

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

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CHAD READEY, )  
)  
Plaintiff, )  
)  
v. )  
)  
TAMARA N. HOLDER and )  
THE LAW FIRM OF TAMARA N. )  
HOLDER, LLC, )  
)  
)  
Defendants. )

Case No. \_\_\_\_\_

**COMPLAINT**

Plaintiff, CHAD READEY, by and through his attorneys, Nesenoff & Miltenberg, LLP and Elvis Gonzalez, Ltd., for his complaint against Defendants, TAMARA N. HOLDER and THE LAW FIRM OF TAMARA N. HOLDER, LLC, states as follows:

**INTRODUCTION**

1. This action arises out of Defendant Tamara Holder’s false claims against a male college athlete, representing her, and many others’ toxic beliefs about NCAA Division I male student athletes across the country. Holder falsely claims and advances her gender-biased view in the very first paragraph in her frivolous lawsuit against Plaintiff that there is a pattern of male student athletes “hid[ing] behind their elite schools and proud parents as they sexually abuse women.” Although Holder sets out to advance this fallacy for her professional gain under the guise of defending women’s rights by spreading and encouraging lies against Plaintiff, her statement could not be further from the truth. The reality is, Plaintiff Chad Readey, as well as many other male student-athletes across the country, was subjected to *false* claims of sexual assault solely for revenge and for the sake of ruining his career. The cycle and stereotypes must stop now.

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2. The Defendant – a lawyer named Tamara Holder – has now twice defamed a 20-year-old college athlete and former top student in his high school: Chad Readey. And she has done so for personal gain under the false auspices of advancing women’s rights.

3. More specifically, in January 2023, Holder filed a lawsuit against Readey, and in so doing, she falsely stated – separate from filing the complaint – that Readey had sexually assaulted a former high school classmate and six other women. Holder’s statements were false. Readey never sexually assaulted anyone, let alone six women. No one, and definitely not “more than six women,” as Holder falsely stated, had ever accused Readey of sexual assault.

4. In fact, the young woman who initially led others in the smear campaign to make similar false statements against Readey fully retracted her statements and apologized to Readey.

Exhibit 1.

5. Holder’s first lawsuit against Readey was previously dismissed for want of prosecution. Exhibit 2.

6. Then, in August 2023, Holder doubled down and filed a second lawsuit, this one against Northwestern University (“Northwestern” or “NU”), claiming Readey “raped” former lacrosse player Jane Doe<sup>1</sup>, and NU did nothing to prevent it. Exhibit 3.

7. Holder’s – and Doe’s – accusations are 100% false, and they know they are false.

8. Doe and Readey had a brief, consensual sexual encounter wholly initiated by Doe. If anything, Doe took advantage of Readey, as her own text messages to Readey make clear. Exhibit 4.

9. Specifically, in July 2022, after inviting Readey over to watch a movie with her, Doe, who is bisexual, initiated sexual contact with him. Immediately afterward she had the following text exchange with him:

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<sup>1</sup> Jane Doe is a pseudonym. Plaintiff reserves the right to reveal Jane Doe’s true identity if subsequent media concerning Plaintiff is continued.

Doe: “That was a fucked up mistake and I told [my girlfriend], just giving u a heads up. I should’ve never given you the idea that that was ok I genuinely have never regretted anything more in my life. You don’t have to tell [your girlfriend] but just letting u know I told my girlfriend.” *Id.*

Readey: “I talked to [my girlfriend].” *Id.*

Doe: “ok well it’s fucked and tell [your girlfriend] I’m so sorry and I don’t know whether it’s bc I was a weird high or just super anxious but I’m so fucking sorry.” *Id.*

10. As Doe’s texts make clear, she initiated the consensual encounter, said it was her idea, and apologized to Readey for it.

11. Doe then waited six months to report her alleged complaint to NU (and did so only once Holder defamed Plaintiff on her website) and then another seven months to sue NU (after a recent spat of unrelated suits against NU were filed).

12. To be clear: Readey is a victim, not an abuser of any sort. All the allegations against him are false. When his initial defamers made their false allegations, the ensuing investigation fully exonerated Readey. What has happened to Readey is an orchestrated conspiracy to destroy a young man’s life. The ringleader of the conspiracy is now Tamara Holder.<sup>2</sup>

13. One of the original ringleaders who orchestrated the campaign in 2020 to try to keep Readey out of Northwestern retracted her false statements a year later and apologized to Readey in writing.

14. But when Readey defended himself, another ringleader – Katelyn Nottke – texted Readey, stating “don’t worry I’ll make sure you never have a happy day in your life”:

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<sup>2</sup> Readey reserves the right to amend his complaint to add Holder’s co-conspirators, including other lawyers who have filed and maintained frivolous lawsuits against Readey and fed confidential student records to Holder in violation of court protective orders, as well as those who have worked with and fed Holder false information.



15. The tragic irony is that Readey is being victimized by false claims made by people supposedly championing women’s rights.

16. Given Defendants’ persistence in making demonstrably false, damning, and defamatory statements – despite clear access to the evidentiary record disproving *any* sexual impropriety – Plaintiff is left with no choice but to bring this action to defend his reputation so the public can finally have access to the truth instead of Defendants’ vindictive campaign of lies.

17. Though this complaint is about Chad Readey, it is sadly about issues much larger than Chad Readey. It is about Truth. It is about manipulation of vulnerable young people by adults with other agendas. It is a cautionary tale, especially for high-profile male student-athletes across the country subjected to false allegations.

**PARTIES**

18. Plaintiff Chad Readey (“Readey”) is a resident of the Village of Flossmoor, in Cook County, Illinois.

19. Defendant Tamara N. Holder (“Holder”) is a resident of Cook County, Illinois, who committed the actions alleged in this Complaint in Cook County, Illinois.

20. Defendant Law Firm of Tamara N. Holder, LLC, is Defendant Holder’s law practice, located at 917 W. Washington Blvd., Suite 222, Chicago, Illinois, Cook County, Illinois.

**JURISDICTION AND VENUE**

21. As a court of general jurisdiction, the Court has subject matter jurisdiction over the instant dispute.

22. Pursuant to 735 ILCS § 5/2-209(a)(1), (2), and/or (b)(1), (2), and (4), the Court has personal jurisdiction over the Defendants.

23. Pursuant to 735 ILCS § 5/2-101, venue is proper because Cook County is each Defendant’s “county of residence” and/or “the county in which the transaction or some part thereof occurred out of which the cause of action arose.”

**FACTS**

24. The facts of this case stem from events in high school when Readey was a minor.

25. Readey is a May 2021 graduate of Homewood-Flossmoor Community High School (“HF”), where he excelled both in the classroom – graduating first in his class of 707 students – and on the field.

26. While a student at HF, Readey was enrolled in the selective and rigorous International Baccalaureate (“IB”) Program, recognized as a program for the school’s highest academic performers.

27. As an athlete, Readey started off as a highly touted basketball prospect. He was the first HF player in more than a decade to play varsity basketball as a freshman. As a sophomore, he earned a varsity baseball spot, which became the sport he ultimately prioritized.

28. In the IB Program, Readey faced some resentment and envy because of his scholastic standing combined with his athletic prowess, as no other IB students excelled in sports and the classroom as Readey did.

**Readey's Sophomore Year: The *Non-Complaint***<sup>3</sup>

29. In December 2018, during his sophomore year, Readey tore ligaments in his ankle and was on crutches in the heart of winter.

30. As such, to get between the north and south buildings at HF, he rode a small, handicap-access bus between periods while rehabbing.

31. One student, Aria Sline, a friend from junior high, repeatedly asked Chad if she could carry his books and ride the bus with him the short ride between buildings. She had actually been lobbying to do it for weeks to replace a former girlfriend of Readey's, who was his usual helper when riding the bus during this two-month period. Sline was not in the IB Program.

32. For weeks Readey declined her offer to "help" him with his books.

33. But then one time, Readey agreed.

34. So on one December day, on the small bus for the roughly two minute ride between buildings, it was just Sline, Readey, and the bus driver on the small bus. Readey and Sline were both 15-years-old at the time.

35. As Sline would later admit to HF investigators, she had a "flirting" relationship with Readey at the time, stemming from their days in junior high. More to the point, she liked him.

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<sup>3</sup> The quotes come from the HF investigatory file, which for confidentiality purposes is not attached hereto as an exhibit, but which has been produced in related litigation.

36. So when they rode the bus this one day together, Sline, as she often did, flirted with Readey. In response, Readey “touched her shoulder and breast.”

37. As Sline would tell investigators *one year later*, “they had been friends and had been joking around when this happened.” She also told investigators that when it happened, “she said no and he stopped and then it didn’t happen again.” Readey claimed and told HF investigators at the time that she instead said: “no, not here.”

38. However characterized, it was a momentary, innocuous encounter between two adolescent friends. It was so innocuous that Sline told no one and reported nothing at the time.

39. In fact, Sline never made a complaint.

40. Instead, thirteen months later, one of her IB friends reported the incident as part of a broader complaint about tension between boys and girls in the IB Program.

#### **Readey’s Junior Year: Tension Withing the IB Program**

41. During the 2019-2020 school year, Readey’s junior year, a feud intensified between a group of IB girls (the “IB Girls”) and IB boys (the “IB Boys”) within the IB Program. The IB Girls accused the IB Boys of making derogatory and misogynistic comments, primarily related to class rankings and college admissions.

42. As the female dean of students described in an email she wrote contained in the investigative file: “from the onset, the IB incident was never presented to me as a sexual harassment concern by the administration, the IB coordinator, nor the students. It was, however, suggested that there was ‘gender tension’ among the junior IB cohort and the directive I was given was to conference with the students with the objective of creating a resolve.”

43. The tension came to a head in January 2020 with administrators holding peace circles and interviewing students.

44. At the time the IB Girls tried to recruit Readey to help their campaign to “ruin the college admissions files” for the targeted boys by launching a disciplinary investigation by HF

administrators, but Readey steadfastly refused to participate, as the IB Program was small and Readey wanted no involvement in any such drama, especially against classmates with whom he was friendly.

45. After Readey refused to participate or take sides, one IB girl – Katelyn Nottke – *then* created and reported to the HF administration Sline’s “sexual assault” experience on the bus from one year prior. Sline was brought into the administration office to make a statement, but Sline said that nothing further needed to be done regarding the alleged incident.

46. Nottke and Sline were close friends.

47. In fact, starting in high school, Nottke and Sline co-hosted a feminist podcast called (f)embolden. See <https://www.listennotes.com/podcasts/fembolden-aria-sline-and-katelyn-nottke-LE9B0Nc4356/>

48. Prior to this, Nottke had made numerous claims of sexual assault and sexual harassment against fellow students over the years. It was her calling card. In junior high she made a report against one student that resulted in the student being severely disciplined. As a person experienced in making allegations, Nottke knew the power of making such serious allegations and how simply an allegation can so disrupt a person’s life.

49. A few weeks prior to Nottke reporting Sline’s “sexual assault” to HF administration, she had also reported to Readey that she had been “raped” by Sline’s twin brother, Ari Sline. When Readey learned of the allegations, he confronted Ari Sline, but Ari denied the allegations.

50. At the time, Nottke also tried to recruit another female student – AR – to get her to say Readey sexually assaulted her, but because it was false, AR refused to participate in Nottke’s scheme.



51. Taking all allegations seriously, HF school administrators interviewed Sline as part of the IB investigation. During her interview, Sline admitted to having a “flirting” relationship with Readey, and she did *not* say he “grabbed” her breast.

52. Nor has Readey ever “admitted” to “grabbing” Sline’s breast (which would have been over her bra, shirt, and winter jacket). This false statement was first made by Holder’s co-counsel – David Fish – who falsely first asserted it in a pleading in Readey’s case against Victoria Olaleye, one of Fish’s clients. Holder now takes her co-counsel’s false statement from another case and repeats it both in her lawsuit against NU and outside the complaint she filed.

53. At the time, January 2020, after interviewing students and conducting due diligence, HF administrators did *not* indicate *any* characterization by Sline of this one-time incident from a year prior as sexual assault or harassment.

54. Other than Sline sharing her long-delayed, momentary bus experience prompted by Nottke’s urging, no other student at the time reported or claimed any improper sexual contact by Readey.

55. Most of the HF administrators’ investigation of the tensions within the IB program focused on *other* students, not Readey.

56. As a result, Readey (rightly) received no disciplinary action. Other than some tardies and absences marked in his student file, Readey had no blemishes or offenses in his file.

Exhibit 5.

**Readey’s Senior Year: Northwestern Recruits him for Baseball and Mob Turns on Readey**

57. Though a talented athlete in both baseball and basketball, Readey ultimately devoted himself to baseball. During the summer of 2020, between his junior and senior years (during Covid), Northwestern recruited him for baseball, offering him a scholarship.

58. Given NU’s stellar academics and Big 10 athletics, Readey immediately and happily accepted the offer. All his hard work had finally paid off, his dream realized.

59. But his joy lasted less than a day.

60. As is common, Readey proudly announced his recruitment and commitment to NU on social media, the main way to communicate in what was still the early stages of the pandemic. He did so on August 15, 2020. Exhibit 6.

61. But the resentment certain classmates still harbored towards Readey led to another targeted campaign of malicious smears against him, this time aimed at NU administrators and staff for the express purpose of getting NU to rescind its admission of Readey.

62. The next day, on August 17, 2020, approximately eight individuals emailed or otherwise sent written communications to senior officials at NU encouraging them to reverse Readey's acceptance and stating Readey was a "serial sexual abuser." Exhibit 7.

63. It was an orchestrated – somewhat clumsy – campaign, as all the emails were sent the same day with some language cut and pasted. The emails were sent to the admissions office, the baseball coach, and even to the then university president (Morton Schapiro).

64. The email campaign was led by former classmate, AV.

65. AV was actually one year ahead of Readey at HF. She had recently graduated, meaning when she sent her email to NU in August 2020, she was about to commence her freshman year of college.

66. AV was the first to write NU, sending an email just after midnight on August 17, 2020 to NU's admissions office. In her email, AV falsely wrote: "You recently admitted Chad Readey, a student from Homewood Flossmoor to pursue his academic college career at Northwestern. I would like to bring it to your attention that this student has sexually assaulted multiple women during his middle school and high school career. I experienced this firsthand when I was 12 years old but never reported it because I was unaware of what sexual assault even was at the time. Last school year, over 6 girls went to the school administration SEPERATELY

[sic] to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions for his repeated sexual assaults against several girls.” *Id.*

67. AV sent the exact same email to three different NU officials: one from her own email account, one from her Instagram account and one from an account bearing the names of her mother and older sister. In so doing, she even misspelled “SEPERATELY” identically in all 3 messages. Exhibit 8.

68. In Holder’s recent complaint against NU, Holder lazily cuts and pastes the AV emails and claims that AV’s mother was Readey’s “classmate.” Exhibit 3 at ¶ 30.

69. Holder’s pleading shows the carelessness and frivolity of the complaint she filed, unknowing and uncaring of what the actual facts are.

70. One year later, in August 2021, AV would retract everything she wrote: “I write this letter as a formal retraction of a false statement I made to Northwestern University, and others, about Chad Readey.” Exhibit 1. She continued:

On August 17, 2020, shortly after learning of Chad Readey’s early admission to Northwestern’s Class of 2025, I sent an email to Northwestern alleging that Chad Readey had been accused of sexually assaulting “more than six” female students at Homewood Flossmoor High School (HFHS), and that Chad Readey had “admitted” to these allegations. I made this claim based on information I received from another student and classmate of Chad Readey at HFHS. I have since come to learn that these allegations are false. NO students at HFHS had alleged that Chad Readey had sexually assaulted them, and Chad Readey DID NOT admit to sexually assaulting anyone. I have recently come to learn that, in fact, HFHS conducted what it considered to be an “exhaustive” investigation and found no evidence of conduct by Chad Readey considered sexual harassment or sexual assault. Unfortunately, prior to sending my email to Northwestern, I also shared its contents with some friends. The result was that others also sent similar emails to Northwestern based on the same false information. Though I did not post it, my false statement also ended up on a Twitter account called “@NUPredators.” All this has hurt Chad and threatens to put him in a false light when he joins the Northwestern community this fall. The purpose of this letter is to take responsibility for my actions, and to demand that “@NUPredators” immediately and permanently remove the post of my August 17, 2020, email to Northwestern University. . . . It was never my intention to spread false information, or to cause harm based on incorrect facts. , , , I apologize for any harm that may have resulted from my original statement.

71. AV was the ringleader for the group that would send approximately nine (seemingly) separate emails to NU that day seeking to ruin Readey's life. Specifically, she shared her email with others as the "sample," encouraging others to follow her lead. Exhibit 9.

72. AV encouraged others to write. And they did.

73. For instance, Victoria Olaleye, a classmate (not in the IB program), wrote to NU's President Morton Schapiro: "As someone who has gone to school with him for 7 years now, I don't think that this is the smartest nor [sic] safest decision you all can make. Chad Readey has a horrible and long record of sexually harassing and sexually abusing girls. The list of names is unfortunately very long." Exhibit 7.

74. Likewise, Camille Willis, another classmate, wrote to NU: "Hi! I'm Camille and I go to school and have gone to school with Chad since seventh grade. In the time I've known him I've talked with many girls who tell similar stories of being sexually assaulted by him. We've gone to our school administrators but he's never gotten more than a slap on the wrist. I just wanted to make sure you all were aware of the type of person you're admitting."

75. Another wrote: "My concern is centered about a student named Chad Readey, who attends Homewood Flossmoor High School – located in Flossmoor, Illinois. He was recently accepted and committed to the university's baseball program, but I believe his student status as a student should be reconsidered because of his past actions. According to his own admittance several months prior, Readey sexually assaulted a peer within his community. Knowing Northwestern's values and commitment to academia and scholarship, I beg that an investigation is launched into his actions, the accusations bade [sic] against him, and his personal admittance of fault." *Id.*

76. But none of the people who blast emailed NU *ever had made or filed a complaint of any sort against Readey* to HFHS.

77. Moreover, the campaign was so amateurish – but effective – that the defamers cut and pasted many of the same allegations.

**NU and HF Further Investigate: “No evidence supports the allegations.”**

78. The targeted email campaign worked. It immediately grabbed NU administrators’ attention. Within days, NU administrators and the baseball coach contacted HF for more information. NU was rightly concerned and internally debated how to handle the situation and whether to rescind its recruitment of Readey.

79. To suggest, as Defendant Holder and her client Doe now do in their (frivolous) lawsuit, that NU somehow failed to take the allegations seriously or looked the other way is utterly false. The record makes clear that NU took the allegations very seriously.

80. As a result of the NU email campaign AV orchestrated, HF conducted another investigation, including re-interviewing students and teachers. Like NU, HF took the allegations very seriously.

81. In its additional investigation, HF noted that “eight current and former students sent emails and made social media posts directed at Northwestern alleging . . . Chad Readey has a history of sexual assault and sexual harassment that has been reported to HF, but has not been addressed.” Exhibit 10. None of the eight students who contacted NU had previously made any complaints, let alone sexual complaints, against Readey.

82. The letter HF sent to Readey’s parents states: “After concluding our exhaustive search, the District has no record that substantiates the claims made by the women who contacted Northwestern.” *Id.* The letter states “none of the specific allegations of harassment in the IB program were against Chad. The women did raise more specific allegations against two other male students in the group.” *Id.*

83. HF reinvestigated the Sline bus incident from Chad’s sophomore year as well. *Id.* In so doing, HF re-confirmed it had all the information it originally received regarding Readey,

and no new information regarding Readey, and that no sexual assault of any sort had taken place, but HF did acknowledge receiving additional information relating to *other* students. *Id.*

84. In the end, the HF Title IX Officers wrote: “after a thorough and exhaustive investigation, we have no evidence that supports the allegations made by current and former students to Northwestern regarding Chad. None of the incidents that were reported were considered sexual harassment or sexual assault by the administrators investigating.” *Id.*

85. Even so, Northwestern investigated further on its own, including speaking with HF’s principal (a woman named Dr. Jerry Anderson), as well as even administrators at Readey’s junior high school.

86. To its credit, Northwestern followed the evidence and facts – not false allegations made by a mob hoping to destroy a person’s life – and allowed the truth to prevail and thus maintained its commitment to Readey, the athlete and top student.

87. Unfortunately, however, the classmates’ harassment and cyberbullying of Readey continued and worsened for the remainder of his senior year. Exhibit 11. And sadly, in today’s digital world, youthful mistruths spread across the internet may have life-lasting implications and effects.

88. In the coming months, Readey’s family discovered more and more defamatory comments across the internet – memorializing vicious falsehoods for the entire internet.

89. Readey’s family even attempted to have the HF administration hold mediations with the other classmates’ parents, with the hope that their differences could be resolved and the defamatory internet postings could be taken down and/or retracted. Most of the parents declined.

90. Just before seniors graduate each spring, HF students have a tradition called “Last Night as a Viking” where students re-live memories of their time together on social media with common hashtags. In recent years, the tradition has become ugly and mean-spirited. In spring

2021, for Readey’s “Last Night a Viking,” he was further defamed. Specifically, through anonymous posts like:



**Because Harassment of Readey Continues, He Files Defamation Lawsuit**

91. Readey and his family had hoped that with students graduating and starting new lives – along with a ringleader having retracted her false statements – that things would be different when he began at Northwestern. They hoped the false statements would finally stop.

92. But unfortunately, the defamation did not stop. Anonymous trolls continued to post statements. Even before he enrolled at NU, Readey faced questions from his new classmates and teammates. Though it was difficult, he tried to walk tall believing the truth is what matters and will prevail.

93. On July 1, 2022, after his freshman year, because many of his defamers still failed to retract their defamatory statements and AV’s words could not be removed from the @NUPredators post on Twitter, Readey finally fought back and defended his name by filing a defamation lawsuit against some of his defamers. Indeed, the @NUPredators post had been made on August 19, 2020, and efforts to remove the post have been unsuccessful, even after AV’s full retraction of her statement.

94. But filing the lawsuit led to further harassment and threats made by some of his defamers, as they doubled down after being exposed for their actions.

95. On July 29, 2022, when her friends were served as defendants and Nottke learned of the lawsuit, Nottke immediately texted Readey instructing him to “committ [sic] suicide” and stating, “don’t worry i’ll make sure you never have a happy day in your life”.

96. On September 6, 2022, two months after Readey filed his lawsuit, Aria Sline – who was not named as a defendant in the lawsuit – also reappeared. She provided an affidavit in the case in support of her former friend and classmate, Victoria Olaleye, who was named as a defendant in Readey’s defamation suit (defended by David Fish, Holder’s co-counsel in her NU lawsuit). Exhibit 12.

97. In her affidavit, Sline contradicted her prior statements and claimed Readey was a sexual predator who repeatedly harassed her throughout middle school and high school. *Id.* She now actually accused him of “sexual assault” for the sophomore year bus incident. *Id.* Specifically, she wrote in her affidavit: “Late in our sophomore year, I asked Chad to have a talk with me. He agreed to do so, I told him that he was not allowed to touch me ever again. Chad said ‘ok’ in response. However, he then immediately grabbed my breast. I considered it to be sexual assault.” *Id.*

98. Sline’s affidavit is false.

99. Sline’s affidavit is self-contradictory. For instance, she writes that it was “[l]ate in [her] sophomore year,” that Readey “grabbed” her breast. *Id.* Late in Sline’s sophomore year would mean spring of 2019. But per Sline’s own interview notes with HF, she alleged Readey touched (not grabbed) her breast in December 2018 when she was flirting with him. It also contradicts the statements she made to HF at the time.

100. Prior to Sline filing her (false) affidavit, Readey had not named her as a defendant in his lawsuit.

101. But on December 14, 2022, because Sline chose to insert herself in the defamation action by providing a false affidavit to the defendants, Readey’s lawyers informed her they planned



to add her as a party by December 30, 2022. In response, Sline’s mother asked for an additional week to obtain an attorney.

102. Readey’s counsel in good faith allowed such an extension on the condition that it be memorialized in writing, so as to allow them to maintain the legal action against Sline before the statutory cutoff. Exhibit 13.

103. But instead of responding to Readey’s lawyers’ outreach, Sline was working with Defendant Holder and her law firm to defame Readey.

### **Defendant’s First Defamatory Campaign Against Readey**

104. On December 29, 2022, Holder filed her lawsuit for Sline as “Jane Doe” against Readey alleging two counts: (a) Gender Violence, and (b) Intentional Infliction of Emotional Distress. Exhibit 14.

105. Sline’s lawsuit is frivolous.

106. In her lawsuit, Sline stated falsehoods such as:

- “on or about the Fall 2019 – Spring 2020 school year, at least six (6) Homewood-Flossmoor High School student reported to the Dean’s office that the defendant in this case, classmate Chad Readey was engaging in sexually abusive conduct towards them.” *Id.* at ¶ 4.
- “she had been sexually harassed and sexually assaulted by him for years, beginning when they were both students at Parker Junior High School, beginning on or about Fall 2015 – Spring 2016.” *Id.* at ¶ 5.
- “Ms. Doe told officials that Chad Readey habitually sexually harassed her and touched her without her consent over the course of several years.” *Id.* at ¶ 8.
- “While in high school, Ms. Doe never expressed a romantic or sexual interest in Chad Readey, nor did she spend time with him outside of group, social events.” *Id.* at ¶ 27.
- Sline told high school officials “that Chad Readey had sexually harassed her for years.” *Id.* at ¶ 37.

Together the “Sline False Statements.”

107. False statements made in a filed complaint are privileged.

108. But false statements made in a filed complaint that the filing lawyer then republishes outside of court are not privileged. *Missner v. Clifford*, 393 Ill. App. 3d 751 (2009).

109. After filing her lawsuit, Holder republished the Sline False Statements outside of court.

110. Specifically, Holder republished the Sline False Statements on her law firm's website. Exhibit 15.

111. Holder also republished the Sline False Statements through tweets on her personal social media accounts. Exhibit 16.

112. Holder's intentional and painstaking curation in smearing Plaintiff's name across social media is shown by her editing one of her Twitter posts – which named Plaintiff and referenced the lawsuit – more than 30 times. Exhibit 17.

113. Holder's posts on her social media accounts also influenced and triggered further media coverage of her vicious lies against Readey. Exhibit 18.

114. Holder also republished the Sline False Statements in news articles discussing the complaint she filed, such as in a January 6, 2023 article in *Patch* titled: "Gender Violence Lawsuit – HFHS Grad Sues Northwestern's Readey." Exhibit 19. In the *Patch* article, after identifying Readey as the baseball player, Holder stated: "This is a complaint that seeks to end the toxic pattern in America where star student-athletes get to hide behind their elite schools and proud parents as they sexually abuse women, then intimidate and fight them when they speak out." *Id.* Holder was additionally quoted in a *Deadspin* article titled: "Northwestern baseball player sued for intentional infliction of emotional distress, violation of Gender Violence Act". Exhibit 20.

115. In Holder's republication of the Sline False Statements, Holder even published more things than what the Sline complaint contained. For instance, she included pictures of Readey. Exhibits 15-16.

116. On information and belief, Holder and agents of her law firm circulated the complaint to media outlets.

117. On information and belief, Holder and agents of her law firm contacted reporters and provided quotes “off the record” to reporters so they would print articles about her lawsuit but not quote her.

118. Holder did so because she is obsessed with promoting her career, as her advertisements make clear. Here is one recent ad of hers seeking media attention:



119. Holder was presumably later informed by a lawyer that her republications were defamatory and *not* privileged because within two months of her postings, Holder and her law firm removed their postings (despite maintaining all other postings dating back to January of 2019).

120. Ultimately, the lawsuit Holder filed for Sline was dismissed on August 14, 2023 for “want of prosecution.” Exhibit 2.

### **Readey and Doe Relationship**

121. Readey and Doe both entered NU as freshman athletes in September 2021. Readey was on the baseball team and Doe the lacrosse team.

122. Readey and Doe met at a party early freshman year at which Doe – within half an hour of meeting him – attempted to kiss Readey. When he rejected her attempts, Doe – a self-identifying bisexual – said “you must be gay” for not kissing her. Nevertheless, Doe and Readey quickly developed a friendship lasting throughout their freshman year.

123. Doe persisted in her romantic gestures and attraction towards Readey throughout their freshman year. When Readey advised he had a girlfriend, Doe proposed that he breakup and date her instead.

124. After Doe then began a relationship with a girlfriend, Doe still made unsolicited offers for Readey (and even his then-girlfriend) to join in sexual threesomes and foursomes. Readey always laughed off these overtures and maintained a platonic friendship with Doe, but he lessened his encounters with her seeking to maintain some boundaries and distance.

125. As their limited text history shows, Readey did not maintain a close friendship with Doe. Exhibit 4.

126. In the summer after their freshman year, Doe came back to NU’s campus in July 2022 for a lacrosse camp.

127. Readey had been living close to campus in Evanston for the summer as he rehabbed from recent surgery.

128. On the night of July 18, 2022, with both together on campus, Doe invited Readey over at 9:35 PM to watch a movie. *Id.* But Readey was already out with friends, so he politely declined. *Id.*

129. Doe was persistent, however, and she proceeded to text Readey another four times, specifically inviting him to come over, which solicitations extended late into the night. Her texts even included a picture of herself lying on the bed. *Id.*

130. Eventually, Readey obliged and headed over for what he thought was to watch a movie with a friend and classmate who was only in town for a few days before she headed back to her home in Florida.

131. At the time, Readey was still recovering from recent elbow surgery, so he lacked his normal strength and mobility.

132. Readey was also then happily in a committed relationship with his girlfriend and had maintained a purely platonic friendship with Doe up to that point.

133. But shortly after Plaintiff arrived, Doe climbed on top of him and whispered, “this stays between us,” before she initiated sexual contact.

134. While Readey did not halt Doe’s sudden, unsolicited, and unexpected romantic overtures, had it not been for Doe’s aggressive initiation, it never would have happened.

135. The romantic encounter initiated by Doe was brief, lasting less than an hour.

136. Though ambushed by Doe, Readey was immediately disappointed with himself afterward for not resisting Doe and regretted being disloyal to his girlfriend.

137. A few hours later, at 4:47 am, Doe initiated another text exchange with Readey:

Doe: “That was a fucked up mistake and I told [my girlfriend], just giving u a heads up. I should’ve never given you the idea that that was ok I genuinely have never regretted anything more in my life. You don’t have to tell [your girlfriend] but just letting u know I told my girlfriend.” *Id.*

Readey: “I talked to [my girlfriend].” *Id.*

Doe: “ok well it’s fucked and tell [your girlfriend] I’m so sorry and I don’t know whether it’s bc I was a weird high or just super anxious but I’m so fucking sorry.”  
*Id.*

138. As Doe’s texts to Readey immediately afterward make clear, she initiated their sexual encounter, said it was her idea, and apologized to Readey for it.

139. Because of her indiscretion, Doe’s girlfriend immediately terminated their relationship and later attempts to reconcile were short lived.

140. Hooking up with Readey effectively cost Doe her relationship with her girlfriend.

141. In contrast, Plaintiff worked things out with his girlfriend.

142. Enraged by the fact she was now single, Doe immediately lashed out at Readey writing him the next day that “you get to have your happy relationship.” *Id.*

143. Doe sought vengeance.

144. On information and belief, throughout the Fall 2022 semester (sophomore year), Doe struggled with preseason lacrosse conditioning tests and drug issues, resulting in her removal from the lacrosse team’s active roster. NU’s website does not list Doe on the 2022-2023 women’s lacrosse team. Exhibit 21

145. In the Fall 2022 semester, at a party where Readey and Doe were both present, Doe’s lacrosse teammates informed Readey that she was snorting lines of cocaine and threatening to make up allegations of sexual assault against him. After her teammates emphasized to her that doing so was not acceptable, Doe simply shrugged her shoulders and with a smug smile on her face headed outside to campus bars.

146. For months throughout the following Fall and Winter quarters, Doe harassed and attacked Plaintiff’s girlfriend through Snapchat messages in an ongoing effort to sabotage his relationship, so his relationship could end like hers had. Exhibit 21.

147. Doe also harassed Readey whenever they crossed paths, and spread the ugly, false narrative to her former teammates and other NU student-athletes that Plaintiff sexually assaulted her.

**Holder Begins to Work with Doe to further Defame and Destroy Readey**

148. On January 7, 2023, a week after Holder filed her lawsuit for Sline against Readey, Holder posted on her Instagram account a screenshot of her firm’s defamatory posting against Readey.

149. Shortly thereafter, Doe then re-posted it on her own account with the caption: “finally got what you deserve, a terrible embarrassment of a person.” Exhibit 22.

150. It is unclear whether Holder found Doe as a client or Doe found Holder as a lawyer, but either way, they soon became partners.

151. On January 10, 2023, three days after Doe re-posted Holder’s article, Doe emailed the NU Athletic Director (“AD”) and alleged sexual assault against Readey.

152. Six months had passed since she had invited Readey over and initiated her sexual encounter with him, and now – three days after seeing and reposting Holder’s message with an ugly message – Doe decided to file a complaint against Readey.

153. When Doe wrote the AD, she made clear her goal was to get Readey kicked off the baseball team, but that she does “not wish to formally report what Chad Readey has done to me.” Doe even referenced Holder’s recent “legal action” against Readey as further support or basis for NU to discipline him. Said differently, Doe was trying to link Holder’s lawsuit for Sline to her delayed complaint against Readey.

154. On January 26, 2023, Doe again reached out to the NU Athletic Director and emphasized her desire to have Readey removed from NU athletics.

155. Shortly after that, Doe and Readey crossed paths on campus, which prompted her to say to him, “have you been kicked off the baseball team yet?” She then added: “maybe you can choke and die instead.”

156. Meanwhile, Doe was not playing lacrosse, and her former teammates were beginning a season that would result in them being crowned national champions.

157. In the days and weeks following Doe’s January 26, 2023 email, the NU Title IX office made several attempts to schedule a meeting with Doe, but were met with repeated last-minute cancellations by her.

158. Then, on March 3, 2023, Doe – after a month of Title IX meeting cancellations – withdrew her complaint against Readey writing to NU’s Title IX office: “I’ve decided to not go any further with this report on Chad Readey.”

159. But then, on May 15, 2023, more than two months after Doe had withdrawn her complaint – and just as she watched her former lacrosse teammates begin rolling through the NCAA tournament on their way to a national championship – she re-initiated her Title IX complaint writing to the office: “I am emailing because I am now ready to try again to have the intake meeting related to my Title IX complaint against Chad Readey. Thank you for your patience as I work through the trauma of my sexual assault. Can you please give me the next steps and also how the investigation will be handled? Also, am I allowed to have someone with me?”

160. NU diligently and immediately then proceeded with processing Doe’s revitalized complaint.

161. As her case was reopened at her asking, Doe was now being coached on processing her false complaint. Holder was now providing her direction and was listed as her authorized “advisor” to accompany her during NU interviews.

162. During her preliminary Title IX interview in mid-June, Doe first raised the desire to seek “medical retirement” as a result of “trauma” induced by Plaintiff from her fabricated



allegations. Opportunistically this might allow Doe to remain on athletic scholarship despite not being on the active roster throughout the 2022-2023 season.

163. Once Holder got involved, Doe's (false) account of what transpired with Readey also suddenly become more detailed and more comprehensive and now included claims of sexual harassment, sexual assault, sexual battery, rape, and stalking.

164. Doe never provided NU investigators with her text exchanges with Readey showing that she initiated the sexual contact with Readey and apologized to him for doing so.

165. Holder was now leveraging her two clients – Sline and Doe – and weaponizing prior falsehoods in an attempt to provide Doe newfound leverage.

166. Doe's Title IX case has now advanced to the formal investigation stage, with her and Holder taking part in multiple investigative interviews during the first week of August 2023.

167. But Holder could not wait any longer. She smelled blood in the water from recent national headlines regarding NU's alleged football hazing – and reports of the NU baseball program's "toxic environment" – with a noticeable media backdrop of sexual misconduct.

### **Holder Files Lawsuit 2 Defaming Readey**

168. On August 9, 2023, before even exhausting the Title IX administrative process Doe had just begun – and without making any attempt to share documentation that might support her claim with investigators – Holder filed a lawsuit for Doe against NU. Exhibit 3.

169. Holder's latest lawsuit coincided with her unveiling her first billboards in Chicago that boldly boasted she is a "Women's Rights & Sexual Abuse Attorney." Exhibit 23.

170. Though Holder sued NU – not Readey – her complaint named Readey 21 times and repeated six times the falsehood that Readey has a "documented history" of sexual assaults, and again falsely portrayed him as a "sexual predator" (the "Doe False Statements," and together with the Sline False Statements, the "False Statements"). Exhibit 3.

171. Consistent with her prior practices, Holder also then immediately promoted and re-published the Doe False Statements through her firm’s website and her personal social media accounts, including:

- Falsely republishing on her social media accounts that Readey – “a baseball player” – assaulted multiple women and “admitted to the action in writing school officials.” Exhibit 24. In so doing, Holder conflated Sline’s false claims with Doe’s false claims, further placing Readey in a false light with the public.
- On her law firm website, she posted the complaint referencing Readey. Exhibit 25.
- On information and belief, Holder and members of her law firm sent the Doe complaint to reporters and media outlets and provided quotes and information “off the record” in an attempt to shield Holder and her firm from liability for defamation and other torts.

**COUNT I**  
**Defamation Per Se**  
**(ALL DEFENDANTS)**

172. Plaintiff re-asserts, re-pleads, and incorporates by reference all allegations listed above as if fully set forth herein.

173. Defendants falsely stated and inferred that Plaintiff has a documented history of being accused of, and having admitted to, “sexual assault or sexual abuse” of multiple girls and/or women, as identified in the False Statements.

174. Defendants falsely stated and inferred that Plaintiff “committed sexual violence against young women,” as identified in the False Statements.

175. Defendants falsely stated and inferred that Plaintiff was a “sexual predator,” as identified in the False Statements.

176. Defendants, without privilege or permission to do so, repeated the False Statements to third parties, including, but not limited to, indeterminate numbers of persons via internet and social media postings, and comments made and posted to media outlets.

177. Plaintiff was severely harmed by Defendants’ publication of the False Statements, including, but not limited to, damage and injury to his character and reputation in his current peer community and prospective professional community, as well as a diminishment of his future prospects for Name, Image, and Likeness opportunities as a student-athlete.

178. Defendants’ False Statements accuse Plaintiff of having committed multiple crimes.

179. Defendants’ False Statements prejudice Plaintiff in his school community.

180. Defendants’ False Statements falsely accuse Plaintiff of fornication.

181. Defendants’ publication of the False Statements has made, and continues to make, Plaintiff the victim of scorn, derision, and outcast by his peers and other acquaintances, causing injury to Plaintiff’s emotional, physical, social, and academic wellbeing both now and in the future.

**WHEREFORE**, Plaintiff, Chad Readey, seeks judgment against Defendants, and each of them, in an amount in excess of \$50,000, and for all Defendants to be immediately and permanently enjoined from making, publishing, or republishing, false and defamatory statements against Plaintiff.

**COUNT II**  
**False Light**  
**(ALL DEFENDANTS)**

182. Plaintiff re-asserts, re-pleads, and incorporates by reference all allegations contained above as if fully set forth herein.

183. Defendants made and published to third parties, without privilege, their False Statements that assert and accuse Plaintiff of vile and serial criminal and sexual conduct, placing Plaintiff in a false light before the public.

184. Defendants’ False Statements accusing Plaintiff of vile and serial criminal and sexual conduct, stating or implying likelihood of future harm to others, are highly offensive and

injurious to Plaintiff's past, current, and future character, reputation and stature in the community, and by their nature, would be highly offensive to any reasonable person.

185. Defendants' False Statements have caused special damage to Plaintiff as will be proved and established at the trial of this action.

186. Defendants made and issued their False Statements with malice in an effort to destroy Plaintiff and further their own personal business opportunities.

**WHEREFORE**, Plaintiff, Chad Readey, by and through his attorneys, seeks judgment against All Defendants, and each of them, in an amount in excess of \$50,000, and for All Defendants to be immediately and permanently enjoined from making, publishing, or republishing, false and defamatory statements against Plaintiff.

**JURY DEMAND**

Plaintiff herein demands a trial by jury of all triable issues in the present matter.

**Dated: New York, New York  
August 28, 2023**

**Respectfully submitted,**

**NESENOFF & MILTENBERG, LLP**  
*Attorneys for Plaintiff Chad Readey*

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**233 South Wacker Drive, Suite 6149**  
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Law Division Motion Section Initial Case Management Dates for CALENDARS (A,B,C,D,E,F,H,R,X,Z) will be heard In Person.  
All other Law Division Initial Case Management Dates will be heard via Zoom  
For more information and Zoom Meeting IDs go to [https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906\\_SelectTab/12](https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906_SelectTab/12)  
Court Date: 11/2/2023 9:00 AM

**EXHIBIT 1**

FILED  
8/28/2023 3:51 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2023L008661  
Calendar, H  
24146890

FILED DATE: 8/28/2023 3:51 PM 2023L008661

August 12, 2021

To Chad Readey, and Anyone Else Who Has Reason to Read It:

I write this letter as a formal retraction of a false statement I made to Northwestern University, and others, about Chad Readey.

On August 17, 2020, shortly after learning of Chad Readey's early admission to Northwestern's Class of 2025, I sent an email to Northwestern alleging that Chad Readey had been accused of sexually assaulting "more than six" female students at Homewood Flossmoor High School (HFHS), and that Chad Readey had "admitted" to these allegations. I made this claim based on information I received from another student and classmate of Chad Readey at HFHS. I have since come to learn that these allegations are false. NO students at HFHS had alleged that Chad Readey had sexually assaulted them, and Chad Readey DID NOT admit to sexually assaulting anyone. I have recently come to learn that, in fact, HFHS conducted what it considered to be an "exhaustive" investigation and found no evidence of conduct by Chad Readey considered sexual harassment or sexual assault.

Unfortunately, prior to sending my email to Northwestern, I also shared its contents with some friends. The result was that others also sent similar emails to Northwestern based on the same false information. Though I did not post it, my false statement also ended up on a Twitter account called "@NUPredators." All this has hurt Chad and threatens to put him in a false light when he joins the Northwestern community this fall.

The purpose of this letter is to take responsibility for my actions, and to demand that "@NUPredators" immediately and permanently remove the post of my August 17, 2020, email to Northwestern University. Further, I will make this demand in any additional forum in which my words may appear.

It was never my intention to spread false information, or to cause harm based on incorrect facts. While I believed my statement was true at the time I made it, I understand the importance of a retraction like this one when additional information comes to light, and I apologize for any harm that may have resulted from my original statement.

Signed:

AV

AV

Homewood Flossmoor High School Class of 2020

**EXHIBIT 2**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Doe

v.

Chad Readey

No. 2022 L 11495

Judge Maureen O. Hannon

AUG 14 2023

Circuit Court - 2169

ORDER

This cause coming to be heard before the Honorable Maureen O. Hannon for interim case management, Counsel for defendant Chad Readey being present, Plaintiff's counsel being absent, and with the Court properly advised on the premises, IT IS HEREBY ORDERED:

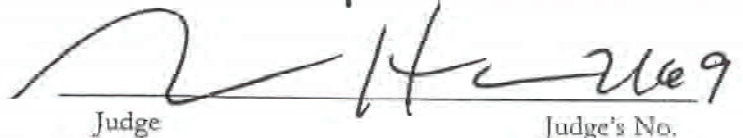
4020  
4251

1. The case is dismissed for want of prosecution; and,
2. Defense counsel shall mail this order to Plaintiff's counsel, Tamara Holder within 7 days.

Attorney No.: 6308777  
 Name: Colin Quinn Commito  
 Atty. for: Chad Readey  
 Address: 140 S. Dearborn St, Suite 620  
 City/State/Zip: Chicago, IL 60603  
 Telephone: 312.262.2900  
Commito@Mordeson-parks.com

ENTERED:

Dated: 8/14 2023

  
Judge Judge's No.

FILED DATE: 8/28/2023 3:51 PM 2023L008661



**EXHIBIT 3**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JANE DOE,	)	
	)	
Plaintiff,	)	
	)	Case No.
v.	)	
	)	
NORTHWESTERN UNIVERSITY, and	)	Trial by Jury Demanded
NORTHWESTERN UNIVERSITY BOARD OF	)	
TRUSTEES,	)	
	)	
Defendants.	)	

**COMPLAINT AND JURY DEMAND**

NOW COMES the Plaintiff, JANE DOE, by her undersigned attorneys, The Law Firm of Tamara N. Holder, LLC, Fish Potter Bolaños, P.C., and Lubin, Austermuehle, P.C., and in support of her Complaint against NORTHWESTERN UNIVERSITY, and NORTHWESTERN UNIVERSITY BOARD OF TRUSTEES (collectively “Northwestern”), states as follows:

**INTRODUCTION**

1. Northwestern University is a prestigious, private institution with an endowment of over 15 billion dollars.<sup>1</sup> To compete for the best students, Northwestern advertises a "commitment" to providing students with a safe environment away from home.

2. Northwestern's statements are a farce, and Jane Doe seeks to hold Northwestern University and its Board of Trustees accountable for its systemic institutional misconduct.

3. In July 2022, Plaintiff Jane Doe is an All-American, Northwestern lacrosse player who was sexually assaulted by Northwestern baseball player Chad Readey.

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<sup>1</sup> A Senate Report found that only 17.2% of for-profit schools’ revenue was spent on instruction, less than the amount allocated for marketing, advertising, recruiting, and admissions staffing, and less than the amount generated as profit. [For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success](#) (July 30, 2012)

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4. Northwestern could have prevented Jane Doe's sexual assault but intentionally failed to protect her: Two years prior (August 2020) to her sexual assault (July 2022), at least *seven* current and former classmates of then-incoming freshman-athlete Chad Readey, warned Northwestern (including then-President Morton Schapiro, then-Head Baseball Coach Allen Spencer, and other university officials), that he had a documented history as a serial, sexual abuser towards his female classmates throughout middle school and high school. They warned Northwestern that Readey's unchecked conduct could result in additional harm to female students at Northwestern.

5. Rather than take measures to protect Jane Doe, and other students, from Chad Readey - as obligated by federal law and its own student handbook - Northwestern instead ignored the warnings, and admitted him anyway.

6. Additionally, Northwestern aligned itself with Readey and his parents, sharing the complaints with them, and then admitting Readey to the university to play on its baseball team.

7. Further, Northwestern actively worked to cover-up the allegations, in the event they became public, and even prepared a written statement in defense of its decision to admit Readey.

8. Meanwhile, at the same time, Jane Doe was enrolling in her freshman year Northwestern, as an All-American lacrosse player. She did not know Readey whatsoever, nor did she know about Readey's history as an accused, serial, sexual abuser of his classmates.

9. Upon her enrollment at Northwestern, Jane Doe blindly built a platonic friendship with Readey. Readey sold himself to her as a trusted "brother." Had Jane Doe known about Readey's documented past, she would not have associated with him, let alone hang out with him in a one-on-one setting.

10. Then, on the night of July 18, 2022, Readey sexually assaulted Jane Doe, while she was in town for a lacrosse summer camp with her Northwestern team.

11. In January and February 2023, Jane Doe complained to both Athletic Director Derrick Gragg and Northwestern's Title IX Office. They turned a blind eye.

12. Plaintiff Jane Doe brings this action against Northwestern for negligence, and violation of her rights under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.* (“Title IX”) and state law claims.

### **PARTIES**

13. Plaintiff Jane Doe<sup>2</sup> is a citizen of the State of Florida and student athlete at Northwestern University.

14. Defendant Northwestern University (“Northwestern”) is a private university with its principal place of business in Evanston, Illinois. Northwestern is a recipient of federal funds within the meaning of 20 U.S.C. § 1681(a).

15. Defendant Northwestern University’s Board of Trustees (“Board of Trustees”) is Northwestern’s governing body with its principal place of business in Evanston, Illinois. The Board of Trustees consists of six officers and no more than thirty-six members. At all times relevant, “the President of the University shall be an Ex Officio Trustee entitled to attend all meetings of the Board of Trustees and its Committees.” The Board of Trustees “shall establish policies for the governance of the University and shall be responsible for the management of the University in a manner that upholds its mission and assures its continued ability to fulfill such a mission.”

### **JURISDICTION AND VENUE**

16. This Court has federal question subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because this litigation involves claims arising under the laws of the United States, namely Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681-1688.

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<sup>2</sup> In filing this Complaint, Jane Doe also filed a Motion to Proceed Under Pseudonym in order to protect her identity and privacy as a sexual assault victim, as well as to protect her from future harm.

17. In addition to federal question subject matter jurisdiction, this Court has diversity jurisdiction over this matter pursuant to 28 U.S.C. § 1332: (1) Plaintiff is a citizen of the State of Florida, and Defendants are citizens of the State of Illinois; and (2) the amount in controversy exceeds \$75,000.

18. This Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367(a).

19. Venue is proper under 28 U.S.C. § 1391(b) because the events giving rise to this Complaint occurred within this District.

### **FACTUAL ALLEGATIONS**

#### **Chad Readey's Documented History of Habitual, Sexual Misconduct**

20. Chad Readey's documented, sexual misconduct towards girls dates back to at least middle school, when he was a student at Parker Junior High School, Flossmoor School District 161, located in Flossmoor, Illinois.

21. In 2016, one of Readey's middle school teachers reported a "major" incident to school administration after she observed Readey "hit" a girl on her buttocks.

22. In response, Readey's mother told his teacher she was "working with Chad on the flirting with girls issue." Composite Exhibit A includes (1) an Affidavit from Readey's middle school teacher, (2) Readey's mother's response to the incident (recognizing since she received "one email and three calls with a short time period, it's probably good to sit down"), (3) and the school's internal incident report.

23. Readey's unwelcome, sexually abusive misconduct towards young women continued into his high school years, when he was a student at Homewood-Flossmoor High School ("HFHS").

24. In high school, Readey was the subject of multiple, student complaints of sexual misconduct. During his sophomore year (2018-2019), Readey grabbed a female student's breast on a school bus, after she told him to stop touching her.

25. In January 2020, during his junior year, Readey admitted to Homewood-Flossmoor officials in writing that he did, in fact, grab the female student's breast.

26. Prior to the incident on the school bus, Readey engaged in habitual, sexual harassment and unwelcome touching of this same female student, often times in an open classroom setting. For example, he asked if he could "finger" her; he regularly touched her inappropriately; he unzipped her hoodie to see if she was wearing anything underneath; and he told when he has sex with girls, he "prefers them to be quiet, to take it, and not to moan or make other noise." When Readey engaged in this conduct towards the then-15-year-old student, she would tell him to stop or show her disapproval.

27. Eventually, HFHS "investigated" complaints about Readey from other students. Even though Readey admitted, in writing, to grabbing the female student's breast, and other unwelcome conduct, HFHS did nothing but engage in "Restorative Conversation" with Readey. Exhibit B is HFHS's log entry related to the investigation.<sup>3</sup>

**Northwestern Receives Multiple Warnings  
About Readey's History of Sexual Misconduct**

28. On or around August 2020, Readey posted on social media that he had committed to attend Northwestern, and would be joining the baseball team, beginning in Fall 2021.

29. *Following his announcement, Readey's HFHS classmates immediately contacted Northwestern's then-President Morton Schapiro, then-Head Baseball Coach Spencer Allen, and*

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<sup>3</sup> HFHS has a history of ignoring student complaints, including complaints about sexual misconduct and harassment. In March 2022, hundreds of students staged at least two walkouts "due to concerns over alleged sexual assault and harassment between students," and were "fed up with how HFHS [was] handling allegations of sexual assault and harassment. Fox 32 Digital Staff, [Hundreds of Homewood-Flossmoor students stage walkout over alleged sexual assault, harassment claims](#), Fox 32 Chicago, (March 16, 2022); and, Shanzeh Ahmad, [Homewood-Flossmoor students to hold second walkout over alleged sexual assault, harassment between students](#), Chicago Tribune, (March 19, 2022)

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*other school officials, warning the administration that Readey had a documented, unchecked history of unwanted sexual misconduct in both middle school and high school.*

30. On August 17, 2020, Classmate Liz Carrick emailed Coach Allen, stating in part:

Hi! You recently admitted Chad Readey, a student from Homewood-Flossmoor to pursue his academic college career at Northwestern. I would like to bring to your attention that this student has sexually assaulted multiple women during his middle school and high school career. ***I experienced this first hand when I was 12 years old, but never reported it because I was unaware of what sexual assault even was at the time.*** Last school year, over six girls went to the school administration, SEPARATELY, to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions...I just wanted to inform you of these incidents, and help you become aware of the type of student athlete that you are admitting into your school. (Exhibit C)

31. On August 17, 2020, Classmate Victoria Olaleye emailed President Schapiro and Coach Allen, stating in part:

...as someone who has gone to school with him for seven years now, ***I don't think that this is the smartest nor safest decision you all can make. Chad Readey has a horrible and long record of sexually harassing and sexually abusing girls.*** The list of names unfortunately is very long. And this has happened since we were younger. He has never been penalized for it even though it has been brought to Homewood-Flossmoor High School's attention (you can ask the school for more information). As a result, many girls at our school, girls that I'm friends with or have spoken to have been let down and ***walk around in antagonizing fear.*** I know that your school prides yourself on its student life and safety of your students. ***I am sorry to say that if you let him on to campus or the field, many more lives can be fatally affected...*** (See Exhibit C)

32. On August 17, 2020, Classmate Kai Offett emailed six (6) different Northwestern officials about Readey's "alarming sexual assault allegations," stating in part:

I was recently made aware of a new student/baseball recruit for Northwestern University named Chad Readey that currently is a senior at Homewood Flossmoor High School. I was immediately alarmed at this announcement, as this student

has multiple alarming sexual assault allegations. Northwestern University is an extremely prestigious institution, and I'm sure that as such you would not want an incoming student with such allegations, nevertheless those allegations being confirmed on multiple occasions...He has multiple allegations of sexual assault from middle school throughout his high school career...There have been 7 more who have reported their instances of being assaulted to Homewood Flossmoor Administration, in each of which no action has been taken on behalf of Homewood Flossmoor's baseball team or the institution itself. ***I am emailing to ask that you seriously reconsider and immediately rescind your offer to Chad Readey as a baseball commit and as a student. Sexual Assault victims deserve to be believed and I genuinely believe that this student is a threat to other incoming students at your university.*** (See Exhibit C)

33. On August 17, 2020, Camille Willis messaged Northwestern, stating:

I go to school with Chad and have gone to school with Chad since seventh grade. In the time I've known him I've talked to several girls who tell similar stories of being sexually assaulted by him. ***We've gone to our school administrators but he's never gotten more than a slap on the wrist. I just wanted to make sure you all were aware of the type of person you're admitting.*** (See Exhibit C)

34. On August 17, 2020, Keeley Stanciel and Matthew Hommer individually sent this message to the "Undergraduate Admissions" email address, stating:

...I feel as if I should bring it to your attention that [Chad Readey] has had multiple sexual assault allegations against him. Close friends of mine have reported abuse dating back to junior high...Since then six more girls have separately come forward to Homewood-Flossmoor's administration about Chad sexually assaulting them. ***The administration brushed each of these allegations under the rug despite Chad admitting to his actions.*** I am certain that this is not the kind of student or athlete you want representing your school. (See Exhibit C)

35. On August 19, 2020, the @NuPredators Twitter account – a social media outlet devoted to addressing “rape, assault, trauma, sexual violence” at Northwestern – received a post that



“over 6 girls” went to high school administration “to report their own sexual assault experiences” against Readey. Northwestern was aware of this posting.

36. On August 19, 2020, then-Assistant Director of Undergraduate Admissions Mauricio Gonzalez emailed Director of Undergraduate Admissions Dr. Liz Kinsley, and Senior Associate Director of Admission & Director of Communication and Audience Engagement Andrew Linnehan, stating he received private messages on Northwestern’s Instagram and Facebook accounts with allegations about Readey. He further stated:

*...I have not told anyone else besides you both of these messages, and I have not responded to these messages either...These allegations are very serious, and I wanted to bring this to your attention as soon as I could... (Exhibit D)*

37. Indeed, Northwestern disregarded the warnings, did not warn other students about them, and then welcomed Readey into the Northwestern community.

38. Additionally, Northwestern top brass actively engaged in an effort to protect itself and Chad Readey from any negative publicity, should it arise.

39. On November 7, 2020, Northwestern Vice President for Global Marketing and Communications John Yates, along with other Northwestern officials, drafted a statement to release if the public became aware of the university admitting Readey despite its knowledge of his documented history of sexual misconduct in middle school and high school.

40. Northwestern also actively worked with the Readey family, in an effort to protect him, too: Northwestern shared the messages with the Readey family, who, in turn, used the identities of the concerned students to threaten, intimidate, and ultimately sue several of those students.

**Northwestern’s Intentional Failure to Protect Jane Doe**

41. Jane Doe was raised in Florida, where she was an All-American lacrosse player.

42. Northwestern recruited Jane Doe to play on its lacrosse team, using false and misleading representations, namely, that its athletic department was inclusive and safe, and that she would be protected by the institution if she attended the university.

43. For example, during Jane Doe's recruiting trips, in September 2019, and again in July 2021, Northwestern officials gave Jane Doe and her family a tour of the school and athletic facilities and told her, among other things, that she would be safe at the school.

44. Believing that she was attending a safe institution, Jane Doe chose to attend Northwestern, as an All-American lacrosse player, in Fall 2021. She felt proud, honored, valued, and protected.

45. Upon enrolling at Northwestern, Jane Doe relied on Northwestern's student handbook that stated, in part:

Northwestern is committed to fostering an environment in which all members of our community are safe, secure, and free from prohibited harassment, discrimination and sexual misconduct in any form. When learning of conduct or behavior that may not meet these standards, community members and the University are expected to take an active role in upholding this policy and promoting the dignity of all individuals.

46. Jane Doe also relied on communications from the Athletic Department. For example, on October 20, 2021, Athletic Director Derrick Gragg sent an email to the student-athlete community, stating in part:

...Northwestern Athletics & Recreation is built upon a foundation intent on making every Wildcat feel safe, supported and capable of pursuing their goals...

47. Jane Doe enjoyed her freshman year academically, athletically, and socially. Early on, she and Readey quickly became friends and she found him to be simpatico, as a fellow Black athlete in a predominantly white school. Their relationship was platonic. Jane Doe was not sexually attracted to Readey in any way, whatsoever.

48. In June 2022, Northwestern hired Jim Foster as its new baseball head coach, including to lead an example for Readey.

49. On July 18, 2022, Jane Doe returned to Northwestern for a lacrosse summer camp, and staying at a home rented by members of the lacrosse team.

50. Desiring to stay home for the night, she invited Readey over to watch a movie. Jane Doe gave Readey no indication that she was interested in him sexually. Readey knew that Jane Doe had a girlfriend.

51. Within minutes of starting the movie, Readey began to touch, then kiss Jane Doe's body. She rejected his advances, but he continued. He took off her pants and underwear against her will and put his mouth on her vagina. He tried to put his penis in her vagina, then he forced her to touch his penis. He ejaculated on her body, went to the bathroom to clean up, and left.

52. During her sexual assault, Jane Doe repeatedly told Readey to stop but he refused.

53. Following Jane Doe's sexual assault, Readey began to stalk her at parties at the lacrosse house. Readey came to the house, even after Jane Doe instructed him to stay away. He also refused to leave the premises on multiple occasions, despite being asked to leave by Jane Doe and her teammates.

54. Following her sexual assault, Jane Doe became depressed and withdrawn. She became afraid, in an environment where she previously felt safe. She struggled with attending classes, and her grades declined. She lost her desire to play lacrosse, a sport she played for her entire life.

**Jane Doe Reports Her Sexual Assault  
to Northwestern Athletics and Title IX**

55. On or about January 10, 2023, Jane Doe reported the sexual assault to the Director of Athletics Derrick Gragg ("Gragg"). She told Director Gragg, among other things, that she was "a direct victim of Chad Readey's disgusting behavior." She expressly asked for help from the leader of the Northwestern athletic community. "I am asking the athletic administration to uphold and exercise those values Northwestern Athletics is associated with," she stated.

56. After failing to respond, Jane Doe emailed Gragg again.

57. Finally, on January 26, 2023, Gragg replied. He stated, in part:

First, let me sincerely apologize for the time it has taken me to respond. As you hypothesized, I did not see your email from January 10th...once again, I thank you for your outreach and for bringing this matter to our attention. We are committed to maintaining an environment in which community members feel safe, welcomed, and affirmed.

58. On February 1, 2023, Jane Doe reported her sexual assault to the Title IX office, without any assistance of, or support from, the Athletic Department.

59. According to Northwestern's [Interim Title IX Policy on Sexual Harassment](#):

At any time after receiving a report of Title IX sexual harassment, the university may remove a student respondent from the university's education programs and activities on an emergency basis if an individualized safety and risk analysis determines that an immediate threat to physical health or safety of any student or other individual arising from the allegations of Title IX Sexual Harassment justifies removal.

60. Northwestern's [Policy on Institutional Equity](#) has the same abovementioned statement.

61. And yet, despite now having yet another complaint about Chad Readey, this time from a Northwestern student, Northwestern did absolutely nothing to determine if Readey was "an immediate threat to physical health or safety of any student." Just as it had with Readey's former classmates' complaints, Northwestern ignored Jane Doe's report as well.

62. According to [Northwestern's Comprehensive Policy on Sexual Misconduct](#), it "prohibits all forms of sexual misconduct" including:

"Sexual penetration without consent: Any penetration of the sex organs or anus of another person when consent is not present; any penetration of the mouth of another person with a sex organ when consent is not present; or performing oral sex on another person when consent is not present. This includes penetration or intrusion, however slight, of the sex

organs or anus of another person by an object or any part of the body."

63. Finally, in May 2023, Jane Doe filed a formal complaint with Northwestern. She has dropped out of lacrosse, depriving her of the opportunity to participate in the school's historical national championship win.

64. In July 2023, Northwestern fired Head Baseball Coach Jim Foster, following reports that he made inappropriate comments about a female staff member, was being investigated by human sources, and had engaged in other "bullying and abusive behavior."<sup>4</sup>

65. Chad Readey is still enrolled at Northwestern, and an active member of its baseball team.

66. Derrick Gragg is also still at Northwestern, as the Vice President for Athletics and Recreation. He, too, has faced demands that he resign from his post.<sup>5</sup> His 2015 book called women 'Man's Greatest Distraction,'<sup>6</sup> and referenced videos of women as "booty-shaking sex-kittens."<sup>7</sup>

67. In an effort to influence public opinion, following the firing of Coach Foster, Northwestern - via Gragg - issued a public statement to media, falsely stating:

***Nothing will ever be more important to Northwestern than providing its students a place that allows them to develop in the classroom, in the community, and in competition at the absolute highest level, and building a culture which allows our staff to thrive.***

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<sup>4</sup> Jonathan Bullington, [Northwestern dismisses Jim Foster as head baseball coach amid controversy](#), Chicago Tribune, (July 13, 2023)

<sup>5</sup> Ignacia Dowling, [Op-Ed: Derrick Gragg needs to speak to the Northwestern community, or step away from it for good](#), insidenu.com, (July 11, 2023); and, Steve Greenberg, [On list of Northwestern questions still unanswered: Where is AD Derrick Gragg's leadership?](#), Chicago Sun Times, (July 15, 2023)

<sup>6</sup> Nick Selbe, [Northwestern AD Faces Criticism for 2015 Book Calling Women 'Man's Greatest Distraction.'](#) SI.com, (July 25, 2023)

<sup>7</sup> Angie Leventis Lourgos, [Northwestern AD Derrick Gragg, under scrutiny for hazing scandal, offers questionable advice about women — 'man's greatest distraction' — in book](#), Chicago Tribune, (July 25, 2023)

**COUNT I**  
**Violation of Title IX, 20 U.S.C. § 1681, et seq.**  
**Deliberate Indifference**  
**(Defendants Northwestern University and Board of Trustees)**

68. Plaintiff incorporates all prior allegations as if fully stated herein.

69. At all relevant times, Defendants Northwestern University and Board of Trustees were federal fund recipients within the meaning of Title IX of the Education Act of 1972, 20 U.S.C. § 1681(a), *et seq.*

70. Defendants Northwestern University and Board of Trustees owed a duty to Plaintiff to provide and ensure an education environment free of sex discrimination and sexual harassment, and to enforce the regulations, rules, and laws necessary to protect Plaintiff from acts of sex discrimination and sexual harassment.

71. Plaintiff, a Northwestern student, was sexually assaulted by Chad Readey, also a Northwestern student, on or about July 18, 2022.

72. Defendants had actual notice that there was a substantial risk that Readey would sexually assault female students no later than on or around August 17, 2020, when it received credible reports that Readey had a documented history of engaging in repeated sexually assaults of numerous female students in high school and grade school.

73. Defendants were deliberately indifferent to the actual notice that Readey had repeatedly sexually assaulted female students over the course of several years in the educational setting and the substantial risk that he would similarly sexually assault other female college students.

74. Through its acts and omissions, Defendants acted with deliberate indifference to the actual notice it received concerning Readey by, among other things:

- a. Failing to protect Ms. Doe from Chad Readey;
- b. Failing to take meaningful measures to prevent Chad Readey from sexually assaulting female students;

- c. Failing to investigate Chad Readey; and,
- d. Failing to conduct a Title IX investigation of Chad Readey.

75. Defendants' response to the actual notice it received concerning Readey was clearly unreasonable in light of the known circumstances.

76. As a direct and proximate result of Defendants' action, inaction, and deliberate indifference, Plaintiff Jane Doe was sexually assaulted and raped by Readey.

77. The sexual assault suffered by Plaintiff Jane Doe was so severe, pervasive, and objectively offensive that it deprived her of access to the educational opportunities or benefits provided by the school.

78. By its action and inactions, Northwestern University acted with deliberate indifference toward the right of Plaintiff to a safe and secure education environment, thus materially impairing Plaintiff's ability to pursue her education at Northwestern in violation of the requirements of Title IX.

WHEREFORE, Plaintiff seeks entry of judgment and an award of compensatory damages, plus interest, attorneys' fees and costs, punitive damages, and any other relief that this Court deems appropriate.

**COUNT II**  
**Violation of Illinois Uniform Deceptive Trade Practices Act**  
**815 ILCS 510/1 et seq. -- Deception**  
**(Defendants Northwestern University and Board of Trustees)**

79. Plaintiff incorporates all prior allegations as if fully stated herein.

80. Defendants Northwestern and Northwestern's Board of Trustees made numerous oral and written material misrepresentations to Jane Doe, in an effort to deceive her into trusting Northwestern was a safe educational institution free from sexual harassment, and ultimately choosing to attend Northwestern, pay its tuition and play on its lacrosse team. These misrepresentations included as alleged in paragraph 45 above in the student handbook that Northwestern was contractually obligated to provide a safe environment free of harassment and discrimination.

Defendants also omitted to disclose to Plaintiff and other students that Northwestern had admitted Readey without an adequate investigation and without taking measures to protect Plaintiff and other students from Readey as contractually obligated in the student handbook.

81. Northwestern made these false statements and omissions knowing they were not true as it has admitted Readey having been warned he was a sexual predator. It thus engaged in a mass breach of its own student handbook and the contractual promise to its students to maintain a safe environment free of discrimination and harassment.

82. Section 2 of the Illinois Consumer Fraud and Deceptive Business Practices Act (“Consumer Fraud Act”), 815 ILCS § 505/2, provides in relevant part:

Unfair methods of competition and unfair or deceptive acts or practices, including but not limited to the use or employment of any deception, fraud, false pretense, false promise, misrepresentation or the concealment, suppression or omission of any material fact, with intent that others rely upon the concealment, suppression or omission of such material fact, or the use or employment of any practice described in Section 2 of the “Uniform Deceptive Trade Practices Act,” approved August 5, 1965, in the conduct of any trade or commerce and hereby declared unlawful whether any person has in fact been misled, deceived or damaged thereby.

83. Section 10a of the Consumer Fraud Act, 815 ILCS § 505/10a further provides:

Any person who suffers actual damages as a result of a violation of this Act committed by any other person may bring an action against such person. The court, in its discretion may award actual damages or any other relief which the court deems proper.

84. The misconduct alleged occurred in the conduct of trade or commerce within the meaning of Section 1(f) of the Consumer Fraud Act because it occurred in the advertising, offering for sale of services by Northwestern in making misrepresentations and omissions of material fact as alleged herein including in its student handbook to induce students to attend and pay tuition.



85. Plaintiff is a person within the meaning of Section 1(c) of the Consumer Fraud Act because she is a consumer within the meaning of Section 1(e) of the Consumer Fraud Act, because she purchased education services from Northwestern.

86. Defendants' misrepresentations and omission of material fact as to Readey and its policies and procedures for maintaining a safe environment as alleged in paragraph 45 and in this Court were material to Plaintiff's decision to attend Northwestern and pay tuition. She would never have attended Northwestern if she had known that it had engaged in the misconduct in allowing Readey to attend and had taken no adequate measures to warn and protect her and other female students as obligated by the student handbook and its other representations to her during the recruitment process.

87. As a direct and proximate result of Defendants' misrepresentations and omissions, as alleged above, Plaintiffs suffered damages in paying tuition and the injuries and stress from a sexual assault and battery.

88. Defendants' material misrepresentations and omissions alleged herein were willful and wanton thus allowing for a punitive damage award.

WHEREFORE, Plaintiff seeks entry of judgment and an award of compensatory damages, plus interest, attorneys' fees and costs, punitive damages, and any other relief that this Court deems appropriate.

**COUNT III**  
**Illinois Consumer Fraud and Deceptive Business Practices Act**  
**815 ILCS 505/1 et seq. – Unfair Practice**  
**(Defendants Northwestern University and Board of Trustees)**

89. Plaintiff incorporates all prior allegations as if fully stated herein.

90. Northwestern's conduct in systematically refusing to provide a safe environment as contractually obligated in its student handbook is a mass breach of contract, as to all its students, including Plaintiff.

91. Northwestern's systematic violations of its own policies and procedures and the representations in its student handbook as alleged in paragraph 45, violates federal and state public policy, including Title IX, requiring Northwestern protect its students and to provide a safe, discrimination and harassment free environment.

92. It was also immoral, unethical, oppressive and unscrupulous for Northwestern to breach the promise in its handbook and allow Readey to enroll and/or to allow Readey to enroll without taking adequate precautionary measures to protect Plaintiff and other students.

93. As a direct and proximate result of Defendants' unfair conduct, as alleged above, Plaintiff suffered damages in paying tuition and injuries and stress from a sexual assault and battery.

94. Defendants' unfair practices and mass breach of contract alleged herein were willful and wanton thus allowing for a punitive damage award.

WHEREFORE, Plaintiff seeks entry of judgment and an award of compensatory damages, plus interest, attorneys' fees and costs, punitive damages, and any other relief that this Court deems appropriate.

**COUNT IV**  
**Negligence**  
**(Defendants Northwestern University and Board of Trustees)**

95. Plaintiff incorporates all prior allegations as if fully stated herein.

96. Defendants Northwestern University and the Board of Trustees had a duty to discipline, supervise, and protect the physical safety of its student athletes.

97. Defendants breached their duty to Plaintiff Jane Doe, in one or more of the following ways:

- a. Defendants knew or should have known that, by allowing Chad Readey to attend Northwestern, acts of sexual assault and/or sexual battery against female Northwestern students could occur;

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- b. Defendants knew or should have known that Chad Readey had perpetrated previous acts of sexual assault against female classmates, and that by failing to supervise and/or discipline him, such acts would continue to occur;
- c. Defendants knew or should have known that their failure to properly supervise and/or discipline Readey posed a high probability of harm to female students, including Plaintiff Jane Doe;
- d. Defendants acted with reckless indifference or conscious disregard to the credible reports and evidence it received regarding Readey's history of committing sexual assault against female classmates;
- e. Defendants recklessly or consciously disregarded the substantial risks posed by not properly supervising and/or disciplining Readey; and,
- f. Defendants were otherwise willful and wanton in their conscious disregard of the safety of Plaintiff Jane Doe.

98. Defendants' actions and omissions constitute willful and wanton misconduct.

99. As a direct and proximate result of these willful and wanton acts and/or omissions, Plaintiff Jane Doe suffered a sexual assault and rape that caused severe emotional distress.

WHEREFORE, Plaintiff seeks entry of judgment on her behalf and against Defendants Northwestern University and Northwestern University's Board of Trustees for all damages and relief allowed by law.

**JURY TRIAL DEMANDED**

Plaintiff hereby demands a trial by jury.

Dated: August 9, 2023

Respectfully submitted,

**PLAINTIFF JANE DOE**

  
\_\_\_\_\_  
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One of Plaintiff's Attorneys

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**EXHIBIT 4**

FILED DATE: 8/28/2023 3:51 PM 2023L008661



iMessage  
Oct 7, 2021 at 7:14 PM

This is Chad

I'm going thrift shopping with you guys Saturday

Hello chad

Ok :)

Oct 9, 2021 at 3:05 PM

are u in ur dorm

I'm w my brother and want him to meet u and [redacted]

Our game just ended

We've got team dinner rn

Ok then after

Oct 23, 2021 at 9:00 PM

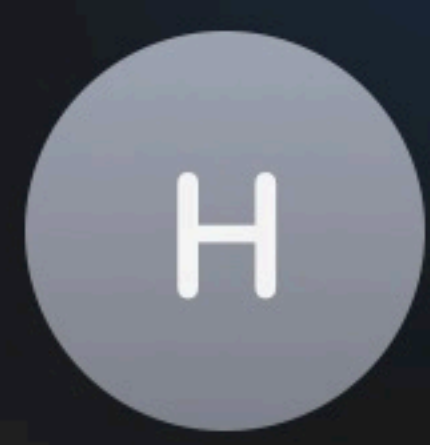
Wait for us in the lobby

I'm walking

[redacted] is making us go

Just catch up

< 613



Helaina >



Just catch up

How far r u

on Sheridan

just come to zoo

u know the Addy right

Yeah

I see u guys slow down

Actually kinda know the addy

Ok perf

I'll just see u there

Oct 24, 2021 at 7:27 AM

You free to get lunch or something today?

Something weird happened last night and ur kinda the only person that would understand

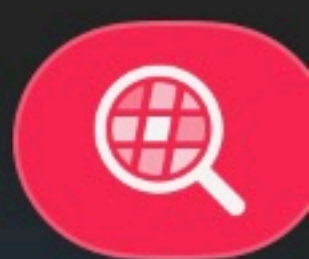
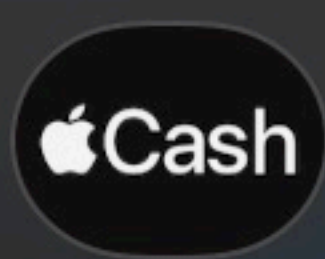
Of course ❤️

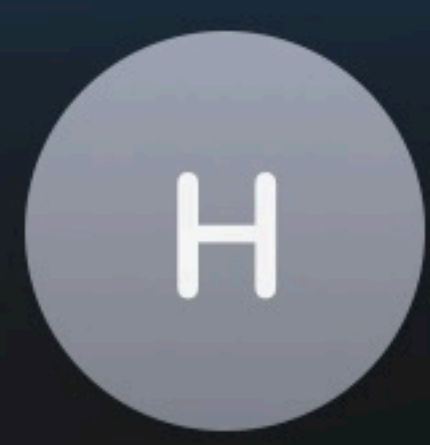
Text me when we

Oct 24, 2021 at 10:23 AM



iMessage





Oct 24, 2021 at 10:23 AM

do u like poke? Bc I need to go to target but also am craving poke we can do both if ur down

Never had poke before what is it

HA

like rice sushi fish or shrimp or chicken or crab and then toppings

like sushi in a bowl

or like Asian chipotle

Ok sure

ok like 1?

Yeah where do you wanna meet

we can uber if u want Bc walking 🙄



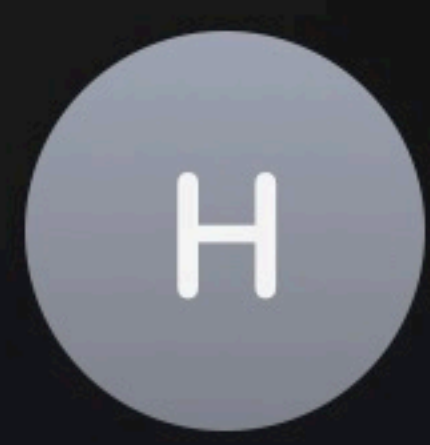
like just Lincoln?

Walking isn't that bad to me but ok 😭

maybe walk there and Uber back



< 613

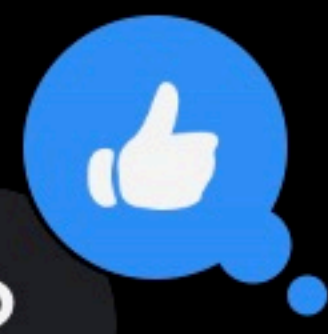


Helaina >



Yeah where do you wanna meet

we can uber if u want Bc walking 🙄



like just Lincoln?

Walking isn't that bad to me but ok 😭

maybe walk there and Uber back

Solid

Bc I don't want to walk back w my bags

ok good

yay

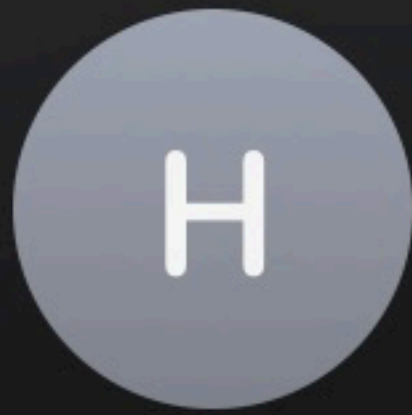
Oct 24, 2021 at 11:46 AM

Let's actually do 3 or 4 Bc I want to get some work done

Solid

Oct 24, 2021 at 3:02 PM

let's just Uber to target at 4 bc it's raining and cold



Oct 24, 2021 at 3:02 PM

let's just Uber to target at 4 bc it's raining and cold

and no poke if that's ok I just realized I have more work

but still tell me the stuff like at targ

Yea I'm about to go hang out eith my parents got a little and I've already eaten

ok perf just text when ur back/ want to go

like no rush

we can do 5



Oct 25, 2021 at 8:05 PM

What in the hell boi

do we have to be nice

I'm not going to be

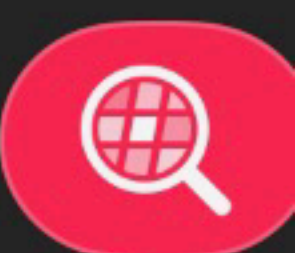
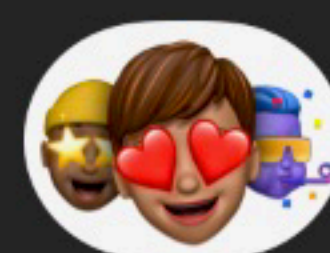
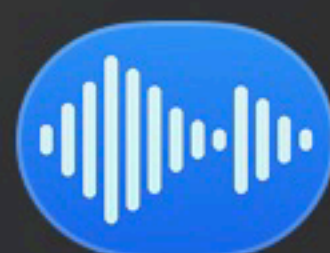
Oct 28, 2021 at 12:36 PM

When's [redacted] get here

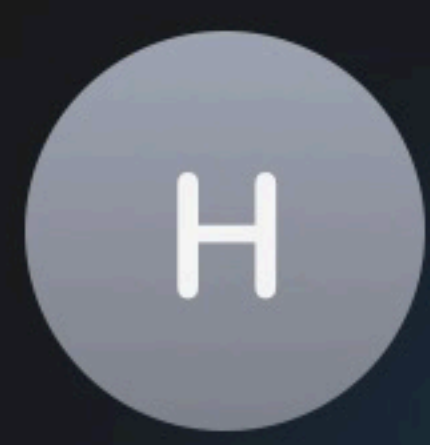
tonight at like 6?



iMessage



< 613



Helaina >



tonight at like 6?

we're going to dinner but before I want to bring her around and just meet everyone on campus

if u are w [redacted] and want to meet her^

Oct 29, 2021 at 10:34 AM

CAN I BORROW BASKETBALL SHORTS

for Halloween costume

I'm running out of shorts

Come to my room at like 12

I can come at 12:30

I have a meeting

or can u leave them in mine

[redacted] is there

I'll give [redacted] an extra pair for you

Or I can do thag

Can u just leave them w [redacted] pls bc I'm going back before practice

< 613



Helaina >



Can u just leave them w [redacted] pls bc I'm going back before practice

THANKS

love u

King



Oct 30, 2021 at 5:50 PM

Can you splatter paint me

Need to make it looks like I got stabbed

what.

when

yes

Julius Caesar costume

I'm washing the costume rn so like 30 mins?

yea

You in Lincoln

Yea



iMessage





Yea

?

Solid

I'm leaving for dinner in 30 tho so just quick

Right yeah I'll check how long it's got left

Fancy dinner?

yes 😏 😏

Nov 4, 2021 at 8:46 PM

Wave to me

Nov 8, 2021 at 6:39 PM

You still sick?

yea I have the flu but I'm feeling better

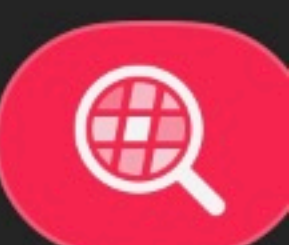
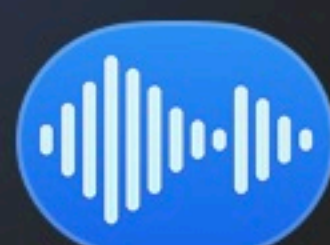
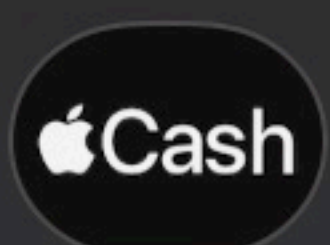
Ah

There's a black athlete thing

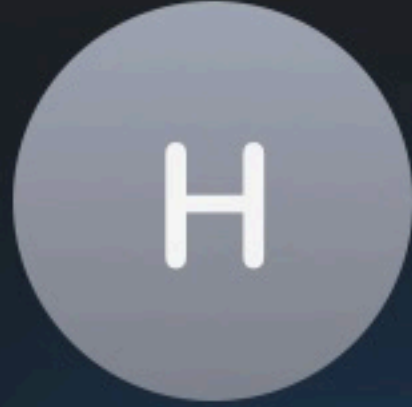
But don't come contaminate me



iMessage



< 613



Helaina >



But don't come contaminate me

Ugh I wish I could come



yes I know dear NEVER

take [redacted] or [redacted]

[redacted] here

Nov 17, 2021 at 5:28 PM

sis only has a brush one so it won't dry ur shoes correctly

Nov 21, 2021 at 10:00 PM



ready in 15

Coming to urs

COME

IM HEADING THETE NOW

Nov 22, 2021 at 1:00 AM

You guys still awake?

Nov 22, 2021 at 7:20 AM

iMessage input field with camera, microphone, and app icons

< 613



Helaina >



Nov 22, 2021 at 7:20 AM

Nope what was up

Nov 22, 2021 at 9:19 PM

can I borrow [redacted] scooter

Need to go to library

ask him for me

I just did

ok lmk

Nvm using [redacted]

Aight

Dec 26, 2021 at 7:06 PM

hey how are u

when do u go back

miss u buddy :/

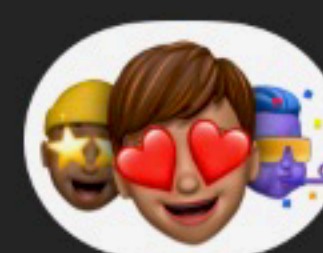


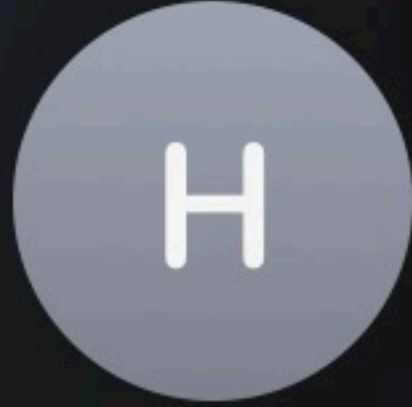
Helainaaa

I'm pretty sure I go back the first what about you?



iMessage





I'm pretty sure I go back the first what about you?

i go back the 2nd

Jan 7, 2022 at 11:07 AM

happy birthday <3

Thanks 🧡🧡

Jan 13, 2022 at 6:14 PM

U coming tonight?

[redacted] bday?

yes

Yeah I'm gonna stop by for a little bit not stay cuz we've got 7am lift

aw

Well ok good

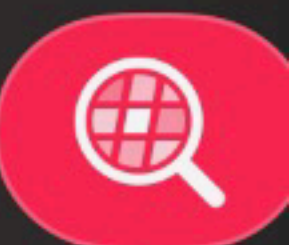
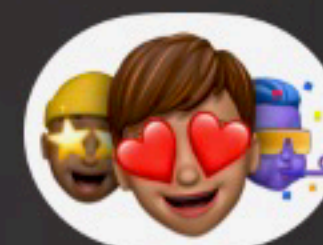
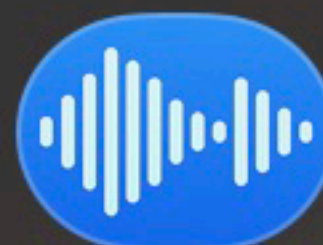
Jan 25, 2022 at 12:40 PM

[vm.tiktok.com](https://vm.tiktok.com)

Don't forget to check on your lightskinned friends



iMessage

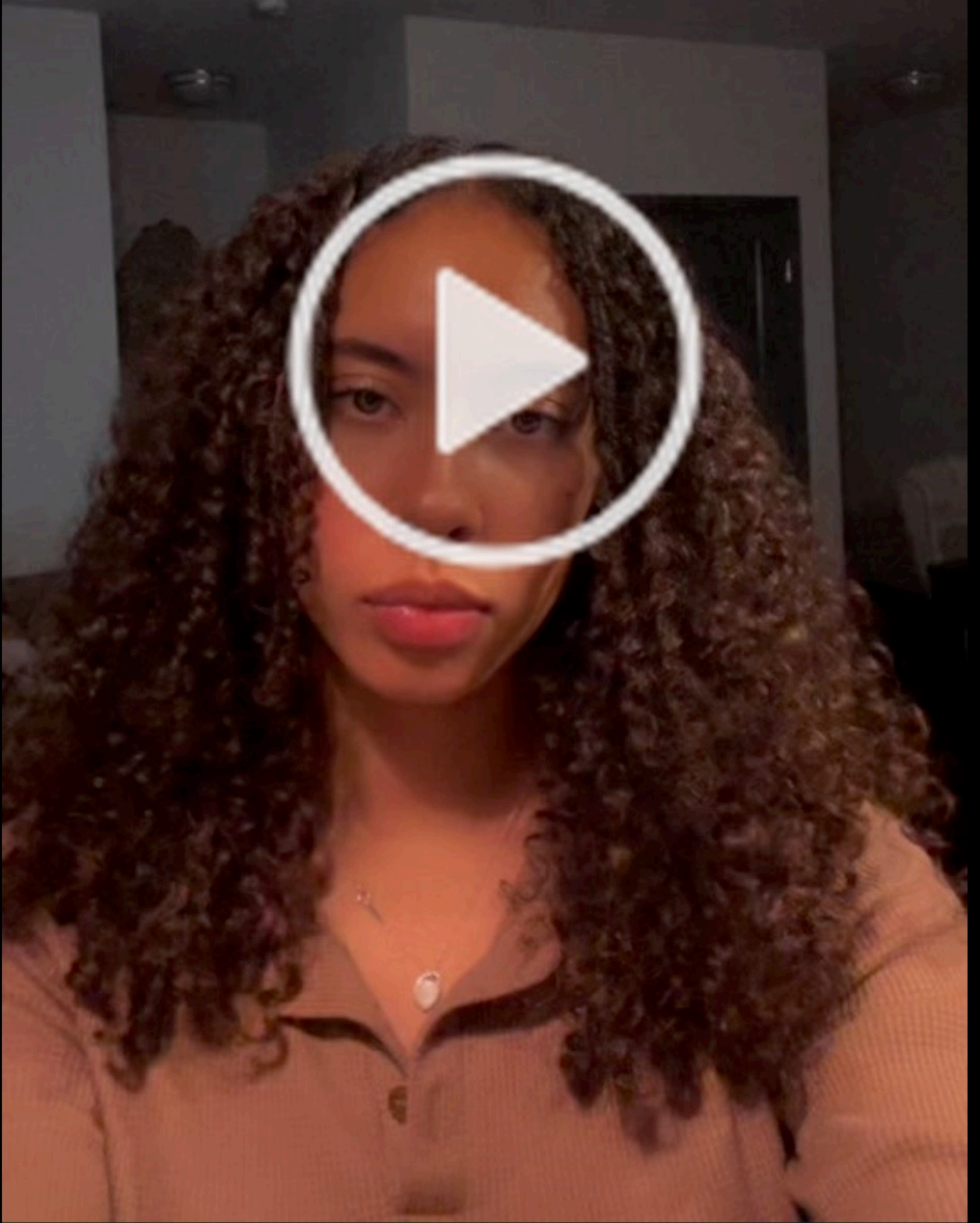






vm.tiktok.com

Don't forget to check on  
your lightskinned friends  
this winter



laina♡ on TikTok  
It starts on TikTok

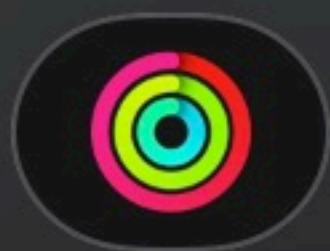
Open



I'm literally white.



iMessage



I'm literally white.

Feb 14, 2022 at 9:41 PM

Bother me tmrw bc im eating dinner then [redacted] coming



Can I eat dinner with you then leave when [redacted] comes?

Honestly I just don't want to speak to humans rn kinda tired and cranky

sorry

but literally grab me tmrw and we can catch up

Just not rn

Fair

Mar 14, 2022 at 1:08 AM

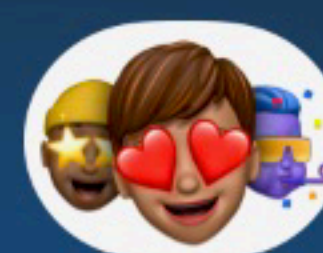
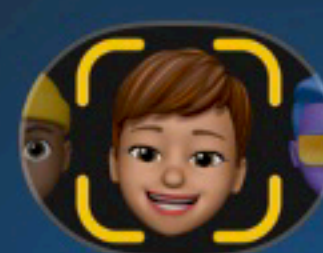
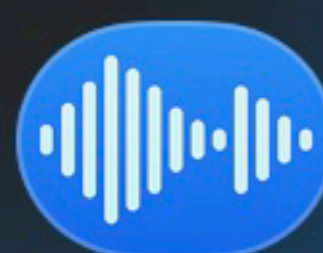
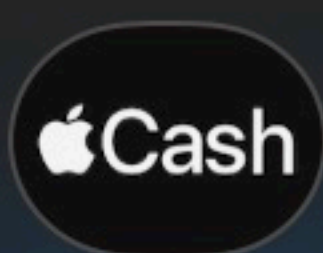
can i ask u sm and u answer honestly?

if ur up

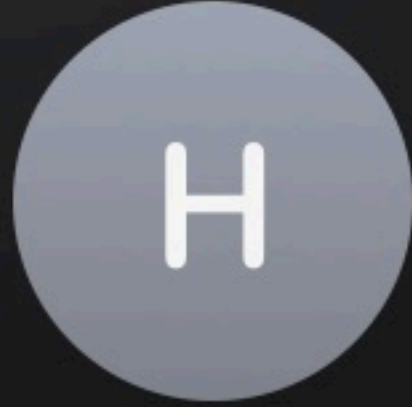
Apr 20, 2022 at 11:24 PM



iMessage



< 613



Helaina >

Apr 20, 2022 at 11:24 PM

Do u have an extra covid test

Literally no clue

I know [redacted] is in there if u wanna knock and check

too lazy

dw

Jul 6, 2022 at 4:44 PM

hey bud how's ur summer

Very meh

You been in Miami all summer?

porque meh

nah

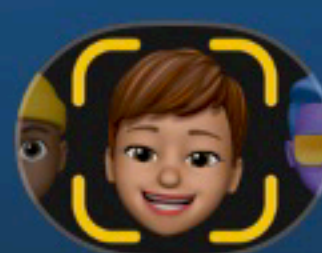
went to Boston for a bit and I'm in Seattle now and going to NU in a week for a camp

then I get to be home all summer :/

Yeah Sis told me she'd be at the camp but I wasn't sure if everyone would be there



iMessage





Yeah Sis told me she'd be at the camp but I wasn't sure if everyone would be there



I've been in Evanston all summer and literally no one's here

2 Replies

What's in Seattle?

1 Reply

I've been in Evanston all summer and literally no one's here

2 Replies

will i get to see u then for camp?

sounds icky

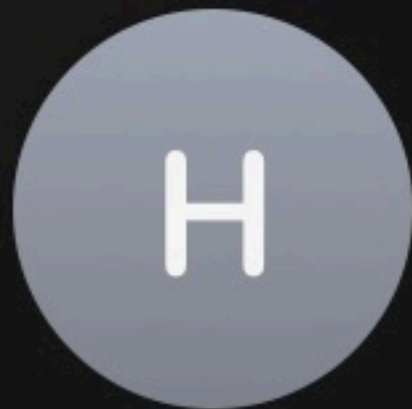
did [redacted] not visit?

1 Reply

What's in Seattle?

1 Reply

family



family

I've been in Evanston all summer and literally no one's here

2 Replies

Yeah I'm not leaving till August at the earliest

did not visit?

1 Reply

She stayed an extra week after school and I saw her last weekend but the in between has been very droll

oh yea same w me and [redacted]

it sucks sm and is frustrating and boring sometimes but eh

worth it?

ok then I'll see u :) 

Definitely worth it and I had to get surgery anyways so no way around it

for what??

for what??

My nerve was in the wrong place

oh shit stressful sorry

It honestly hasn't been that bad

Like I can move it normally already

ok good that's perfect

you should go out with us during camp

apparently we're going out every night

no promises tho

I expected to tbh

At the very least I know I'll see y'all

ok good bc I need someone tolerable there at least 🙄

HA HA

Idk I might just spend my whole night with [REDACTED]

that's a very very very evil joke



iMessage



that's a very very very evil joke

i would actually cry

Don't worry I've reached the point where I can't be around her for more than about 3 minutes 😂

um like most people

wait where are u living in Evanston

In the seniors house on foster

oh ok

deadass have no plan in terms of living for 4 days but I think one of the houses?

I know that [redacted] is currently at Hamlin and I think she's the only one there

I think zoo is empty rn

I know idk if she's staying tho for camp

whatever I'll figure it out

I'm sure that y'all will at least have access to one of the houses



I'm sure that y'all will at least have access to one of the houses

hopefully

There are like 2 random people staying with me it's not even the baseball house anymore really

Is that weird for u? Or normal

like random adults or athletes

Like college kids renting for summer

It's weird but I also haven't seen them

Like yesterday one came and introduced himself but that's really been it

mm ok so not bad

Yeah I'm not in the house much anyways

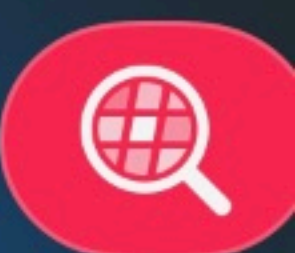
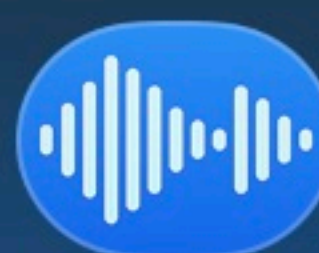
do u have a car w u 🤨

sorry I'm literally badgering u w questions im just bored and miss friends

and also I might need a ride



iMessage





< 613



Helaina >



and also I might need a ride somewhere when I'm there



I don't have a car I've been walking literally so much

And I promise I wasn't doing anything before you texted me 😭

ok fine, mid response

Mid response?

THANKS FOR TEXTING ME HELAINA, I know u don't text anyone so I'm so glad ur talking to me

^preferred response



YOU'RE AN ABSOLUTE ANGEL HELAINA IVE BEEN SUFFERING HERE

That suffice?

And no need to call me out on not texting people 🦴

honestly better than expected

sorry, couldn't help it 😬

sorry, couldn't help it 🙄

I figured I might as well go above and beyond

ur always the best!!

Jul 7, 2022 at 4:30 PM

wait

are u gonna transfer.

why tf is everyone transferring

We got a new coach

But I'm not transferring cuz I didn't play at all

crazy

Jul 18, 2022 at 9:35 PM

Wyd tonight

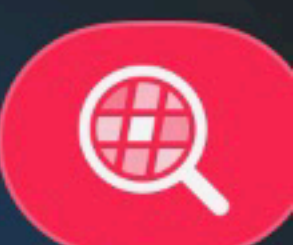
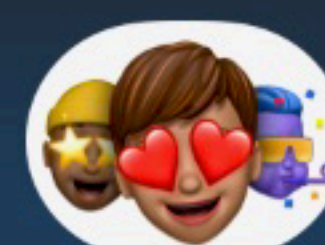
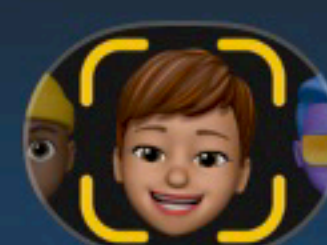
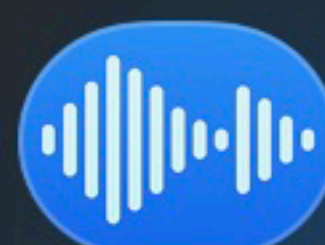
are u at [redacted]

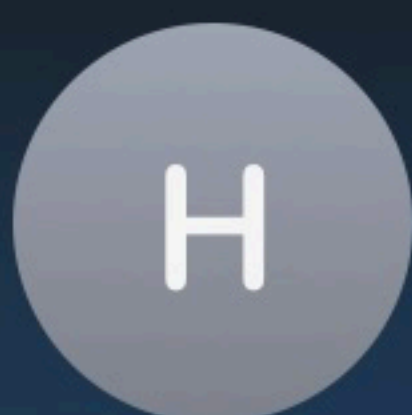
Me [redacted] and [redacted] are about to head over there

Oh ok



iMessage





Oh ok

I'm not going

j checking if u were busy

Why you not going?

I got high and now in a chill cozy binge watching mood instead

You have more?

Imao

[redacted] does

Where's [redacted]

but come if u get bored of [redacted]

I definitely will

May not b going to [redacted] idk

Where you staying

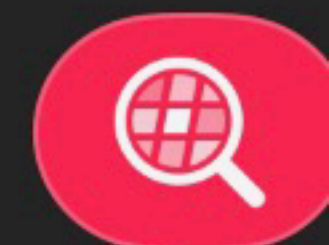
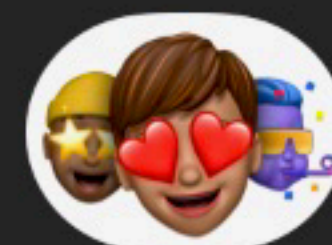
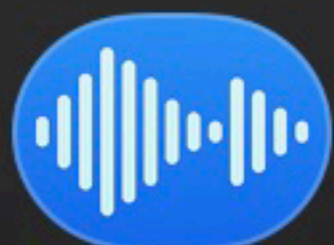
she didn't say

I'm in the zoo rn in [redacted] room

Aight bet



iMessage



< 613



Helaina >



Aight bet

like pls do bc I'm bored and want movie companion

Butvyerd

Bruh hh

It's fun

All athletes

eh

well I'm having the time of my life so

booo u

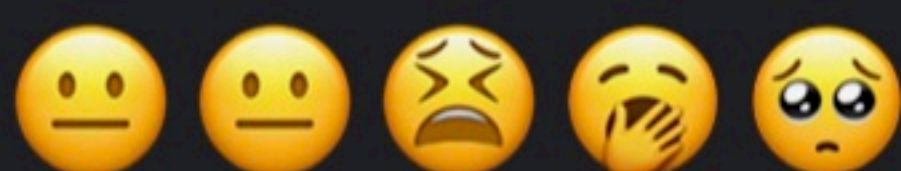
You need to come

no literally come here

for 5 min

please :/

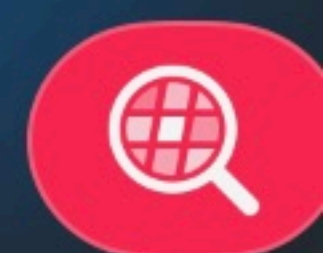
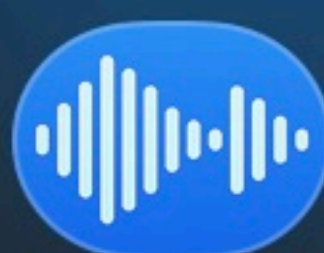
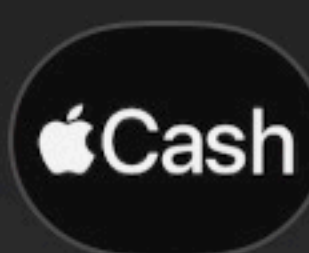
I'm in such a social mood but don't want to leave the house

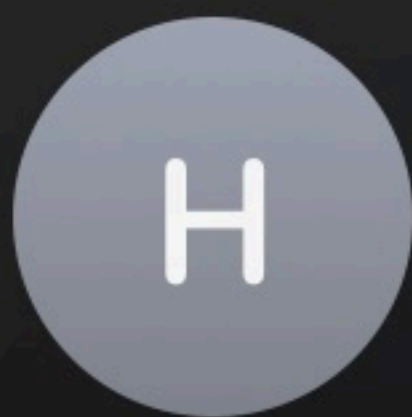


Leave the house



iMessage





Helaina >



Leave the house

Cannot stress this enough

I'll come back with you

no just come now :(

I wanna be chill I don't want to be around many ppl

Just come later for 10 min

I'll come later fs

But it's worth coming

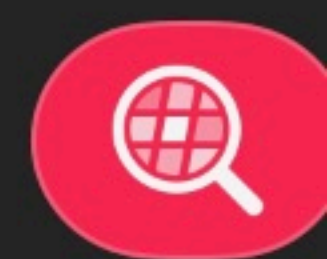
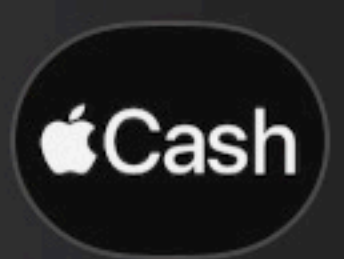
Very chill but it's great

eh im in a very good mood rn here

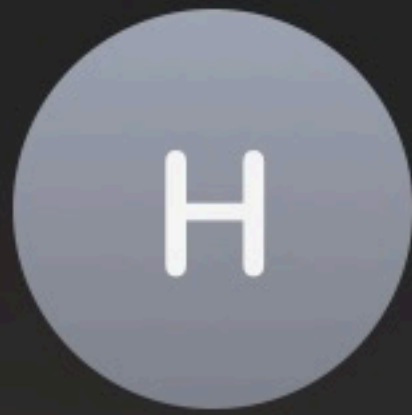
just come within the next 40 min at least 😐



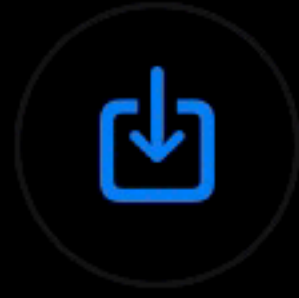
iMessage



< 613



Helaina >



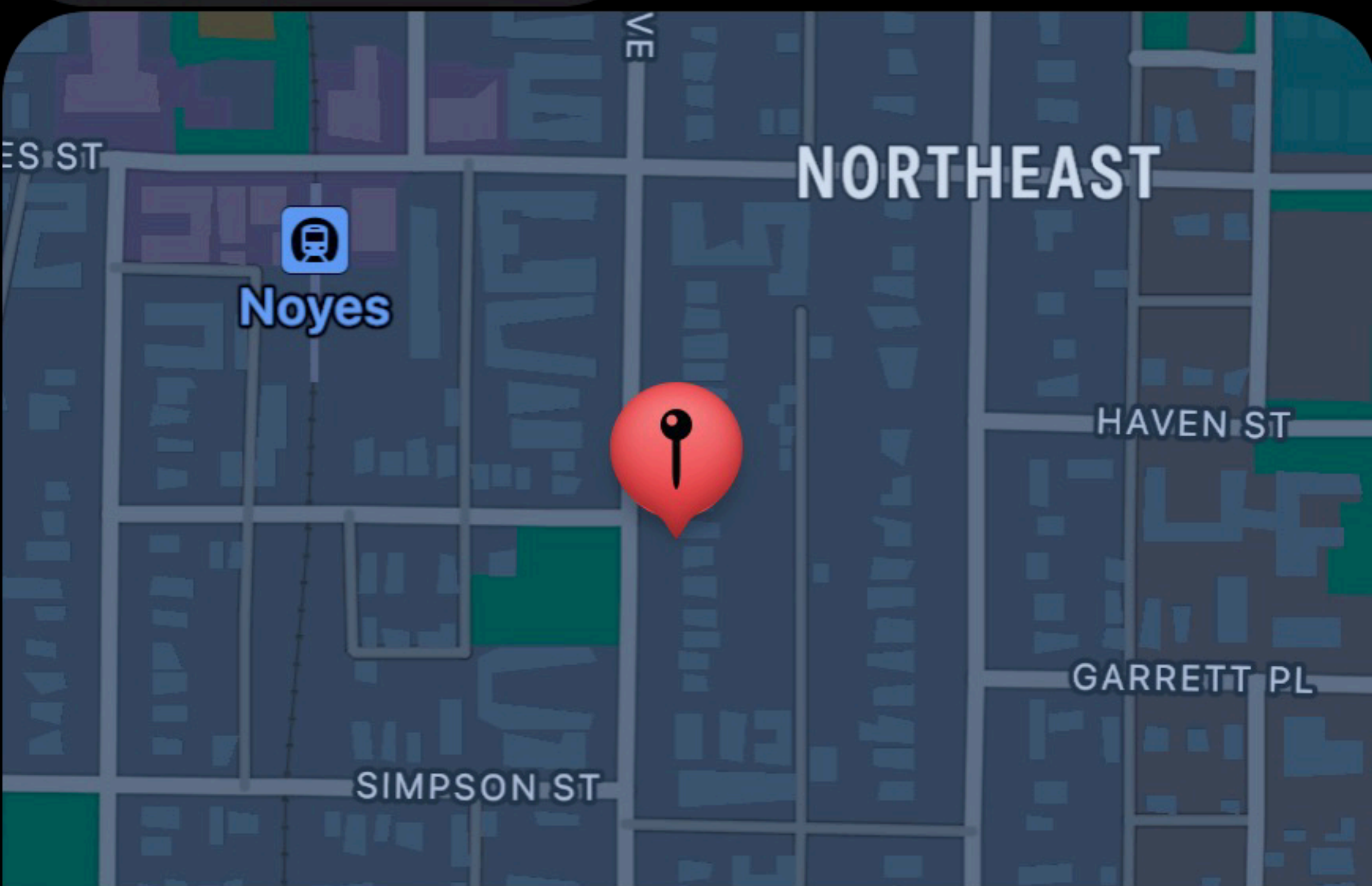
bruhbbhdhs

😐 fuck

Send location

I always forget where zoo is

2131 Sherman



Location from 7/18/22

We're at swamp now

< 613



Helaina >



We're at swamp now

ok ??

are u coming or no

Lmao

Yes I am

co fused

I am for sure coming

oh ok

I'm literally just chilling watching tv on third floor not the living area

Jul 19, 2022 at 4:47 AM

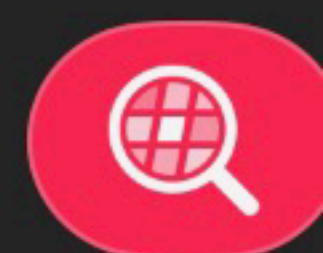
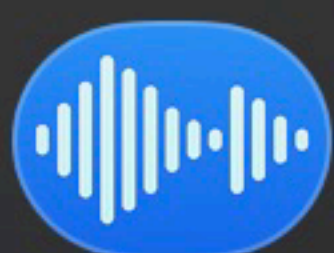
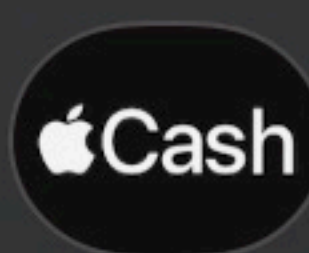
That was a fucked up mistake and I told [redacted], just giving u a heads up. I should've never given you the idea that that was ok I genuinely have never regretted anything more in my life. You don't have to tell [redacted] but just letting u know I told my girlfriend.

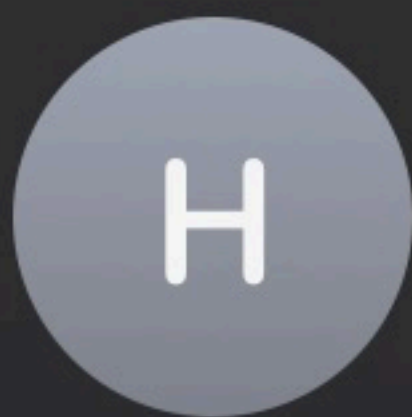
Jul 19, 2022 at 9:53 AM

I talked to [redacted]



iMessage





Jul 19, 2022 at 9:53 AM

I talked to [redacted]

ok well it's fucked and tell [redacted] I'm so sorry and I don't know whether it's bc I was a weird high or just super anxious but I'm so fucking sorry

like what the fuck.

Jul 20, 2022 at 8:04 PM

we are having a thing at the zoo tonight, pretty sure they invited baseball...regardless, I'm asking you not to come

That's unfair, these are my friends as much as they're yours and this is the last time I'm going to see some of my teammates for a long while

ok bruh the come don't speak to me or be around me that's all I'm asking

Sounds like a plan

Jul 20, 2022 at 9:52 PM

I can't even go to a party with my own friends in my own house because you're a selfish disgusting



I can't even go to a party with my own friends in my own house because you're a selfish disgusting person like what. If you're going to do all this and literally fuck up everything and then act like this after the fact

I just really expected respect for me from u given that I genuinely considered you a good friend

This is my last night to see [REDACTED] before he literally transfers schools

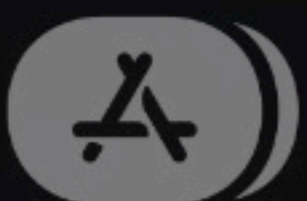
This isn't me acting a way, my close friends are all here

Delivered

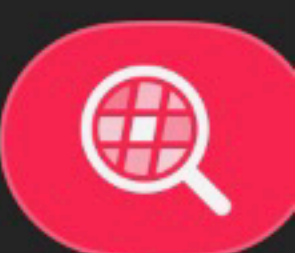
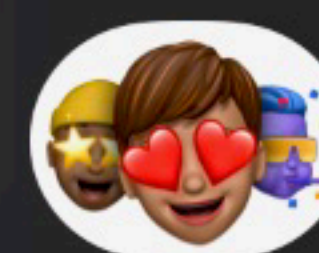
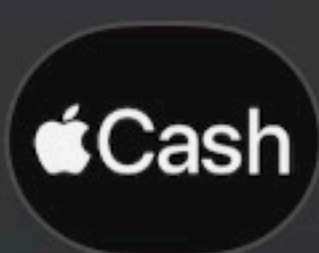
all I'm saying is that this is not the way I treat a "friend" at all especially given everything that just happened.

close friends isn't an excuse you're acting like an asshole and especially after everything that's so absurd for me to see in you

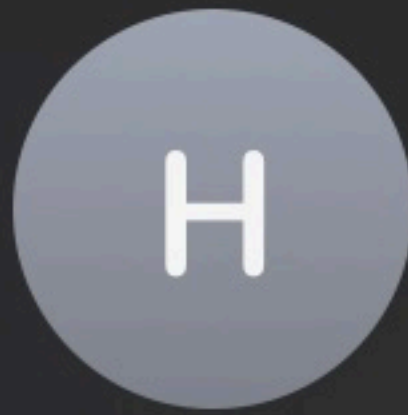
the fact that I'm the one who can't hang out at a party in my OWN house with my OWN friends and how you get to have your happy relationship despite the fact that you fully said and did way more than I did and



iMessage



613



Helaina &gt;



and then act like this after the fact

I just really expected respect for me from u given that I genuinely considered you a good friend

This is my last night to see [REDACTED] before he literally transfers schools

This isn't me acting a way, my close friends are all here

Delivered

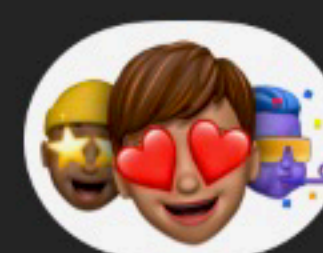
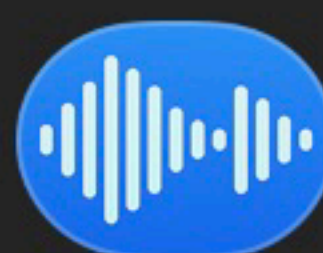
all I'm saying is that this is not the way I treat a "friend" at all especially given everything that just happened.

close friends isn't an excuse you're acting like an asshole and especially after everything that's so absurd for me to see in you

the fact that I'm the one who can't hang out at a party in my OWN house with my OWN friends and how you get to have your happy relationship despite the fact that you fully said and did way more than I did and acted way way worse than I did is so fucked up and you need to know that, I'm just so sad that I actually expect you to act like a friend and respect me at all



iMessage



**EXHIBIT 5**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

## Log Entries

Readey, Chad Malachi McGill 99 25604 Graduated Students Grad: 2021 Discipline Stu #: 18282 State Stu #: 495801132  
Graduated

[Edit Discipline Alert](#)

Date	Description	Demerits
✗ 02/08/2021	Wells, Zachary - <b>3 Absence Notification</b> - T	
✗ 12/11/2020	VanVliet, Danielle - - meeting at parent request	
✗ 09/30/2020	Maul, Lorrie - <b>Documentation</b> - Google meeting regarding National Merit application.	
✗ 09/01/2020	Wells, Zachary - <b>Attendance Consideration</b> - The combination of some challenges that Chad and the family are going through outside of school and the intense coursework that his schedule requires has made it challenging for Chad to stay current with his classwork. A call was made to inform the parents of Chad's attendance in his Calculus class as it is at 6 absences. This was an informative call as he does have more absences in that class than his others. Mr. Readey is aware and they intend to work with the teacher and administration to get back on track. Considering the extenuating circumstances, great consideration will be made regarding his attendance.	
✗ 08/18/2020	VanVliet, Danielle - - Contact parents at Schools request, provided resource list for mental health needs, meeting in person later today	
✗ 02/19/2020	Wells, Zachary - <b>Attendance Contract</b> - Chad has been absent 5 times to 1st period this semester and as a result has been placed on an Attendance Contract for the remainder of the semester. Students are allowed only 8 absences for the semester. At 9 absences students are placed on Social Probation. This means they may not attend any games, dances, or after school events/activities past 3:15. At 10 absences they are dropped from the class with no credit. If any of these absences are the result of receiving medical attention, then a doctor's note needs to be provided to the school in order to excuse them appropriately.	
✗ 02/12/2020	Alexander, Terrell - <b>3T - 1</b> - Chad was tardy a third time to 1st period on 2/12/20, and has been given a 3 hour Deans' detention to be served by 2/19/20. Failure to serve the Deans' detention may render an ISD or drop from the class for the remainder of the semester. Per Homewood-Flossmoor's Tardy policy (p. 38 in the Parent-Student Handbook) a fourth tardy will result in a 5 hour Saturday detention, and a fifth tardy will result in a drop from the class without any credit awarded for the semester.	
✗ 01/28/2020	Wells, Zachary - <b>No ID - 1st received from the dean's off</b> - Chad received a temporary ID on 1/27/2020 and the account has been charged \$1. If a student receives 3 temporary ID's, they will be required to prove that they have a permanent ID by bringing that ID to the dean by the next day. Failure to bring the permanent ID the next day will result in the student's account being charged \$6 and a new ID and lanyard will be provided. It is the responsibility of the student to show the new ID to the dean the next day. Students that borrow 4 or more temporary ID's will receive punitive consequences that become more severe each time an ID is borrowed.	
01/24/2020	Danielle Lusby - <b>Documentation</b> - Chad was referred to the deans office for documentation. Specifically, he confirmed an allegation regarding inappropriate physical contact between him and a female student during the 2018-19 school year. Per his admission, he touched the student's breast while riding on the shuttle bus. Per administrative review, this incident will be confined within the context of a restorative IB cohort-community address, which took place on 1/24/2020 in the Peace Room with the IB coordinator, a dean, a social worker, an IB teacher, and other students in Chad's IB cohort. His parent (mother) was notified via phone.	
01/24/2020	Danielle Lusby - <b>Restorative Conversation</b> - Chad was referred to the deans' office for documentation. Specifically, the student participated in a restorative conference per the request of the IB Coordinator and administration regarding tension that exists within the IB cohort. The conference concluded to the satisfaction of all involved. A mediation agreement was signed in an effort to confirm the action plan to resolve students' concerns and reestablish the cohort community going forward. The student has been encouraged to escalate further concerns to teachers or deans' staff.	
✗ 01/17/2020	Wells, Zachary - <b>2T-1</b> - Chad was tardy a second time to period 1 on 1/16/2020. Per Homewood-Flossmoor's Tardy policy (p. 40 in the Parent-Student Handbook) a third tardy will result in a 3 hour	

**EXHIBIT 6**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

FILED DATE: 8/28/2023 3:51 PM 2023L008661



Pinned



**Chad Readey** @ChadReadey · Aug 15, 2020



Blessed to say I'm committing to Northwestern University's Baseball program to further my academic and athletic career! [#Committed](#)  
[#Wildcats](#)



send a thank you to IMR Athletics and All Aspects. My parents have been essential in guiding me in this journey as well. I am happy to say I'll be joining the Northwestern family!  
[#Committed](#)

D1 Commits and 2 others

12

69

304



**EXHIBIT 7**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

From: AV [REDACTED]

Sent: Monday, August 17, 2020 12:40:35 AM

To: Undergraduate Admission <[ug-admissions@northwestern.edu](mailto:ug-admissions@northwestern.edu)>

Hi! You recently admitted Chad Readey, a student from Homewood Flossmoor to pursue his academic college career at Northwestern. I would like to bring it to your attention that this student has sexually assaulted multiple women during his middle school and high school career. I experienced this firsthand when I was 12 years old but never reported it because I was unaware of what sexual assault even was at the time. Last school year, over 6 girls went to the school administration SEPERATELY, to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions for his repeated sexual assaults against several girls. While 6 girls were vocal and reported, there are many more that chose to stay silent out of fear. I just wanted to inform you of these incidents, and help you become aware of the type of student athlete that you are admitting into your school. Thank you for your time.





AV

Assign Conversation ▼

August 16, 2020 at 11:18 PM

Hi! You recently admitted Chad Readey, a student from Homewood Flossmoor to pursue his academic college at Northwestern. I would like to bring it to your attention that this student has sexually assaulted multiple women during his middle school and high school career. I experienced this firsthand when I was 12 years old but never reported it because I was unaware of what sexual assault even was at the time. Last school year, over 6 girls went to the school administration SEPERATELY, to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions for his repeated sexual assaults against several girls. I just wanted to inform you of these incidents, and help you become aware of the type of student athlete that you are admitting into your school. Thank you for your time.



NU0032

FILED DATE: 8/28/2023 5:36 PM 2023L006664

From: Victoria Olsleye <[vickvolsleye@icloud.com](mailto:vickvolsleye@icloud.com)>  
Date: August 17, 2020 at 10:53:59 PM CDT  
To: "Morton O. Schapiro" <[mo-president@northwestern.edu](mailto:mo-president@northwestern.edu)>, Spencer Allen <[spencer.allen@northwestern.edu](mailto:spencer.allen@northwestern.edu)>  
Subject: Chad Readey

Hello,

I hope this email is reaching you both in good health. I will get straight to the point because I realize that you both are very busy people. It's come to my attention and many of my peer's attention that Chad Readey will be playing baseball for your school after he graduates. As someone who has gone to school with him for 7 years now, I don't think that this is the smartest nor safest decision you all can make. Chad Readey has a horrible and long record of sexually harassing and sexually abusing girls. The list of names unfortunately is very long. And this has happened since we were younger. He has never been penalized for it even though it has been brought to Homewood-Flossmoor High School's attention (you can ask the school for more information). As a result, many girls at our school, girls that I am friends with or have spoken to have been let down and walk around in antagonizing fear. I know that your school prides yourself on its student life and the safety of your students. I'm sorry to say that if you let him onto campus or the field, many more lives can be fatally affected. Chad has never received more than a slap on the wrist which is why he has yet to learn his lesson. I am really hoping that you do not contribute to giving him just a slap on the wrist. Especially because many of the girls who have been abused by him initially planned on applying and hopefully attending your wonderful school. Please put this to an end. Not to take away from his opportunity, but to hopefully help him learn his lesson because in a lot of cases it takes something being taken away from you for you to reassess. Thank you for your time.

DATE: 8/28/2023 3:51 PM 2023L008661

From: keeley staniel <[keeleynstaniel@gmail.com](mailto:keeleynstaniel@gmail.com)>  
Sent: Monday, August 17, 2020 2:55:52 PM  
To: Undergraduate Admission <[ug-admissions@northwestern.edu](mailto:ug-admissions@northwestern.edu)>

Hello! My name is Keeley Staniel and it has recently been brought to my attention that Chad Readey, a senior at Homewood Flossmoor high school has been admitted to further pursue his athletic and academic career. I feel as if I should bring it to your attention that this student has had multiple sexual assault allegations against him. Close friends of mine have reported abuse from dating back to junior high. This went unreported because they did not understand the severity of his actions at the time. Since then six more girls have separately come forward to Homewood Flossmoor's administration about Chad sexually assaulting them. There are countless others who were too afraid to come forward or felt that it was pointless seeing that he received no repercussions for his actions. The administration brushed each of these allegations under the rug despite Chad admitting to his actions. I am certain that this is not the kind of student or athlete you want representing your school.

NU0015

FILED DATE 8/23/20 3:51 PM 2023L008661

**From:** McGary, Kaitie <[k.mcgary@wustl.edu](mailto:k.mcgary@wustl.edu)>  
**Sent:** Tuesday, August 18, 2020 12:00:56 AM  
**To:** Neftaly Lara <[neftaly.lara@northwestern.edu](mailto:neftaly.lara@northwestern.edu)>  
**Subject:** Concern of Incoming Student

Dear Ms. Lara Neftaly,

I was reaching out with a concern regarding a newly accepted student within your university. As the Chicago south suburbs admissions representative, I thought you would be the best person to reach out to. My name is Kaitlyn McGary, a first year at Washington University in St. Louis. I actually was interested in Northwestern at one point in my academic journey, and I appreciated the ideals and rich history of the institution.

My concern is centered about a student named Chad Readey, who attends Homewood-Flosmoor High School—located in Flosmoor, Illinois. He was recently accepted and committed to the university's baseball program, but I believe his current status as a student should be reconsidered because of his past actions.

According to his own admittance several months prior, Readey sexually assaulted a peer within his community. Knowing Northwestern's values and commitment to academia and scholarship, I beg that an investigation is launched into his actions, the accusations bade against him, and his personal admittance of fault. As a student myself, I recognize some of the pressures of schools filtering through students and making decisions about their admittance, especially when in relationship with other departments within the university, but in order to maintain your own integrity as an institution, I request you consider what type of students represent you.

Thank you in advance for caring for the well-being of other students and being dutiful in your work as a representative of the university.

NU0017

DATE: 8/28/2023 3:51 PM 2023L008661

**From:** Coon Squad <[justin8hommer23@gmail.com](mailto:justin8hommer23@gmail.com)>  
**Sent:** Monday, August 17, 2020 2:45:43 PM  
**To:** Undergraduate Admission <[ug-admissions@northwestern.edu](mailto:ug-admissions@northwestern.edu)>

Hello! My name is Matthew Hommer and it has recently been brought to my attention that Chad Readey, a senior at Homewood Flossmoor high school has been admitted to further pursue his athletic and academic career. I feel as if I should bring it to your attention that this student has had multiple sexual assault allegations against him. Close friends of mine have reported abuse from dating back to junior high. This went unreported because they did not understand the severity of his actions at the time. Since then six more girls have separately come forward to Homewood Flossmoor's administration about Chad sexually assaulting them. There are countless others who were too afraid to come forward or felt that it was pointless seeing that he received no repercussions for his actions. The administration brushed each of these allegations under the rug despite Chad admitting to his actions. I am certain that this is not the kind of student or athlete you want representing your school.

NU0018

FILED DATE 09/28/23 3:51 PM 2023L008661

meetings,

My name is Kai Offett and I am a freshman at Loyola University Chicago, as well as a former student of Homewood Flossmoor Community High School. I was recently made aware of a new student/baseball recruit for Northwestern University named Chad Readey that currently is a senior at Homewood Flossmoor High School. I was immediately alarmed at this announcement, as this student has multiple alarming sexual assault allegations. Northwestern University is an extremely prestigious institution, and I'm sure that such you would not want an incoming student with such allegations, nevertheless those allegations being confirmed on multiple occasions.

I personally know multiple girls who have been sexually assaulted by Chad Readey including Ava Jones, a fellow alumni of Homewood Flossmoor, Aria Sline a student who is in the same graduating class as Chad, and Katie Knottke who is also in the same graduating class of 2021. He has multiple allegations of sexual assault from middle school throughout his high school career. These are only a few of the girls know who consent to being named. There have been 7 more who have reported their instances of being assaulted to Homewood Flossmoor Administration, in each of which no action has been taken on behalf of Homewood Flossmoor's baseball team or the institution itself. Aria Sline is one of the many girls who has reported their assault to the administration in great detail. Chad Readey has even admitted to some of these allegations and still he has faced no repercussions.

I am emailing to ask that you seriously reconsider and immediately rescind your offer to Chad Readey as a baseball commit and as a student. Sexual Assault victims deserve to be believed and I genuinely believe that this student is a threat to other incoming students at your university. Please feel free to reach out to this email for any more information or inquiries.

NU0021

**camille.willis**  
Assign Conversation

D1 Commits and 2 others

imready Happy to say I'm #committed to Northwestern University to play Baseball 🎮👏

Hi! I'm Camille and I go to school and have gone to school with Chad since seventh grade. In the time I've known him I've talked with many girls who tell similar stories of being sexually assaulted by him. We've gone to our school administrators but he's never gotten more than a slap on the wrist. I just wanted to make sure you all were aware of the type of person you're admitting.

NU0022

**EXHIBIT 8**

FILED DATE: 8/28/2023 3:51 PM 2023L008661



FILED

DATE: 8/28/2023 3:51 PM 2023L008661

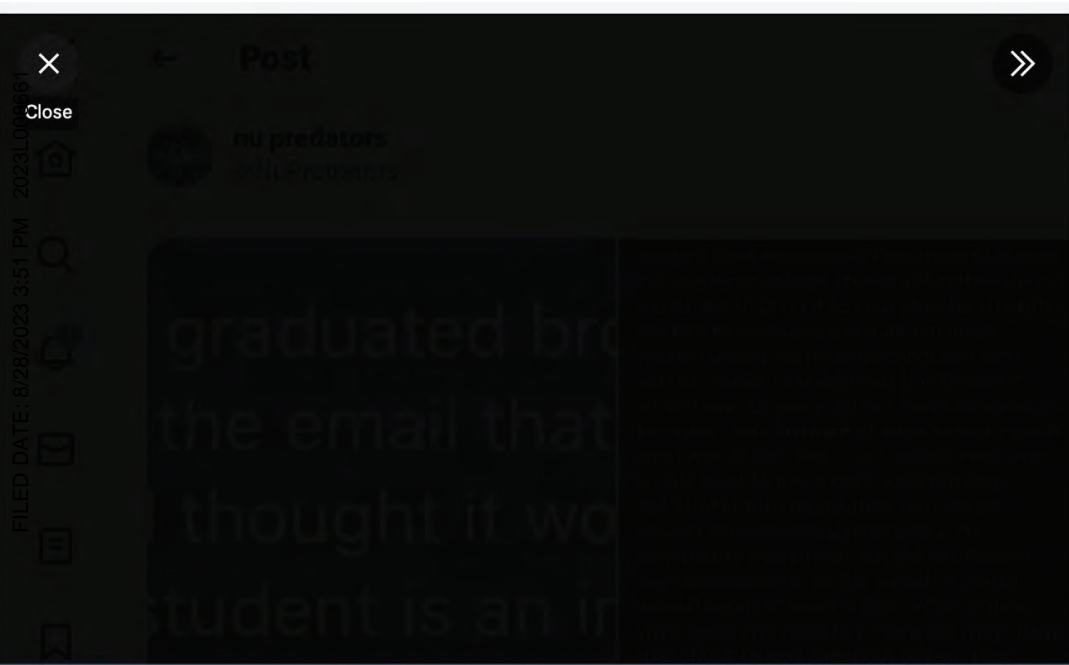
**From:** Liz Carrick [<mailto:jonestori784@icloud.com>]  
**Sent:** Monday, August 17, 2020 12:51 PM  
**To:** Spencer Allen <[spencer.allen@northwestern.edu](mailto:spencer.allen@northwestern.edu)>  
**Subject:**

Hi! You recently admitted Chad Readey, a student from Homewood Flossmoor to pursue his academic college career at Northwestern. I would like to bring it to your attention that this student has sexually assaulted multiple women during his middle school and high school career. I experienced this firsthand when I was 12 years old but never reported it because I was unaware of what sexual assault even was at the time. Last school year, over 6 girls went to the school administration SEPERATELY, to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions for his repeated sexual assaults against several girls. While 6 girls were vocal and reported, there are many more that chose to stay silent out of fear. I just wanted to inform you of these incidents, and help you become aware of the type of student athlete that you are admitting into your school. Thank you for your time.

NU0020

**EXHIBIT 9**

FILED DATE: 8/28/2023 3:51 PM 2023L008661



FILED DATE: 8/28/2023 3:51 PM 20230828161

A friend who just graduated brought this to my attention. This is the email that was sent to admissions, and I thought it would be good to share here. The student is an incoming baseball player. →

 **nu predators**  
@NuPredators

1:26 PM · Aug 19, 2020

10 Reposts 1 Quote 74 Likes

1 Bookmark

 Post your reply! [Reply](#)

FILED DATE: 8/28/2023 3:51 PM 2023L0006

Close

Post

nu predators

Hi! You recently admitted Chad Readey, a student from Homewood Flossmoor to pursue his academic college career at Northwestern. I would like to bring it to your attention that this student has sexually assaulted multiple women during his middle school and high school career. I experienced this firsthand when I was 12 years old but never reported it because I was unaware of what sexual assault even was at the time. Last school year, over 6 girls went to the school administration ← OPERATELY, to report their own sexual assault experiences against Chad. He admitted to everything, but did not receive any repercussions for his repeated sexual assaults against several girls. While 6 girls were vocal and reported, there are many more that chose to stay silent out of fear. I just wanted to inform you of these incidents, and help you become aware of the type of student athlete that you are admitting into your school. Thank you for your time.

11

74

 **nu predators**  
@NuPredators

1:26 PM · Aug 19, 2020

10 Reposts 1 Quote 74 Likes

1 Bookmark

 Post your reply! [Reply](#)

**EXHIBIT 10**

FILED DATE: 8/28/2023 3:51 PM 2023L008661



September 18, 2020

Mr. Jay Readey and Dr. Lisa McGill  
710 Argyle Avenue  
Flossmoor, IL 60422

Dear Mr. Readey and Dr. McGill:

As you are aware, eight current and former students sent emails and made social media posts directed at Northwestern alleging your son, Chad Readey, has a history of sexual assault and sexual harassment that has been reported to Homewood-Flossmoor Community High School District No. 233, but has not been addressed. As a result of these reports, we investigated these claims. Our investigation included an extensive review of records including: the student records of the women who contacted Northwestern; the student records of the girls named by the women who contacted Northwestern; the student records of the students in the H-F International Baccalaureate (IB) Program (a small, honors program in which Chad participates); Chad's student records; and the District's email server. As part of the investigation, we reviewed hundreds of emails that mentioned Chad or the other students to determine if there were any emails that substantiated the claims sent to Northwestern. Additionally, we interviewed several current and former staff members. After concluding our exhaustive search, the District has no record that substantiates the claims made by the women who contacted Northwestern.

The women who reported claims of sexual harassment to Northwestern may be aware of two incidents that involved Chad, but the District did investigate these incidents and determined neither incident constituted sexual harassment or sexual assault. Chad was not disciplined for either incident.

During the 2019-2020 school year, some of the women in the IB program with Chad complained about a group of men in the program that were inappropriate. The women claimed that the men made inappropriate statements about women's bodies, made comments that were misogynistic and degrading, and generally bullied the girls based on their gender. The incident was investigated by the District, and several statements were taken from both the men and the women involved. The District determined that the behavior of the men was inappropriate, but did not find the behavior to be sexual harassment. Both the men and women were referred through the District's restorative justice model to resolve the incident and no further complaints were filed. In reviewing the documents of this investigation, it is important to note that Chad is included within the group of men in question, but none of the specific allegations of harassment in the IB program were against Chad. The women did raise more specific allegations against two other male students in the group.

Second, two years prior, during Chad's sophomore year, Chad allegedly touched a female student's breast over her clothing on a school bus. The student did not report the incident when it happened, but did report the incident nearly a year later to a teacher who then met with the student and her school counselor. At the time, the student told the teacher and counselor that the issue had been resolved a year ago and that she did not want further investigation into the matter as there had been no further incidents or concerns related to this student. During the IB investigation in 2019-2020, the allegation of Chad touching a woman's breast

FILED DATE: 8/28/2023 3:51 PM 2023L008661

over her clothing during his sophomore year was raised by one of the IB women who was a friend of the woman involved. The woman involved was not an IB student and was not automatically part of that investigation, but was called in to make a statement about the bus incident and Chad was given the opportunity to respond. Chad admitted to touching the student's breast over her clothing during a lapse of judgement while they were riding a shuttle bus together, and when she objected to him touching her, he stopped and there have been no further incidents over the past two years.

As explained above, after a thorough and exhaustive investigation, we have no evidence that supports the allegations made by current and former students to Northwestern regarding Chad. None of the incidents that were reported were considered sexual harassment or sexual assault by the administrators investigating. Accordingly, we consider this matter closed.

Sincerely,

  
Jodi Bryant  
Director of Human Resources & Public Relations

  
Craig Fantin  
Associate Principal

# EXHIBIT 11

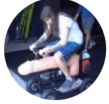


2:01

5G



Tweet



ur mom

@urmom20034749



I heard chad not only a rapist but dl as fuck 🤢🏳️‍🌈 #lastnightasaviking

11:10 PM · 5/18/21 · Twitter for iPhone

1 Like



Tweet your reply



FILED DATE: 8/28/2023 3:51 PM 2023L008661



Tweet



**big head**  
@bighead59417981



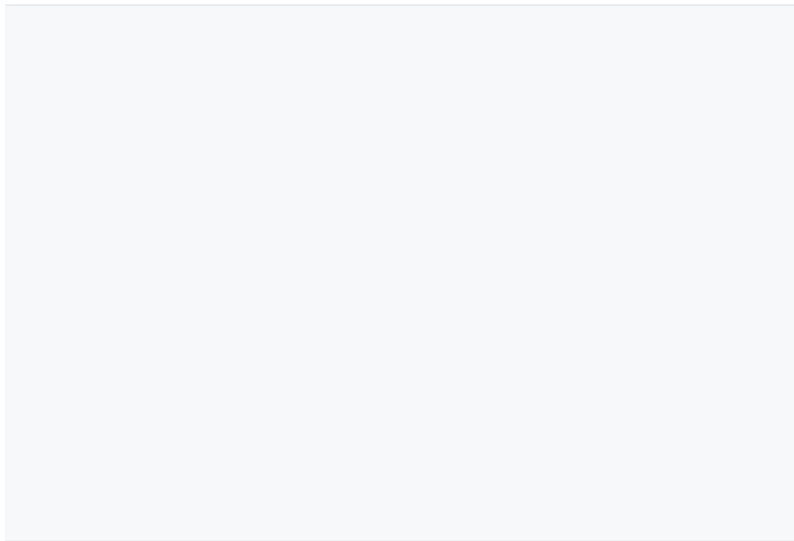
This mf also ain't ever get no typa punishment ole piece of shit ass dude  
[#lastnightsaviking](#)



**john doe** @johndoe4\_ · 3h

Chad Readey got double digit sexual assault accusations and niggas still defend this nigga  
[#lastnightsaviking](#)

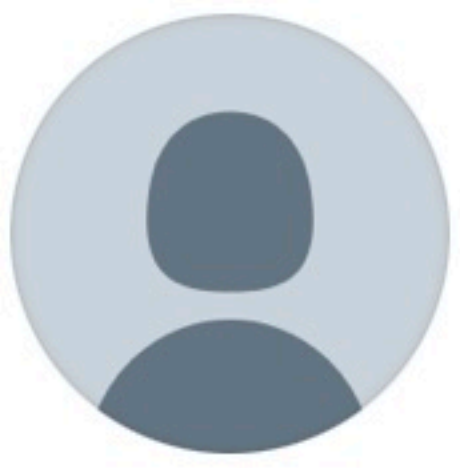
10:46 PM · 5/18/21 · [Twitter for iPhone](#)



Tweet your reply



# Tweet



**john doe**  
@johndoe4\_



Chad Readey got double digit sexual assault accusations and niggas still defend this nigga  
[#lastnightasaviking](#)

10:43 PM · 5/18/21 · [Twitter for iPhone](#)

1 Quote Tweet 15 Likes

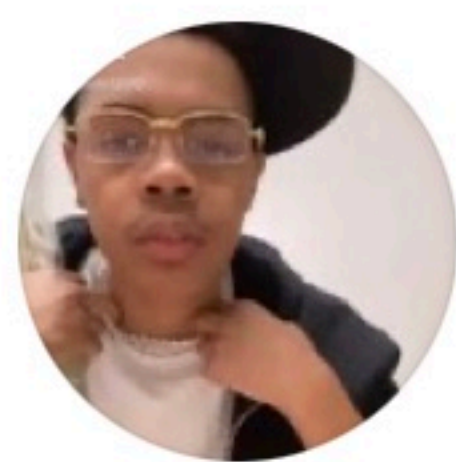


Tweet your reply





# Tweet



**tyfromchi burner**  
@iminscrewgang



Chad put up Wilt numbers on and off the court 🚦 🚦 [#lastnightasaviking](#)

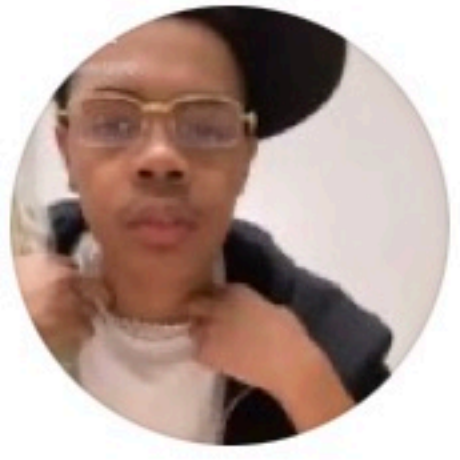
11:00 PM · 5/18/21 · [Twitter for iPhone](#)



Tweet your reply



# Tweet



**tyfromchi burner**  
@iminscrewgang



Chad fucked Natalie and her whole group 🚦 Curtis fucked Symone  
[#lastnightsaviking](#)

11:05 PM · 5/18/21 · [Twitter for iPhone](#)

1 Retweet 1 Like

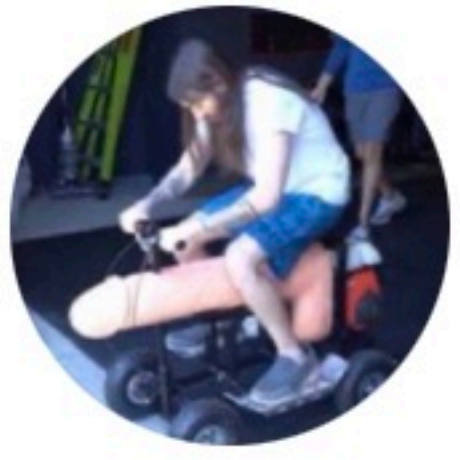


Tweet your reply





# Thread



**ur mom**  
@urmom20034749



Like if chad a bitch 100  
[#lastnightasaviking](#)

12:13 AM · 5/19/21 · [Twitter for iPhone](#)

1 Quote Tweet 55 Likes



You reported this Tweet.

[View](#)

[Show more replies](#)



Tweet your reply





# Tweet



**Mr. Wells**  
@coachZ\_wells



Chad got like 15 cases pending been onna loose since 2016 on some EDP445 shit [#lastnightasaviking](#)

10:29 PM · 5/18/21 · [Twitter for iPhone](#)

5 Likes



Tweet your reply

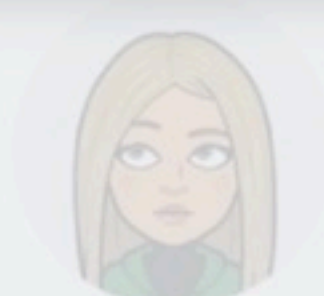


FILED DATE: 8/29/2023 3:51 PM 2023L00861



**ChadReadeyToRape**

Chase sent a chat!



nina\$ki  
nina.ski

+ Add

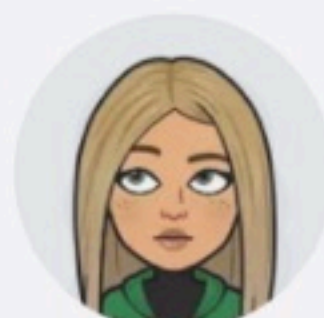


Chase  
**Cami**  
chase5x · 57,081  
cami.dot · 29,969

+ Add



**savannah** 🌊  
savvykitten · 218,602

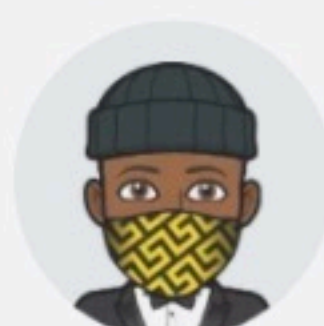


nina\$ki  
nina.ski · 29,969

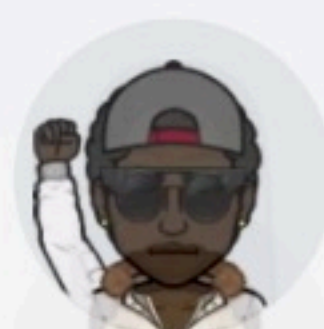
+ Add



Ryan 🦁  
ryansaundersss · 174,943



😂 **Nemo**  
nray06 · 194,664



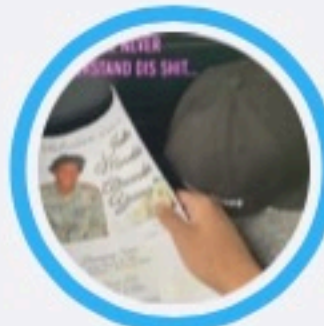
**FRANCHISE** 🤝  
frank\_faneto  
nevin3x · 116,151

+ Add



**Chri\$tian** 🏀 !!  
richgodd\_8

+ Add



Trey 🏹  
v.cooksey3x · 268,969

+ Add



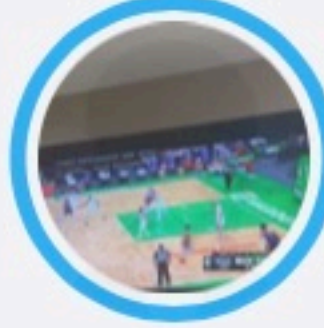
Trey 🍆 🐱 💎 💧  
tj\_savag3 · 156,922

+ Add



Elijah 👉  
ifinessejordan · 156,922

+ Add



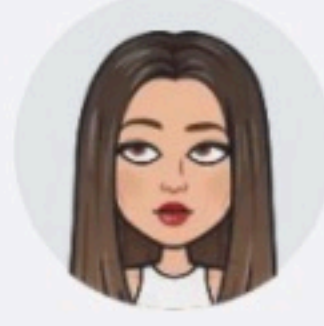
Daniel 🤨  
f1nneserdj · 85,442

+ Add



Zay 🍆  
mrbigboss12 · 136,279

+ Add



Ella 👍  
ella\_gracema

+ Add



Dono 🐱 TM  
donald3x

+ Add



Law Division Motion Section Initial Case Management Dates for CALENDARS (A,B,C,D,E,F,H,R,X,Z) will be heard In Person.  
All other Law Division Initial Case Management Dates will be heard via Zoom  
For more information and Zoom Meeting IDs go to [https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906\\_SelectTab/12](https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906_SelectTab/12)  
Court Date: 11/2/2023 9:00 AM

**EXHIBIT 12**

FILED  
8/28/2023 3:51 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2023L008661  
Calendar, H  
24146890

FILED DATE: 8/28/2023 3:51 PM 2023L008661

**AFFIDAVIT OF ARIA SLINE**

1. My name is Aria Sline. I am nineteen years-old and I have personal knowledge of the matters set forth herein.

2. I am currently a student at Washington University in St. Louis and am studying Philosophy and Neuroscience and Psychology. I am also a cheerleader.

3. I went to middle school and high school with Chad Readey ("Chad") and, for many years, considered Chad to be my friend.

4. During middle school and high school, Chad did many things that made me feel uncomfortable, made me feel violated, and now that I am older consider predatory. Here are some examples:

5. During middle school and high school, on many occasions, Chad asked me to send him nude pictures of myself. He would refer to them as "nudes".

6. Chad and I had driver's education class together when I was approximately 15y ears old. Here are examples of how he behaved towards me during that class:

- (a) Chad asked if he could "finger" me.
- (b) Chad would take my pencil and rub it on his gentiles (outside of his pants) and then try to touch me with the pencil.
- (c) Chad would regularly touch me inappropriately and invade my personal space. For example, he would touch my inner thigh.
- (d) Chad would unzip my clothing (my hoodie) to see if I was wearing anything underneath.
- (e) During class Chad would ask to meet me near the bathroom in a manner that made me believe he wanted to meet to have a sex there.

(f) Chad bragged about having sex with others. For example, Chad told me that when he has sex with girls, he prefers them to be quiet, to take it, and not to moan or make other noise.

7. When Chad would do the things described above, I would tell him to stop or show my disapproval. I felt uncomfortable as I was only 15 years old.

8. Chad's behavior towards me, when I was so young, was scary and confusing because I considered him to be a friend, he was a popular athlete, and his parents were powerful in our community. All of this made me scared to speak up to others.

9. Towards the end of my sophomore year of high school, I began to date another student at my high school. I decided I needed to have a formal conversation with Chad to make his abuse towards me stop once and for all-- instead of just telling him to stop as it was happening.

10. Late in our sophomore year, I asked Chad to have a talk with me. He agreed to do so. I told him that he was not allowed to touch me ever again. Chad said "ok" in response. However, he then he immediately grabbed my breast. I considered this to be a sexual assault.

11. I was ultimately called to the Deans' Office at Homewood Flossmoor high school one day during school. I learned that other girls had complained about Chad's behavior and had given my name as someone else who was mistreated by him.

12. I told Dean Lusby and Dean Wells (the football coach) some of what I had experienced. They told me they would investigate Chad but would not tell me what happened to him.

13. Part of the abuse that occurred to me empowered me to help start a podcast relating to not accepting abuse from men.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this instrument are true and correct. FURTHER AFFIANT SAYETH NOT.

*Aria Sline*, Aria Sline

Dated: September 6, 2022 09/06/2022 14:36 UTC

**EXHIBIT 13**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

# hendersonPARKS

The Marquette Building  
140 South Dearborn Street | Suite 1020 | Chicago, IL 60603  
T 312.262.2900 | F 312.262.2901  
Henderson Parks, LLC | [www.henderson-parks.com](http://www.henderson-parks.com)

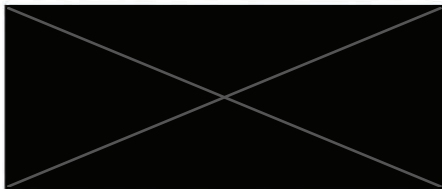
Victor P. Henderson

(312) 262-2900


[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)

December 14, 2022

VIA HAND DELIVERY



*Re: Chad Readey v. Justin Libretti-Rivers, et al.*

Dear Ms. 

Please be advised that this firm represents Chad Readey, who is the Plaintiff in a case pending in the Cook County Circuit Court (No. 2022 L 005944); see enclosed complaint. This purpose of this letter is to make you aware of the intention to also name you as a Defendant in that action on or before December 30, 2022. You are advised to promptly obtain legal counsel.

If you or your legal counsel would like to explore alternatives to naming you in the lawsuit, please contact this office by no later than close of business (5:00pm), on December 21, 2022. If you are unable to obtain legal counsel by December 21st, please call this office to discuss your options. If we do not hear from you or your counsel by that time, we will proceed with filing Mr. Readey's legal claims against you.

We can be contacted at 312-262-2900.

Sincerely,

HENDERSON PARKS, LLC



Victor P. Henderson

VPH/cs

Enclosure

cc: Kimberly N. Tarver, Esq.

**EXHIBIT 14**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

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

JANE DOE,

Plaintiff,

v.

CHAD READEY,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

No.

**JURY TRIAL DEMANDED**

---

**Verified Complaint**

Plaintiff Jane Doe, by and through her attorney, Tamara Holder, states in her Verified Complaint against defendant Chad Readey as follows:



## VENUE AND JURISDICTION

1. Venue is proper in the Circuit Court of Cook County because the events giving rise to the instant claims occurred within Cook County, in the State of Illinois, and the defendant resides in Cook County, Illinois.

2. This case is being filed in the law division because the amount in controversy exceeds \$50,000.

## INTRODUCTION

3. This is a complaint that seeks to end the toxic pattern in America where star student-athletes get to hide behind their elite schools and proud parents as they sexually abuse women, then intimidate and fight them when they speak out.

4. Upon information and belief, on or about the Fall 2019 - Spring 2020 school year, at least six (6) Homewood-Flossmoor High School students reported to the Dean's office that the defendant in this case, classmate Chad Readey, was engaging in sexually abusive conduct towards them. The school opened an "investigation" into their star student-athlete.

5. The plaintiff in this case, Jane Doe, was not one of the students who initially reported Chad Readey, although she had been sexually harassed and sexually assaulted by him for years, beginning when they were both students at Parker Junior High School, beginning on or about Fall 2015 – Spring 2016.

6. A star student in her own right, Ms. Doe chose not to report Chad Readey or seek legal action against her perpetrator.<sup>1</sup> She did, however, tell close friends and family about his unwelcome, hyper-sexualized behavior throughout the years.

---

<sup>1</sup> Ms. Doe's failure to report is not uncommon. In fact, the Illinois General Assembly acknowledges that, "Sexual assault and sexual abuse are personal and violent crimes that disproportionately impact women, children, lesbian, gay, bisexual, and transgender individuals in Illinois, yet only a small percentage of these crimes are reported, less than one in five, and even fewer result in a conviction." See 725 ILCS 203/5.

7. During the “investigation,” the complaining female students told Homewood-Flossmoor officials that Ms. Doe, too, had information about Chad Readey. As a result, Ms. Doe was called into the Dean’s office for questioning.

8. Then just 16-years old, Ms. Doe told officials that Chad Readey habitually sexually harassed her and touched her without her consent over the course of several years. She also provided the school with a detailed a written statement.

9. Among other things, Ms. Doe stated that, during their sophomore year, on or about Fall 2018 – Spring 2019, when she was just 15-years old, she clearly instructed Chad Readey to stop touching her. In response, he grabbed her breast without her consent. Ms. Doe told Homewood-Flossmoor officials that she believed this conduct was sexual assault.

10. Chad Readey admitted to officials that he did, indeed, grab Ms. Doe’s breast, as stated in a letter Homewood-Flossmoor sent to his parents. See Exhibit 1 – Homewood-Flossmoor Letter.

11. After taking her statement, Ms. Doe never heard back from Homewood-Flossmoor officials.

12. Upon information and belief, Homewood-Flossmoor chose not to punish Chad Readey and instead closed their investigation.

13. Then, on August 16, 2020, Chad Readey posted on Twitter that he had committed to Northwestern University, where he would play baseball.

14. In response, numerous classmates – people who personally knew Chad Readey – publicly exposed the allegations that had been levied against him during high school.

15. Ms. Doe was not one of those commenters, instead choosing to focus on her own upcoming admission to college.

16. In response to the comments, Chad Readey - presumably by way of his parents' pocketbook - hired lawyers to send threatening letters to his classmates, demanding retractions drafted by the lawyers.

17. Then, nearly two years later, in July 2022, Chad Readey filed a defamation lawsuit against several classmates, including but not limited to Ms. Doe's then-boyfriend, who commented, "Congrats to someone who's going to Northwestern but doesn't know and hasn't learned what consent is."<sup>2</sup>

18. Despite admitting to sexually assaulting Ms. Doe - both to the school, as well as in his own defamation complaint against others - Chad Readey has now returned, years later, to intimidate Ms. Doe and her parents via his lawyers, with threats to add her as a defendant to his defamation lawsuit.

19. As a result, Chad Readey has left Ms. Doe with no choice but to file this lawsuit, in an attempt to finally seek justice for his abuses which, until now, have gone unchecked.

### **GENERAL ALLEGATIONS**

20. Defendant Chad Readey is a resident of the Village of Flossmoor, located in Cook County, Illinois. He is currently a baseball player at Northwestern University.

21. Plaintiff Jane Doe is a resident of the City of Glenwood, located in Cook County, Illinois. She, too, is currently student at a prestigious university, where she is majoring in Neuroscience and Psychology.

---

<sup>2</sup> At the time that it happened, Ms. Doe told her then-boyfriend that Chad Readey grabbed her breast without her consent. Chad Readey subsequently admitted to grabbing Ms. Doe's breast.

**Chad Readey begins repeated sexual harassment of Ms. Doe in middle school**

22. Chad Readey’s habitual, unwelcome sexual conduct towards Jane Doe dates back to approximately 2015, when they were both middle school students at Parker Junior High School, and approximately 12-years old.

23. Ms. Doe had a brief, child-crush on Chad Readey but she quickly became unattracted to him due to his hypersexual behavior that made her uncomfortable and scared.

24. As just one example, on many occasions, Chad Readey would ask Ms. Doe to send him “nudes” via Snapchat. She denied all of his requests and told her parents.

25. At Parker, Chad Readey would often touch her buttocks and thighs without her consent, then act like it was an accident.

**Chad Readey’s repeated, unwanted sexual conduct continues into high school**

26. On or about 2017, Ms. Doe and Chad Readey matriculated to Homewood-Flossmoor High School.

27. While in high school, Ms. Doe never expressed a romantic or sexual interest in Chad Readey, nor did she spend time with him outside of group, social events.

28. During their sophomore year, between Fall 2018 - Spring 2019, Ms. Doe and Chad Readey were in a driver’s education class together, when Ms. Doe was approximately 15-years old. During class, Chad Readey would engage in the following unwelcome conduct, which Ms. Doe always rejected, including but not limited to:

- a. He asked to “finger” her;
- b. He grabbed her pencil out of her hand, then pulled her hand on his genitals, outside of his pants;
- c. He touched her inner thigh without her consent;
- d. He unzipped her hoodie without her consent, to see if she was wearing anything underneath; and,

e. He asked her to meet him the bathroom to “play.”

29. Another time, Chad Readey told Ms. Doe that while having sex with girls, he liked for them to be silent and “take it.”

**Chad Readey ignores Ms. Doe’s clear demand to stop touching her**

30. Ms. Doe told her friends and family about Chad Readey’s unwelcome sexual conduct in driver’s education class.

31. One day, Ms. Doe gained the courage to finally stand up to Chad Readey: While on the bus, she told him something to the effect of, “You are not allowed to touch me.”

32. In response, Chad Readey said “ok,” then proceeded to grab her breast without her consent. She believed this conduct was sexual assault.

33. Ms. Doe immediately told her brother, as well as her then-boyfriend, and several friends. She did not report the incident to the police or to the school.

34. Ms. Doe decided to remain focused on her education: She was a top student, and also in an international touring choir, and the captain of the co-ed cheerleading squad.

**Homewood-Flossmoor High School opens an investigation, following multiple female students’ complaints of Chad Readey’s sexual misconduct**

35. When Ms. Doe was a junior, on or about Fall 2019 – Spring 2020, she was called into the Dean’s office at Homewood-Flossmoor High School.

36. District Director Dr. Danielle Lusby and Dean of Students Zac Wells proceeded to tell Ms. Doe they were investigating multiple complaints that Chad Readey was sexually harassing female students in the International Baccalaureate (“IB”) Program. They further told her that another student brought to their attention that she, too, was a possible victim of Chad Readey.

37. Ms. Doe proceeded to tell Homewood-Flossmoor officials, for the first time, that Chad Readey had sexually harassed her for years, and when she finally told him to stop, he grabbed her breast without her consent.

38. Ms. Doe then provided a written statement to the school, detailing Chad Readey's years-long harassment and unwelcome touching of her. After providing her statement, she never heard anything more about the investigation.

39. When questioned by the school about Ms. Doe's allegations, Chad Readey admitted to "touching" Ms. Doe's breast, as stated in the school's subsequent letter to his parents. See Exhibit 1.

40. Upon information and belief, despite multiple students' complaints and Readey's admission to grabbing Ms. Doe's breast, Homewood-Flossmoor chose not to punish their star student-athlete.

#### **Chad Readey sues multiple students for defamation, among other things**

41. On or about August 16, 2020, Chad Readey announced his commitment to Northwestern University to play on the baseball team via Twitter.

42. In response to his post, Ms. Doe's ex-boyfriend - who she told about her sexual assault immediately after it happened - replied to the post, "Congrats to someone who's going to Northwestern University but doesn't know and hasn't learned what consent is."

43. Multiple other classmates also commented on Chad Readey's post. Others sent letters and emails to Northwestern. Upon information and belief, one email, dated August 17, 2020, stated, among other things, "Last school year, over 6 girls went to the school administration separately, to report their own sexual assault experiences against Chad...while 6 girls were vocal and reported, there are many more that chose to stay silent out of fear."

44. Ms. Doe did not participate in the social media backlash, nor did she contact Northwestern University, as she just wanted to be able to move on with her life.

45. In response to the backlash, Chad Readey's parents retained a legal team to "restore his good name." Their efforts first included aggressive legal demands for retractions.

46. Then, Chad Readey filed a defamation lawsuit against numerous parties, including Ms. Doe's ex-boyfriend, filed on July 1, 2022.

47. Ms. Doe was not named as a defendant in the above-mentioned defamation lawsuit.

48. In fact, Chad Readey's complaint mentions the incident with Ms. Doe:

Plaintiff was also given an opportunity to respond and admitted the touching but confirmed that he had respected the principle of consent, believing the touching was not unwelcome. Plaintiff indicated that when the student objected to the touching he stopped.

**Years later, Chad Readey has returned to intimidate Ms. Doe**

49. In a perpetual attempt to continue to cause Ms. Doe harm, Chad Readey has returned to continue to intimidate and harass his victim, refusing to let her move on with her life.

50. On December 14, 2022, just days before Ms. Doe was to return home for the holidays, Chad Readey's counsel hand-delivered a letter to Ms. Doe's father at their family home, stating, "This purpose of this letter is to make you aware of the intention to also name you as a Defendant in that action on or before December 30, 2022." See Exhibit 2 – Victor Henderson Letter.

51. Ms. Doe's mother emailed Chad Readey's lawyer, acknowledging receipt of the letter. She asked to have until the first week of January to obtain counsel, given that it was the holiday season and he had only given her a matter of days to properly respond.

52. In response, Chad Readey's lawyer stated, "We are under a deadline to file a lawsuit against your daughter on or around December 31, 2022 and cannot wait to sue your daughter until early January unless you agree 'in writing' to an extension, which will then give you the time to find a lawyer. The extension may also give the parties an opportunity to settle their dispute before a lawsuit is filed."

## **CONCLUSION**

53. Unfortunately, Chad Readey will not let Ms. Doe move on with her life, despite getting away with sexually harassing and assaulting her for years.

54. Now, Chad Readey's campaign to "restore his good name," coordinated by his lawyers through scare tactics and even a visit to her family home, has forced Ms. Doe to seek justice in this Court by filing this Complaint against him.

### **COUNT I Gender Violence Act – 740 ILCS 82**

55. Plaintiff incorporates all paragraphs of this complaint as if fully set forth under this count.

56. Chad Readey violated the Gender Violence Act by committing one or more acts of violence or physical aggression satisfying the elements of battery under the laws of Illinois that were committed, at least in part, on the basis of a plaintiff's sex, as alleged in paragraphs 5, 8, 9, 25, 28 and 32 above.

57. Chad Readey's violation of the Gender Violence Act caused, and continues to cause plaintiff harm, including but not limited to physical and mental injury, anxiety, humiliation, pain and suffering, and severe emotional distress.

WHEREFORE, plaintiff asks this Court to enter judgment in her favor and against Chad Readey, for the damages described herein in an amount in excess of \$50,000, in addition to damages for emotional distress, punitive damages and interest, attorney fees and costs, as well as all other relief this Court deems fair and just.

### **COUNT II Intentional Infliction of Emotional Distress**

58. Chad Readey's unwelcome sexual conduct towards plaintiff as described in paragraphs 5, 8, 9, 25, 28, and 32 was extreme and outrageous conduct.



59. Chad Readey's renewed efforts to harass and intimidate plaintiff as described in paragraphs 50 and 52 is extreme and outrageous conduct.

60. Chad Readey intended to cause or recklessly or consciously disregarded the probability of causing emotional distress by:

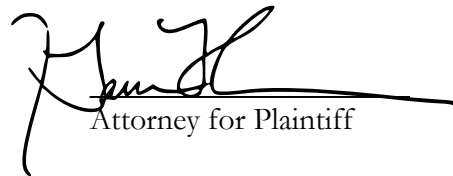
- a. Sexually harassing and sexually assaulting plaintiff when they were students at Parker Middle School;
- b. Sexually harassing and sexually assaulting plaintiff when they were students at Homewood-Flossmoor High School;
- c. Grabbing plaintiff's breast when she instructed him to stop touching her;
- d. Engaging in intimidation tactics, including threats to file a defamation lawsuit against her, despite admitting to his nonconsensual conduct.

61. As a direct and proximate result of the above-described actions, plaintiff was and continues to be harmed, suffering severe emotional distress.

WHEREFORE, plaintiff asks this Court to enter judgment in her favor and against Chad Readey, for her damages in an amount in excess of \$50,000, plus interest and reimbursement for the costs of litigation, as well as all other relief this Court deems fair and just.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY.

Respectfully submitted,

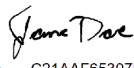


Attorney for Plaintiff

Tamara Holder  
The Law Firm of Tamara N. Holder LLC  
917 W. Washington Blvd., Suite 222  
Chicago, Illinois 60607  
312-440-9000  
tamara@tamaraholder.com  
Cook County Attorney No. 41895

## VERIFICATION

I, Jane Doe, under penalties provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, hereby certify that I have read the foregoing Verified Complaint; that the factual statements set forth in this Verified Complaint are true and correct, except for those alleged on information and belief; and that I am informed and I believe that the statements set forth on information and belief are also true.

DocuSigned by:  ged on information  
C21AAF65307B4D5...

---

JANE DOE

# EXHIBIT 1



Homewood-Flossmoor High School

999 Kedzie, Flossmoor · 708-799-3000 · hfhighschool.org



September 18, 2020

[REDACTED]  
[REDACTED]

Dear [REDACTED]:

As you are aware, eight current and former students sent emails and made social media posts directed at Northwestern alleging your son, [REDACTED], has a history of sexual assault and sexual harassment that has been reported to Homewood-Flossmoor Community High School District No. 233, but has not been addressed. As a result of these reports, we investigated these claims. Our investigation included an extensive review of records including: the student records of the women who contacted Northwestern; the student records of the girls named by the women who contacted Northwestern; the student records of the students in the H-F International Baccalaureate (IB) Program (a small, honors program in which [REDACTED] participates); [REDACTED] student records; and the District's email server. As part of the investigation, we reviewed hundreds of emails that mentioned [REDACTED] or the other students to determine if there were any emails that substantiated the claims sent to Northwestern. Additionally, we interviewed several current and former staff members. After concluding our exhaustive search, the District has no record that substantiates the claims made by the women who contacted Northwestern.

The women who reported claims of sexual harassment to Northwestern may be aware of two incidents that involved [REDACTED], but the District did investigate these incidents and determined neither incident constituted sexual harassment or sexual assault. [REDACTED] was not disciplined for either incident.

During the 2019-2020 school year, some of the women in the IB program with [REDACTED] complained about a group of men in the program that were inappropriate. The women claimed that the men made inappropriate statements about women's bodies, made comments that were misogynistic and degrading, and generally bullied the girls based on their gender. The incident was investigated by the District, and several statements were taken from both the men and the women involved. The District determined that the behavior of the men was inappropriate, but did not find the behavior to be sexual harassment. Both the men and women were referred through the District's restorative justice model to resolve the incident and no further complaints were filed. In reviewing the documents of this investigation, it is important to note that [REDACTED] is included within the group of men in question, but none of the specific allegations of harassment in the IB program were against [REDACTED]. The women did raise more specific allegations against two other male students in the group.

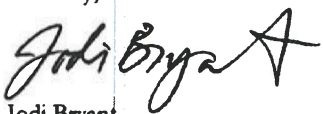
Second, two years prior, during [REDACTED] sophomore year, [REDACTED] allegedly touched a female student's breast over her clothing on a school bus. The student did not report the incident when it happened, but did report the incident nearly a year later to a teacher who then met with the student and her school counselor. At the time, the student told the teacher and counselor that the issue had been resolved a year ago and that she did not want further investigation into the matter as there had been no further incidents or concerns related to this student. During the IB investigation in 2019-2020, the allegation of [REDACTED] touching a woman's breast

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over her clothing during his sophomore year was raised by one of the IB women who was a friend of the woman involved. The woman involved was not an IB student and was not automatically part of that investigation, but was called in to make a statement about the bus incident and [REDACTED] was given the opportunity to respond. [REDACTED] admitted to touching the student's breast over her clothing during a lapse of judgement while they were riding a shuttle bus together, and when she objected to him touching her, he stopped and there have been no further incidents over the past two years.

As explained above, after a thorough and exhaustive investigation, we have no evidence that supports the allegations made by current and former students to Northwestern regarding [REDACTED]. None of the incidents that were reported were considered sexual harassment or sexual assault by the administrators investigating. Accordingly, we consider this matter closed.

Sincerely,



Jodi Bryant  
Director of Human Resources & Public Relations



Craig Fantin  
Associate Principal

# EXHIBIT 2

# hendersonPARKS

The Marquette Building  
140 South Dearborn Street | Suite 1020 | Chicago, IL 60603  
T 312.262.2900 | F 312.262.2901  
Henderson Parks, LLC | [www.henderson-parks.com](http://www.henderson-parks.com)

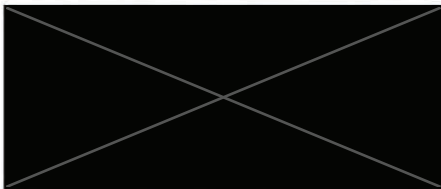
Victor P. Henderson

(312) 262-2900


[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)

December 14, 2022

VIA HAND DELIVERY



*Re: Chad Readey v. Justin Libretti-Rivers, et al.*

Dear Ms. 

Please be advised that this firm represents Chad Readey, who is the Plaintiff in a case pending in the Cook County Circuit Court (No. 2022 L 005944); see enclosed complaint. This purpose of this letter is to make you aware of the intention to also name you as a Defendant in that action on or before December 30, 2022. You are advised to promptly obtain legal counsel.

If you or your legal counsel would like to explore alternatives to naming you in the lawsuit, please contact this office by no later than close of business (5:00pm), on December 21, 2022. If you are unable to obtain legal counsel by December 21st, please call this office to discuss your options. If we do not hear from you or your counsel by that time, we will proceed with filing Mr. Readey's legal claims against you.

We can be contacted at 312-262-2900.

Sincerely,

HENDERSON PARKS, LLC



Victor P. Henderson

VPH/cs

Enclosure

cc: Kimberly N. Tarver, Esq.

**EXHIBIT 15**

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- Today, Jane Doe filed a complaint that seeks to end the toxic pattern in America where star student-athletes get to hide behind their elite schools and proud parents as they sexually abuse women, then intimidate and fight them when they speak out.
- Upon information and belief, on or about the Fall 2019 - Spring 2020 school year, at least six (6) Homewood-Flossmoor High School students reported to the Dean's office that the defendant in this case, classmate Chad Readey - who is now a baseball player at Northwestern - was engaging in sexually abusive conduct towards them. The school opened an



classmate Chad Readey - who is now a baseball player at Northwestern - was engaging in sexually abusive conduct towards them. The school opened an "investigation" into their star student-athlete.

- The plaintiff in this case, Jane Doe, was not one of the students who initially reported Chad Readey, although she had been sexually harassed and touched without her consent by him for years, beginning when they were both students at Parker Junior High School, beginning on or about Fall 2015 – Spring 2016.
- A star student in her own right, Ms. Doe chose not to report Chad Readey or seek legal action against her perpetrator.[1] She did, however, tell close friends and family about his unwelcome, hyper-sexualized behavior throughout the years.
- During the "investigation," the complaining female students told Homewood-Flossmoor officials that Ms. Doe, too, had information about Chad Readey. As a result, Ms. Doe was called into the Dean's office for questioning.
- Then just 16-years old, Ms. Doe told officials that Chad Readey habitually



into the Dean's office for questioning.

- Then just 16-years old, Ms. Doe told officials that Chad Readey habitually sexually harassed her and touched her without her consent over the course of several years. She also provided the school with a detailed a written statement.
- Among other things, Ms. Doe stated that, during their sophomore year, on or about Fall 2018 – Spring 2019, when she was just 15-years old, she clearly instructed Chad Readey to stop touching her. In response, he grabbed her breast without her consent. Ms. Doe told Homewood-Flossmoor officials that she believed this conduct was sexual assault.
- Chad Readey admitted to officials that he did, indeed, grab Ms. Doe's breast, as stated in a letter Homewood-Flossmoor sent to his parents. See Exhibit 1 – Homewood-Flossmoor Letter.
- After taking her statement, Ms. Doe never heard back from Homewood-Flossmoor officials.
- Upon information and belief, Homewood-Flossmoor chose not to punish Chad Readey and instead closed their investigation.



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- Chad Readey admitted to officials that he did, indeed, grab Ms. Doe's breast, as stated in a letter Homewood-Flossmoor sent to his parents. See Exhibit 1 - Homewood-Flossmoor Letter.
- After taking her statement, Ms. Doe never heard back from Homewood-Flossmoor officials.
- Upon information and belief, Homewood-Flossmoor chose not to punish Chad Readey and instead closed their investigation.
- Then, on August 16, 2020, Chad Readey posted on Twitter that he had committed to Northwestern University, where he would play baseball.
- In response, numerous classmates - people who personally knew Chad Readey - publicly exposed the allegations that had been levied against him during high school.
- Doe was not one of those commenters, instead choosing to focus on her own upcoming admission to college.
- In response to the comments, Chad Readey - presumably by way of his parents' pocketbook - hired lawyers to send threatening letters to his classmates demanding retractions



- In response to the comments, Chad Readey - presumably by way of his parents' pocketbook - hired lawyers to send threatening letters to his classmates, demanding retractions drafted by the lawyers.
- Then, nearly two years later, in July 2022, Chad Readey filed a defamation lawsuit against several classmates, including but not limited to Ms. Doe's then-boyfriend, who commented, "Congrats to someone who's going to Northwestern but doesn't know and hasn't learned what consent is."<sup>[2]</sup>
- Despite admitting to sexually assaulting Ms. Doe - both to the school, as well as in his own defamation complaint against others - Chad Readey has now returned, years later, to intimidate Ms. Doe and her parents via his lawyers, with threats to add her as a defendant to his defamation lawsuit.
- As a result, Chad Readey has left Ms. Doe with no choice but to file this lawsuit, in an attempt to finally seek justice for his abuses which, until now, have gone unchecked.

<sup>[1]</sup> Ms. Doe's failure to report is not uncommon. In fact, the Illinois General



abuses which, until now, have gone unchecked.

[1] Ms. Doe's failure to report is not uncommon. In fact, the Illinois General Assembly acknowledges that, "Sexual assault and sexual abuse are personal and violent crimes that disproportionately impact women, children, lesbian, gay, bisexual, and transgender individuals in Illinois, yet only a small percentage of these crimes are reported, less than one in five, and even fewer result in a conviction." See 725 ILCS 203/5.

[2] At the time that it happened, Ms. Doe told her then-boyfriend that Chad Readey grabbed her breast without her consent. Chad Readey subsequently admitted to grabbing Ms. Doe's breast.

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**EXHIBIT 16**

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**Tama...**  · Dec 29, 2022

Info on Jane Doe's lawsuit filed against former [@HFHSAthletics](#) [@HFHS59](#) baseball player Chad Readey who is now at [@NorthwesternU](#).  
[tamaraholder.com/gender-violenc...](https://tamaraholder.com/gender-violenc...)







**Tamara...**  @ta... · Dec 30, 2022

Info on Jane Doe's lawsuit filed against former [@HFHSAthletics](#) [@HFHS59](#) baseball player Chad Readey who is now at [@NorthwesternU](#).



[tamaraholder.com](http://tamaraholder.com)

**GENDER VIOLENCE ACT LA...**

Today, Jane Doe filed a complaint that seeks to end



**EXHIBIT 17**

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http://www.twitter.cc Go **OCT** **JAN** FEB

**04**

**33 captures**

23 Jun 2011 - 9 Feb 2023

2021 **2023** 2024



**Tamara...** @ta... · Dec 30, 2022

Info on Jane Doe's lawsuit filed against former @HFHSAthletics @HFHS59 baseball player Chad Readey who is now at @NorthwesternU.



tamaraholder.com  
GENDER VIOLENCE ACT LA...  
Today, Jane Doe filed a  
complaint that seeks to end

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**EXHIBIT 18**

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**Jacob Christner**  @JakeThePundit · Jan 5

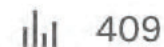


[@sidelinesport1](#) [@jennacheryl](#) Think we have a Pundit topic next week.  
There is a definite conversation to this one



**Tamara Holder-DeMaio** @tamaraholder · Dec 29, 2022

Info on Jane Doe's lawsuit filed against former @HFHSAthletics  
@HFHS59 baseball player Chad Readey who is now at  
[@NorthwesternU.tamaraholder.com/gender-violenc..](https://www.tamaraholder.com/gender-violenc..)



**EXHIBIT 19**

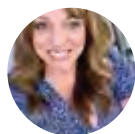
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Homewood-Flossmoor, IL

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# Gender Violence Lawsuit: HFHS Grad Sues Northwestern's Readey

After the college baseball player filed a defamation suit, a former classmate is suing, citing intentional infliction of distress.

Lauren Traut, Patch Staff 

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A HFHS grad is suing a former classmate claiming violation of Illinois Gender Violence Act and intentional infliction of emotional distress. (Courtesy of Homewood-Flossmoor High School )

**FLOSSMOOR, IL — A former**

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female student is suing a former male classmate alleging intentional infliction of emotional distress tied to what she says are incidents of sexual harassment and abuse during their time at the school. The allegations became public as he committed to playing baseball at Northwestern University.

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The player—Chad Readey, of Flossmoor—has also filed a defamation lawsuit against several classmates who took to the university's social media to hint at similar allegations made against Readey by other students during his time at the suburban high school.

The female student—named in the lawsuit as only Jane Doe—alleges Readey violated the Illinois Gender

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Violence Act, in addition to the claim of intentional emotional distress.

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Doe's lawsuit claims Readey has attempted to "intimidate" Doe and her parents with threats to name her as a defendant in his defamation lawsuit

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Doe's lawsuit alleges that during their time as classmates at both Parker Junior High and later Homewood-Flossmoor High School, Readey "habitually sexually harassed her and touched her without her consent. "

## ADVERTISEMENT

The female student's claims date back to 2015, alleging incidents of inappropriate and non-consensual sexual touching by Readey over the course of several years, including

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buttocks. Readey would also ask Doe to send him “nudes” via Snapchat, the complaint alleges, with Doe denying all of his requests and telling her parents.

The incidents escalated, Doe claims, with Readey later reportedly grabbing her breast over her clothing while on the school bus during their sophomore year, 2018–2019—after Doe recalls telling him, "You are not allowed to touch me."

## ADVERTISEMENT

Doe did not report the incidents to school officials, but was later called to the school office after Homewood-Flossmoor High School opened an investigation, following multiple female students' complaints accusing Readey of sexual misconduct. She issued a statement to the school

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Readey; Readey later admitted to "touching" Doe's breast, which officials disclosed in a letter to his parents.

In his defamation suit, Readey admitted to touching Doe, but claimed he "(believed) the touching was not unwelcome."

Homewood-Flossmoor High School at the time closed the investigation without disciplinary action against Readey, noting in a letter that "none



were considered sexual harrassment or assault."

The lawsuit also details other instances of alleged abuse by Readey during class in the Fall of 2018 and Spring of 2019. Doe's lawsuit alleges Readey allegedly asked to "finger" her, and "then pulled her hand on his genitals, outside of his pants."

Readey also reportedly unzipped her hoodie without consent to "see if she was wearing anything underneath."

Homewood-Flossmoor District 233 Superintendent Scott Wakeley on Jan. 5, 2023 declined to comment on Doe's lawsuit, saying only, "the school is not a party to the lawsuit, and we do not comment on student matters of this nature."

## **Claims Surface Via Social Media**

Readey declared his commitment to attend Northwestern University in August 2020, which led to several former classmates sharing

emailing Northwestern with their claims.

"Congrats to someone who's going to Northwestern but doesn't know and hasn't learned what consent is," one wrote on the social media post.

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Eight current and former HFHS students at the time had contacted Northwestern University with concerns over the allegations against Readey. In a letter from school officials to Readey's parents dated

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investigated the claims by reviewing the emails, as well as interviewing current and former staff members. The District wrote in the letter that after its "exhaustive search, the District has no record that substantiates the claims made by the women who contacted Northwestern."

Readey has since consulted a lawyer and in September 2022 filed a defamation suit against those he says were involved in the social media

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Readey has since threatened to also name her in his suit, described as an "attempt to restore his good name that offers smeared."

Doe's lawyer said her lawsuit is a "simple case" that attempts to end a pattern.

"This is a complaint that seeks to end the toxic pattern in America where star student-athletes get to hide behind their elite schools and proud parents as they sexually abuse

them when they speak out," the suit states.

In a statement [issued to Deadspin,](#) [Readey's attorney Victor Henderson](#) [said Readey,](#) "has been the victim of a vicious, coordinated effort to assassinate his character based on falsehoods, eliminate his college possibilities, and destroy his future." He added that because the accusations were made publicly on social media, "we had no choice but to pursue legal action to continue to

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## ADVERTISEMENT

Doe's attorney Tamara N. Holder said she intends to depose school officials who handled the allegations against Readey, adding that by not taking disciplinary measures, they "perpetuated the harm.

"We believe that had they taken proper action, that it would have stopped at that point," Holder said.

"The school sitting in the place of the parent, they had the authority and ability to properly punish him, and

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they did not, which allowed him to perpetuate the harm."

The school's alleged mishandling of the claims creates concern of a firm definition of sexual harassment or assault, Holder said.

"I want to find out how this school defines sexual harassment by students," she said.

Holder is seeking damages in excess of \$50,000 for her client.

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Readey's attorney is seeking a similar amount.

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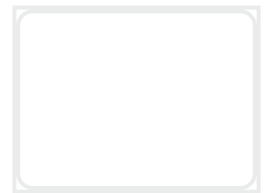
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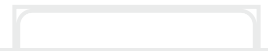
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**EXHIBIT 20**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

# Northwestern baseball player sued for intentional infliction of emotional distress, violation of Gender Violence Act [Updated]

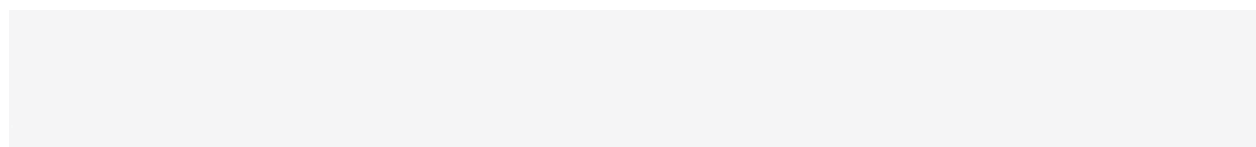
Lawsuit accuses Chad Readey of using defamation suit to harass and intimidate his accusers

By

**Julie DiCaro**

Published Yesterday 4:30PM

Alerts



Chad Readey Photo: Twitter/Northwestern Athletics

A woman filed a lawsuit against Northwestern baseball player Chad Readey, alleging violations of the Illinois Gender Violence Act and intentional infliction of emotional distress stemming from what she says were incidents of sexual harassment and abuse going back to the time the two were students in junior high and at Homewood Flossmoor High School in suburban Chicago.

## **Allegations of sexual misconduct**

The woman, who filed the complaint in Cook County, Ill., under the pseudonym “Jane Doe,” alleged numerous incidents of inappropriate and non-consensual sexual touching by Readey over the course of several years, including his touching her thighs and buttocks without her consent while the pair was still in junior high school. According to the complaint, Readey’s behavior worsened on a school bus ride when both students were in high school, claiming:

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“Ms. Doe stated that, during their sophomore year, on or about Fall 2018 – Spring 2019, when she was just 15-years old, she clearly instructed Chad Readey to stop touching her. In response, he grabbed her breast without her consent. Ms. Doe told Homewood-Flossmoor officials that she believed this conduct was sexual assault.”

While Doe did not report Readey’s alleged behavior to school officials, the lawsuit claims she did speak about his “hypersexualized” interactions with her, which left her “uncomfortable and scared,” to friends and family. However, as the suit goes on to allege, when Doe was a high school student, officials at HFHS summoned her to the office, telling her that an investigation into Readey’s behavior had been opened after eight current and former students made social media allegations claiming that Readey had a history of sexual harassment and assault of other students.

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Deadspin was able to verify a letter from HFHS to Readey's parents dated Sept. 18, 2020, which states:

“As you are aware, eight former and current students made social media posts directed at Northwestern alleging your son, [Readey], has a history of sexual assault and sexual harassment that has been reported to HFHS District No, 233, but has not been addressed.”

The letter goes on to lay out the reasons the school found no evidence of misconduct by Readey, reading in part:

“(T)wo years prior, during [Readey's] sophomore year, [Readey] allegedly touched a female student's breast over her clothing on a school bus. The student did not report the incident when it happened, but did report the incident nearly a year later to a teacher who then met with the student and her school counselor. At the time, the student told the teacher and counselor that the issue had been resolved a year ago and that she did not want further investigation into the matter as there had been no further incidents or concerns related to this student. During the IB investigation in 2019 2020

(sic), the allegation of [Readey] touching a woman's breast over her clothing during her sophomore year was raised by one of the IB women who was a friend of the woman involved, The woman involved was not an IB student and was not automatically part of the investigation, but was called into make a statement about the bus incident and [Readey] was given an opportunity to respond. [Readey] admitted to touching the student's breast over her clothing during a lapse of judgement (sic) while they were riding a shuttle bus together, and when she objected to him touching her, he stopped and there have been no further incidents in the past two years."

HFHS then closed the investigation without taking disciplinary action against Readey.

However, Doe's complaint sets forth multiple instances of alleged abuse by Readey during their Drivers' Education class together in the Fall of 2018 and Spring of 2019, including Readey asking to "finger" her, Readey grabbing a pencil out of her hand and pulling her hand onto his genitals, and Readey unzipping her hoodie without consent to "see if she was wearing anything underneath." Doe claims she finally summoned the courage to stand up to Readey on the school bus, telling him, "You are not allowed to touch me. In response, the complaint alleges that Readey said, "Okay," and then proceeded to grab Doe's breast over her clothing and without her consent.

## **Readey's defamation lawsuit**

After students began posting about allegations against Readey on social media and directly emailing Northwestern, Readey hired an attorney to respond to their claims. The lawsuit alleges that the lawyers "sent threatening letters to [Readey's] classmates, demanding retractions." Per the lawsuit, Doe did not participate in the social media campaign against Readey, but received notice on December 14, 2022, that Readey intended to name her as a

defendant in a defamation lawsuit he filed in Cook County, presumably due to her cooperation with HFHS in the investigation into the allegations against Readey. Deadspin was able to view the letter from Readey's attorney informing Doe that she was to be added as a defendant to Readey's defamation claim, which was filed in September of 2022. In that lawsuit, Readey alleges that multiple students, both named and unnamed, conspired to ruin his reputation and his relationship with Northwestern by concocting false incidents of sexual harassment and abuse, stating "vicious and demonstrably false statements were made about Readey; namely, that he committed 'multiple sexual assaults,' when in fact there were none."

The woman's complaint alleges that "despite admitting to sexually assaulting Ms. Doe — both to the school, as well as in his own defamation complaint against others — Chad Readey has now returned, years later, to intimidate Ms. Doe and her parents via his lawyers, with threat to add her as a defendant to his defamation lawsuit."

"We look forward to deposing Homewood-Flossmoor officials to find out how they define consent, and why the school chose not to punish its star athlete despite complaints from numerous female students," Tamara Holden, Doe's attorney, told Deadspin.

"Ultimately, we intend to shine a light on how young women are silenced at an early age and how schools are complicit in sexual violence against young women."

Deadspin reached out to both Readey's attorney and Northwestern University for comment. At the time of publication, we had not received a response.

**[Update]:** After this story went to publication, Northwestern University advised Deadspin that the school could not provide comment.

Chad Readey's attorney, Victor Henderson, provided Deadspin with the following statement Wednesday evening:

“For over two years, Chad Readey has been the victim of a vicious, coordinated effort to assassinate his character based on falsehoods, eliminate his college possibilities, and destroy his future. Lies alleged about Chad have already been retracted, and a subsequent investigation concluded there was no merit to any accusation against him. Unfortunately, the damage to his reputation remains, and these latest fabrications only cause further harm. Since these accusations were made publicly and still live on social media, we had no choice but to pursue legal action to continue to clear Chad's name. We will not sit by and allow such damaging falsehoods to keep circulating.”



**EXHIBIT 21**



FILED DATE: 8/28/2023 3:51 PM 2023L008661



# WOMEN'S LACROSSE

Schedule

## 2023 Women's Lacrosse Roster


2023
Jump to Coaches 

NO.	NAME	POS.	HT.	YEAR	HOMETOWN	HIGH SCHOOL	PREVIOUS
1	Rachel Weiner	A	5' 3"	Fy.	Parkland, Fla.	North Broward Prep	
2	Erin Coykendall	A	5' 5"	Sr.	Spencerport, N.Y.	Spencerport HS	
3	Eve Hritzuk	A	5' 3"	Sr.	Sherwood Park, Alberta	Vimy Ridge Academy	
4	Jane Hansen	M	5' 7"	Sr.	Cohasset, Mass.	Cohasset HS	
5	Claire Snyder	M	5' 7"	Jr.	Surrey, British Columbia	Semiahmoo Secondary	
6	Allie Berkery	D	5' 6"	Gr.	Bronxville, N.Y.	Bronxville	
7	Elle Hansen	A	5' 7"	Gr.	Cohasset, Mass.	Cohasset HS	
8	Megan Mallgrave	D	5' 11"	So.	Summit, N.J.	St. Paul's School	
9	Hannah Johnson	M	5' 2"	Jr.	Baldwinsville, N.Y.	Charles W Baker HS	
10	Dylan Amonte	A	5' 8"	Sr.	Norwell, Mass.	Thayer Academy	
11	Abby LoCascio	A	5' 8"	Fy.	Lindenhurst, N.Y.	Saint Anthony's HS	

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WOMEN'S LACROSSE

Schedule

11	<b>Abby LoCascio</b>	A	5' 8"	Fy.	Lindenhurst, N.Y.	Saint Anthony's HS	
13	<b>Katie Shanley</b>	D	5' 5"	Sr.	Fayetteville, N.Y.	Fayetteville Manlius	
14	<b>Kiera Shanley</b>	A	5' 6"	Sr.	Fayetteville, N.Y.	Fayetteville Manlius	
15	<b>Kathryn Welch</b>	D	5' 7"	Fy.	Pearl River, N.Y.	Phillips Exeter Academy (N.H.)	
16	<b>Carli Fleisher</b>	A	5' 4"	Fy.	Parkland, Fla.	American Heritage HS	
18	<b>Leah Holmes</b>	A	5' 6"	Jr.	Larchmont, N.Y.	Hackley School	
19	<b>Samantha Smith</b>	M	5' 7"	So.	Mill Valley, Calif.	Tamalpais HS	
20	<b>Logan Lillie</b>	GK	5' 6"	Sr.	Moorestown, N.J.	Moorestown HS	
21	<b>Johanna Kingsfield</b>	D	5' 10"	Sr.	Wheaton, Ill.	Montini Catholic HS	
22	<b>Serafina DeMunno</b>	M	5' 10"	So.	Barrington, Ill.	Saint Viator College Prep	
23	<b>Samantha White</b>	D	5' 6"	So.	Baltimore, Maryland	Dulaney HS	
24	<b>Kendall Halpern</b>	D	5' 8"	Jr.	Woodbury, NY	Syosset HS	
25	<b>Madison Taylor</b>	A	5' 6"	Fy.	Wantagh, N.Y.	Wantagh HS	
27	<b>Izzy Scane</b>	A	5' 7"	Gr.	Clarkston, Mich.	Cranbrook Kingswood	
28	<b>Maddy Balter</b>	M	5' 3"	Sr.	Wellesley, Mass.	Wellesley HS	
29	<b>Carleigh Mahoney</b>	D	5' 8"	Jr.	Mendham, NJ	West Morris Mendham HS	
32	<b>Molly Laliberty</b>	GK	5' 4"	Gr.	Newburyport, Mass.	Newburyport HS	Tufts
33	<b>Lucy Munro</b>	A	5' 5"	Fy.	Highlands Ranch, Colo.	ThunderRidge HS	

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WOMEN'S LACROSSE

Schedule / Ro

24	<b>Kendall Halpern</b>	D	5' 8"	Jr.	Woodbury, NY	Syosset HS	
25	<b>Madison Taylor</b>	A	5' 6"	Fy.	Wantagh, N.Y.	Wantagh HS	
27	<b>Izzy Scane</b>	A	5' 7"	Gr.	Clarkston, Mich.	Cranbrook Kingswood	
28	<b>Maddy Balter</b>	M	5' 3"	Sr.	Wellesley, Mass.	Wellesley HS	
29	<b>Carleigh Mahoney</b>	D	5' 8"	Jr.	Mendham, NJ	West Morris Mendham HS	
32	<b>Molly Laliberty</b>	GK	5' 4"	Gr.	Newburyport, Mass.	Newburyport HS	Tufts
33	<b>Lucy Munro</b>	A	5' 5"	Fy.	Highlands Ranch, Colo.	ThunderRidge HS	
35	<b>Natalie Lopez</b>	D	5' 3"	Jr.	New Canaan, Conn.	New Canaan HS	
40	<b>Karly Keating</b>	M	5' 6"	So.	Elmhurst, Ill.	Benet Academy	
44	<b>Hannah Gillespie</b>	D	5' 8"	Sr.	Newtown Square, Pa.	Academy of Notre Dame de Namur	
45	<b>Emerson Bohlig</b>	M	5' 6"	So.	Orinda, Calif.	Miramonte HS	
55	<b>Francesca Argentieri</b>	GK	5' 4"	Fy.	Syracuse, N.Y.	Westhill HS	
58	<b>Cara Nugent</b>	GK	5' 7"	So.	Boxford Mass.	Governor's Academy	
77	<b>Hailey Rhatigan</b>	A	5' 7"	Gr.	Holbrook, N.Y.	Sachem North HS	Mercer
88	<b>Daniella Stroup</b>	A	5' 5"	Sr.	Port Coquitlam, British Columbia	Riverside Secondary School	

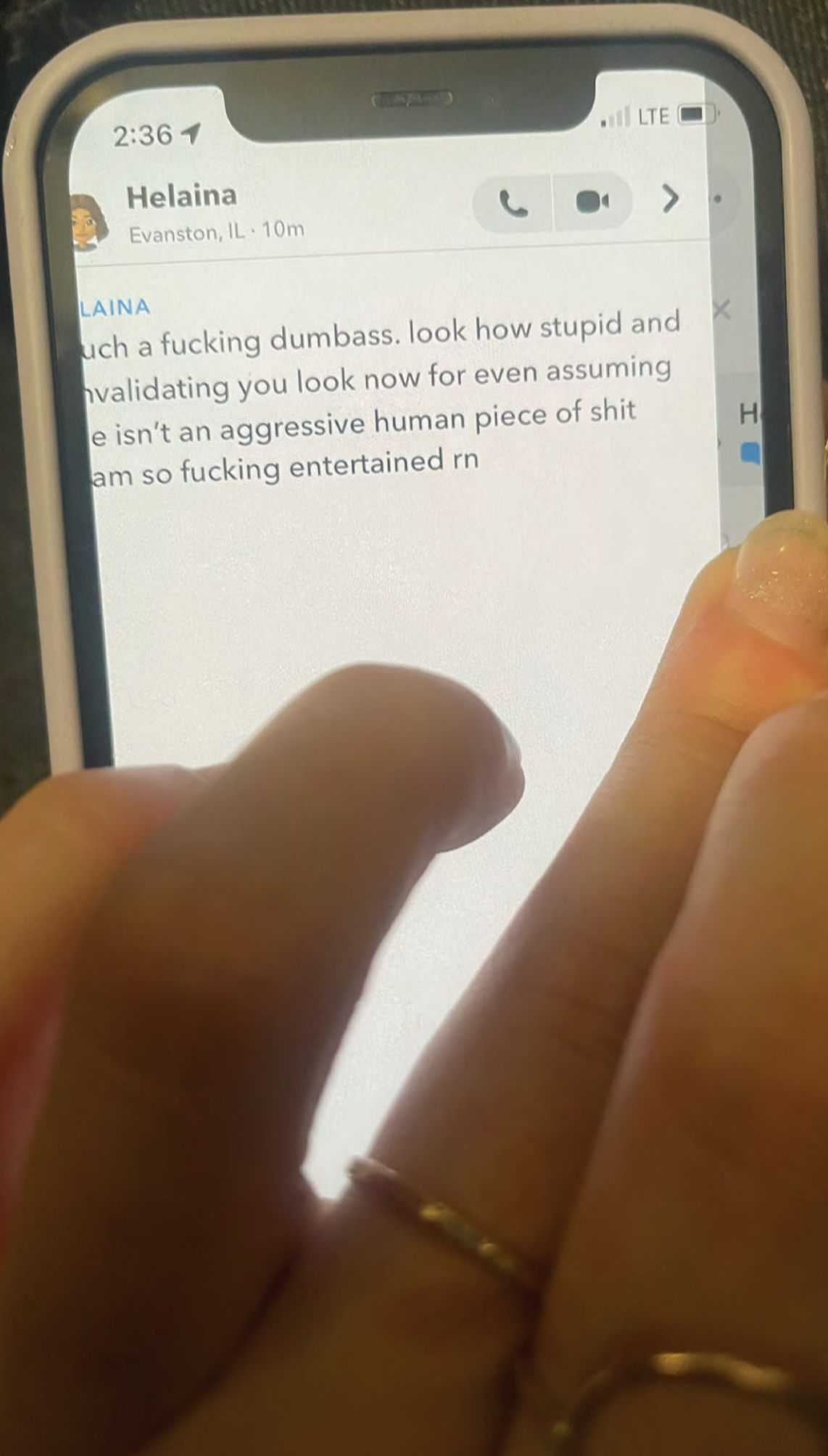
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**EXHIBIT 22**

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2:36



**Helaina**

Evanston, IL · 10m



LAINA

uch a fucking dumbass. look how stupid and  
nvalidating you look now for even assuming  
e isn't an aggressive human piece of shit  
am so fucking entertained rn



H



1:42

LTE



Helaina

Evanston, IL · 23m



TODAY

HELAINA

hey you break up with your rapist boyfriend yet?

heard there's some articles and he's finally not getting away w shit!! 🙄

**EXHIBIT 23**

FILED DATE: 8/28/2023 3:51 PM 2023L008661





- Today, Jane Doe filed a complaint that seeks to end the toxic pattern in America where star student-athletes get to hide behind their elite schools and proud parents as they sexually abuse women, then intimidate and fight them when they speak out.
- Upon information and belief, on or about the Fall 2019 - Spring 2020 school year, at least six (6) Homewood-Flossmoor High School students reported to the Dean's office that the defendant in this case, classmate Chad Readey - who is now a baseball player at Northwestern - was engaging in sexually abusive conduct towards them. The school opened an "investigation" into their star student-athlete.
- The plaintiff in this case, Jane Doe, is not one of the students who reported Chad Readey. She had been sexually harassed and touched without her consent by him for years, beginning when they were both students at Parker Junior High School, beginning on or about Fall 2015 - Spring 2016.

**finally got what you  
deserve, a terrible  
embarrassment of a  
person**

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**EXHIBIT 24**

FILED DATE: 8/28/2023 3:51 PM 2023L008661

# THE LAW FIRM OF TAMARA N. HOLDER, LLC, UNVEILS FIRST BILLBOARD IN CHICAGO

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NEWS PROVIDED BY

**The Law Firm of Tamara N. Holder, LLC** →

08 Aug, 2023, 09:00 ET

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## ***Nationally Recognized Women's Rights and Civil Rights Attorney Debuts New Ad Following Successful Cases Against Major Corporations***

CHICAGO, Aug. 8, 2023 /PRNewswire/ -- Nationally recognized women's rights attorney Tamara Holder unveiled her first billboards in Chicago on Friday. The billboard, located on the corner of N. Clark St and W. Chicago Ave., marks a significant milestone for the accomplished Chicago-based attorney who refuses to be silenced in her pursuit to end sexual abuse, discrimination, and institutional abuse.

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**The billboard marks a significant milestone for the accomplished Chicago-based attorney**



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Tamara Holder's Billboard on the corner of N. Clark St and W. Chicago Ave in Chicago.

Tamara takes on cases against some of America's largest and most well-known corporations: Amazon, Allied Security, Ace Hotel, NorthShore University HealthSystem, Twin Peaks Restaurants, iHeartRadio, Zep, Inc., Blue Bird Bus Corporation, and Republic Services.

Tamara's practice is focused on doctor-patient sexual abuse, sexual harassment and discrimination in the workplace, and other important women's rights issues.

"I am determined to help women heal," said Tamara Holder. "So many women have been abused in their workplace, in their doctor's office, at a fraternity house...the list goes on. I am humbled to be able to help women seek the justice and compensation they deserve. I am also determined to work with corporations to create protections for women in their workplace."

**About The Law Firm of Tamara N. Holder, LLC.**

Founded in 2005, and based in Chicago, The Law Firm of Tamara N. Holder, LLC., is a boutique practice focused on women's rights and sexual abuse. Ms. Holder was a progressive legal analyst on Fox News Channel for nearly a decade. Ms. Holder has testified before Congress, received clemency for convicted felons, and worked with countless individuals throughout her 18+ year career on a variety of civil rights issues. She was recognized by The Chicago Sun Times as "One of 50 People Who Make Chicago a Better Place."

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SOURCE The Law Firm of Tamara N. Holder, LLC

**EXHIBIT 25**

FILED DATE: 8/28/2023 3:51 PM 2023L008661



tamara\_holder

**Back to this:**

The federal suit, filed by attorney Tamara Holder, states that the baseball player admitted to the action in writing to school officials.

The baseball player's attorney filed an objection to the county suit, challenging the plaintiff's right to file the suit anonymously.

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Chicago Tribune



# Northwestern lacrosse player's lawsuit charges school was warned about baseball player whom she says sexually assaulted her

By Robert McCoppin and Jonathan Bullington

Chicago Tribune

Published: Aug 11, 2023 at 7:28 pm

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Chicago Tribune



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A Northwestern University lacrosse player has filed a federal negligence lawsuit claiming that the school was warned about a baseball player whom she accuses of sexually assaulting her.

“Rather than take measures to protect Jane Doe, and other students ... as obligated by federal law and its own student handbook – Northwestern instead ignored the warnings, and admitted him anyway,” the suit states.

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## Northwestern lacrosse player's lawsuit charges school was warned about baseball player whom she says sexually assaulted her

By Robert McCoppin and Jonathan Bullington  
Chicago Tribune

A Northwestern University lacrosse player has filed a federal negligence lawsuit claiming that the school was warned about a baseball player whom she accuses of sexually assaulting her.

The federal suit, filed by attorney Tamara Holder, states that the baseball player admitted to the action in writing to school officials.

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# Northwestern lacrosse player's lawsuit charges school was warned about baseball player whom she says sexually assaulted her

By Robert McCoppin and Jonathan Bullington  
Chicago Tribune

A Northwestern University lacrosse player has filed a federal negligence lawsuit claiming that the school was warned about a baseball player whom she accuses of sexually assaulting her.

The federal suit, filed by attorney Tamara Holder, states that the baseball player admitted to the action in writing to school officials.



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Tamara Holder-DeMaio · 5h ago



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**We have filed a lawsuit against Northwestern**

**CRAIN'S CHICAGO BUSINESS**

"We are determined to end the cycle of institutional abuse. Northwestern can no longer hide from their public-facing elitism and secret coverups," Tamara Holder, an attorney representing the plaintiff, said in a statement to Crain's.

Northwestern didn't respond to requests for comment on the lawsuit.



**A new lawsuit against Northwestern alleges inaction on report of sexual assault**

Tamara Holder-DeMaio · 1d ago

By Brandon Dupré

We have filed a lawsuit against Northwestern on behalf of a female athlete who alleges the school put her in harm's way, then ignored her when she complained. Please contact me if you have any info: 312-440-9000 #northwestern #northwesternwildcats #evanston #evanstonillinois #chicago #womensrights

28



1



0



1



less

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**EXHIBIT 26**

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312-440-9000

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## IN THE NEWS

### TAMARA HOLDER & TEAM FILE LAWSUIT AGAINST NORTHWESTERN ON BEHALF OF LACROSSE PLAYER



August 10, 2023 01:33 P

Tamara Holder & Team have filed a lawsuit against Northwestern on behalf of Lacrosse Player.

"We are determined to end the cycle of institutional abuse. Northwestern can no longer hide from their public-facing elitism and secret coverups," Tamara Holder, an attorney representing the plaintiff, said in a statement to [Crain's](#).

Please call 312-440-9000 or email [intake@tamaraholder.com](mailto:intake@tamaraholder.com) if you have any information about Northwestern, the Athletic Department, Derrick Gragg, Homewood-Flossmoor High School, or any other issues related to sexual abuse in education.

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