

41. After the assault in the summer of 1998, Condon remained a member of the church.

42. During a service, Condon publicly identified himself as a sex addict and a drug/alcohol addict who relapsed and that his conduct with the plaintiff was not proper.

43. Willow Creek organized, permitted, authorized, and/or controlled the service during which Condon publicly identified Plaintiff in connection with his sexual misconduct.

44. Robert Condon allegedly took a leave of absence and receive counseling.

45. Approximately six weeks later, Willow Creek permitted Condon to return.

46. At the time of the abuse, Plaintiff did not understand that the physical and intimate contact imposed on her by Condon constituted sexual harassment, assault, and battery.

47. Plaintiff terminated her employment at Willow Creek due to the abuse she suffered from Condon.

48. When Condon was working at Willow Creek he was a convicted felon.

49. Upon information and belief, Willow Creek failed to conduct an adequate investigation and background check before assigning and/or permitting Condon to occupy a position of trust and authority over minors.

50. The sexual abuse of Plaintiff and the circumstances under which it occurred caused her to develop confusion, various coping mechanisms, and symptoms of psychological disorders, including great shame, guilt, self-blame, anxiety, repressed memory, suppressed memory, and dissociation.

51. Furthermore, said psychological disorders began prior to Plaintiff turning 18.

52. The conditions that Plaintiff suffers from occurred prior to August 2024 and were the cause of her not recognizing or recalling the relationship and the injury she sustained as a result of the abuse.

53. Prior to August 2024, the memories of the childhood sexual abuse and the injury caused by Condon were psychologically repressed and suppressed by reason of the great pain and anguish created by the abuse.

54. The repression of these memories, the psychological effects that caused her to repress, block out, and not be aware of them, until such time as they returned to her in August 2024, was also the direct result of the nature of the sexual trauma committed by Condon when she was a child.

Count I – Negligence v. Willow Creek Community Church

1-54. Plaintiff realleges and repleads paragraphs 1-54 of Facts common to all counts as though fully set forth herein as paragraphs 1-54 of this Count I.

55. At all times relevant, Willow Creek employed, controlled, and/or supervised Condon.

56. At all times relevant, Willow Creek had the power to remove Condon from serving as a ministry employee.

57. Jane Doe, and Jane Doe's parents placed trust and faith in Willow Creek, allowed Jane Doe to seek employment with Willow Creek and work alongside its agent and/or employee, Condon.

58. At all times relevant, Willow Creek had a duty to protect Jane Doe from sexual assault by an employee and/or agent under its employ, supervision and/or control.

59. At all times relevant, Willow Creek had a duty to exercise reasonable care for the

safety and protection of Plaintiff while she worked in the Car Ministry

60. At all times relevant, Willow Creek had a duty to provide Plaintiff with a reasonably safe and adequately supervised workplace.

61. At all times relevant, Willow Creek had a duty to exercise reasonable care in supervising adult employees, agents, and volunteers who were permitted to work with minor employees.

62. Willow Creek had a duty to adequately investigate, screen, and/or do the proper background check on Robert John Cohon, prior to providing him the opportunity to work with minors.

63. Notwithstanding the foregoing duties, Willow Creek was negligent in or more of the following respects:

- a. Failed to provide Plaintiff with a reasonably safe and adequately supervised workplace;
- b. Permitted an adult employee, agent, and/or volunteer to work alone with Plaintiff, a minor;
- c. Permitted Condon to exercise authority and control over Plaintiff without adequate supervision;
- d. Failed to adequately supervise the Car Ministry;
- e. Failed to prevent Condon from isolating Plaintiff in the Car Ministry office;
- f. Failed to establish adequate policies and procedures governing adult interactions with minor employees;
- g. Failed to train its employees, agents, and volunteers, to recognize and prevent grooming, sexual harassment, sexual abuse, and inappropriate conduct toward minors;
- h. Failed to reasonably investigate and/or report the abuse suffered by Plaintiff.
- i. Failed to take reasonable steps to protect Plaintiff from further contact with Condon;
- j. Permitted Condon to return without adequate restrictions, monitoring, or safeguards; and
- k. Was otherwise negligent in the ownership, operation, management, staffing, and supervision of the Car Ministry.

64. The aforesaid conduct was undertaken by Robert John Condon, while being

employed with the car ministry and under the supervision of defendant Willow Creek.

65. As a direct and proximate result of one or more of the foregoing acts of negligence and/or omissions, Plaintiff was sexually harassed, touched, abused, and assaulted by Condon

66. As a direct and proximate result of the sexual assault and abuse, Jane Doe sustained and will continue to sustain injuries of a personal and pecuniary nature, including physical injury, emotional injury, psychological injury of a severe nature, including impacts on her relationships, vocational prospects, and financial condition since childhood, which still impact her to this day and are of an ongoing nature.

WHEREFORE, Plaintiff, JANE DOE, prays that this Court enter judgment in his favor and against Defendant, WILLOW CREEK COMMUNITY CHURCH, in an amount in excess of \$50,000.00, plus costs.

Count II – Negligent Hiring/Training/Supervision v. The Willow Creek Community Church

1-66. Plaintiff realleges and repleads paragraphs 1-66 as though fully set forth herein as paragraphs 1-66 of this of Count II.

67. Willow Creek had a duty to select, hire, assign, train, supervise, monitor, discipline and retain the employees, agents, and/or volunteers who worked in the Car Ministry, including Condon.

68. Willow Creek had a duty to draft, implement, and enforce policies and procedures governing the selection, training, supervision, and retention of Car Ministry employees, agents, and volunteers.

69. Willow Creek had a duty to oversee compliance with the Willow Creek policies for the training and hiring of employees who would staff its ministry.

70. Willow Creek had a duty to investigate the background and qualifications of persons, including Condon, whom it assigned and/or permitted to work with minors.

71. Willow Creek had a duty to exercise reasonable care in selecting, assigning, and retaining persons who were fit to occupy positions of trust and authority over minor employees.

72. Notwithstanding the aforementioned duties, Defendant Willow Creek, and through its agents and/or employees, was negligent in one or more of the following ways:

- a. Failed to reasonably investigate Condon's background and fitness before assigning and/or permitting him to work with minors;
- b. Failed to adequately train Condon concerning appropriate boundaries and interactions with minor employees;
- c. Failed to train Car Ministry supervisors to recognize grooming and inappropriate sexual conduct;
- d. Failed to adequately supervise Condon's interactions with Plaintiff;
- e. Failed to observe or discover conduct demonstrating that Condon was grooming, isolating, harassing, and sexually abusing Plaintiff;
- f. Negligently retained Condon.
- g. Failed to implement policies for training and hiring;
- h. Failed to enforce the policies for training and hiring;
- i. Failed to oversee compliance with those policies;
- j. Failed to properly oversee and supervise its ministry employees, including Robert John Condon; and
- k. Failed to properly oversee and supervise Condon to observe his activities and behaviors that demonstrated his proclivities for abuse and sexual assault of minors.

73. As a direct and proximate result of one or more of the foregoing negligent acts and/or omissions by Defendant Willow Creek, Plaintiff was sexually harassed, touched, abused, and assaulted.

74. As a direct and proximate result, Plaintiff sustained and will continue to sustain injuries of a personal and pecuniary nature, including physical and psychological injury, emotional distress, pain and suffering, loss of a normal life, impairment of relationships, impairment of

vocational and earning prospects, and expenses for medical, psychological, therapeutic, and counseling treatment.

WHEREFORE, Plaintiff, JANE DOE, prays that this Court enter judgment in her favor and against Defendant, WILLOW CREEK COMMUNITY CHURCH, in an amount in excess of \$50,000.00, plus costs.

Count III – Vicarious Liability

1-74. Plaintiff realleges and repleads paragraphs 1-74 as though fully set forth herein as paragraphs 1-74 of this of Count III.

75. At all times relevant, Condon was an employee, actual agent, implied agent, and/or apparent agent of Willow Creek in connection with his assigned work in the Car Ministry.

76. Willow Creek selected, assigned, controlled, and supervised Condon in connection with his Car Ministry work.

77. Willow Creek had a duty and authority to direct Condon's work and interactions with other Car Ministry employees, including Plaintiff.

78. Willow Creek had a duty to discipline, restrict, suspend, and/or remove Condon from the Car Ministry.

79. Willow Creek had a duty to prevent Condon from being alone with Plaintiff and other minors on Willow Creek's premises.

80. Willow Creek placed Condon in a position of trust and authority within the Car Ministry.

81. Willow Creek assigned and/or permitted Condon to work alongside Plaintiff, a minor employee.

82. Condon's position in the Car Ministry provided him with access to Plaintiff and the opportunity to exercise actual and apparent authority and control over her.

83. Condon used the workplace, authority, access, and opportunity provided to him by Willow Creek to isolate, groom, harass, touch, abuse, and assault Plaintiff.

84. The misconduct occurred while Condon and Plaintiff were present at Willow Creek's Car Ministry and while Condon was acting within the scope and authority of his position with Defendant Willow Creek.

85. The misconduct by Condon committed during the course and scope of his employment and or agency relationship was reasonably foreseeable to Defendant Willow Creek.

86. Willow Creek, through its employee and/or actual, implied, and/or apparent agent Condon, breached the aforesaid duties, by allowing Condon to:

- a. Groom the Plaintiff;
- b. Allowed Condon to make sexually suggestive and inappropriate comments to Plaintiff;
- c. Allowed Condon to sexually harass Plaintiff;
- d. Sexually touching Plaintiff without her consent;
- e. Allowed Condon to sexually abuse and assault Plaintiff.

87. As a direct and proximate result of one or more of the foregoing negligent acts and/or omissions of Defendant Willow Creek, by and through its employee and/or agent Condon, Plaintiff was sexually harassed, touched, abused, and assaulted.

88. As a direct and proximate result, Plaintiff sustained and will continue to sustain injuries of a personal and pecuniary nature, including physical and psychological injury, emotional distress, pain and suffering, loss of a normal life, impairment of relationships, impairment of vocational and earning prospects, and expenses for medical, psychological, therapeutic, and counseling treatment.

WHEREFORE, Plaintiff, JANE DOE, prays that this Court enter judgment in her favor and against Defendant, WILLOW CREEK COMMUNITY CHURCH, in an amount in excess of \$50,000.00, plus costs.

Pursuant to Illinois Supreme Court Rule 222(b), the undersigned counsel for the plaintiff avers that the money damages herein sought exceed FIFTY THOUSAND (\$50,000.00) DOLLARS.

Respectfully submitted,

/s/ Kevin J. Golden

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