

IN THE CIRCUIT COURT OF THE 19<sup>TH</sup> JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

[REDACTED],

Plaintiff,

vs.

MOUNT SINAI INSTITUTIONAL  
BAPTIST CHURCH and  
MICHAEL RUSSELL,

Defendants.

No: 21L 00000357

**NOTICE**

PURSUANT TO LCR - 2-2.14

THIS CASE IS HEREBY SET FOR AN INITIAL CASE MANAGEMENT CONFERENCE

IN COURTROOM C303 ON 8-17-21 AT 9:00 A.M./P.M.

FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR  
AN ORDER OF DEFAULT BEING ENTERED.

COMPLAINT AT LAW

COUNT I

NOW COMES the Plaintiff [REDACTED], by and through her attorneys,  
**DEUTSCHMAN & SKAFISH, P.C.**, and complaining of the Defendants, MOUNT  
SINAI INSTITUTIONAL BAPTIST CHURCH, a not for profit domestic corporation,  
and MICHAEL RUSSELL, states as follows:

1. That the Plaintiff, [REDACTED], is an individual residing in the  
County of Lake in the State of Illinois. Plaintiff was a minor at the time of the abuse  
alleged herein, and was a resident of the County of Cook in the State of Illinois. Almost  
all of the sexual acts took place in the City of North Chicago, County of Lake in the State  
of Illinois from 2009 to 2013.

2. That the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST  
CHURCH, at all times mentioned herein, was and still is a religious not for profit  
corporation doing business in the County of Lake in the State of Illinois.

3. That the defendant, MICHAEL RUSSELL, was a resident of the County  
of Lake in the State of Illinois at the time of the incident described more fully below. At

all times relevant hereto, MICHAEL RUSSELL was an employee, trustee and member of the defendant church and as such had autonomy to do what he wanted in the Church.

4. That the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH, was responsible for the staffing, supervision, managing and administration of various schools, parishes, and programs involving the church youth and all children taking part in activities run and established by the defendant church.

5. That at all times herein mentioned, the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH, was responsible for the health, safety and welfare of the children who attended the church programs and services within the church where the abusive members resided and worked.

6. That the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH, owed the minor Plaintiff a duty to provide a safe and wholesome environment within the church and to implement rules and procedures to protect children including the minor Plaintiff from sexual abuse.

7. That at the time when the minor plaintiff was just in 8<sup>th</sup> grade, defendant, MICHAEL RUSSELL, became friendly with the minor plaintiff and through his repeated grooming of the minor plaintiff developed a sexual relationship with the minor plaintiff wherein he would have sexual intercourse with the minor plaintiff from 2009 to 2013.

8. That when the sexual nature of the relationship between the defendant, RUSSELL, and the minor plaintiff became widely known in and around the Church, the defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH, did nothing to protect the minor plaintiff from the continuing and repeated sexual abuse at the hands of defendant, MICHAEL RUSSELL.

9. That during the time period in question, the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH employed defendant, MICHAEL RUSSELL, and as such, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH was responsible for RUSSELL's actions, behavior and conduct relating to the children attending the church programs and services.

10. That in 2009 when the minor plaintiff was first in 8<sup>th</sup> grade and continuing into 2013, defendant MICHAEL RUSSELL inappropriately sexually touched and had intercourse with the minor plaintiff. This conduct included but was not limited to the following: penetrating the minor Plaintiff's vagina with his penis.

11. That immediately subsequent to these occurrences with defendant, the minor Plaintiff was fearful to talk to anyone regarding these incidents since RUSSELL was in a position of authority and were viewed by the general public as holy men and by the church congregation therein as men of the cloth.

12. That as a result of the incidents described above, the minor Plaintiff's memory was repressed and Plaintiff was caused to sustain severe and irreparable psychological harm.

13. That at said time and place and prior thereto, the Defendant, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH, by its agents and/or employees and defendant, RUSSELL, were then and there negligent by committing one or more of the following acts or omissions:

a. Failed to properly supervise RUSSELL so that they were not alone with the children who attended the church;

b. Failed to institute protocols and procedures so that RUSSELL could not be alone with the children who attended the church including the minor Plaintiff herein;

c. Failed to protect the minor Plaintiff herein from sexual assault;

d. Failed to investigate the concerns or complaints of the minor plaintiff and other minors regarding RUSSELL;

e. Failed to stop the sexual abuse to the minor plaintiff when the allegations of abuse became known to the Church congregation widely; and

f. Failed to implement rules and regulations so that defendant RUSSELL or any other individual who was an agent and/or employee of the Defendant church, could not be allowed to touch any minor children.

14. As a direct result of the sexual abuse and exploitation of the minor Plaintiff and under the circumstances under which it occurred, caused the minor Plaintiff to develop various psychological coping mechanisms which reasonably made her incapable of ascertaining the resulting damages from that conduct.

15. That in approximately December 2019, Plaintiff became cognizant of her injuries that resulted from the sexual abuse that she had repressed, and connected them at that time with the emotional and mental issues she has stemming from such abuse.

16. As a direct result of the sexual exploitation, the Plaintiff has suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; was prevented and will continue to be prevented from performing her daily activities and obtaining the full enjoyment of life; has sustained loss of earnings and earning capacity; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

WHEREFORE, the Plaintiff, [REDACTED], respectfully requests that this Court enter a judgment against the Defendants, MOUNT SINAI INSTITUTIONAL

BAPTIST CHURCH and MICHAEL RUSSELL, in the amount in excess of Fifty  
Thousand Dollars (\$50,000.00), plus costs of suit.

**COUNT II**

NOW COMES the Plaintiff, [REDACTED], by and through her attorneys,  
DEUTSCHMAN & SKAFISH, P.C., and complaining of the Defendants, MOUNT  
SINAI INSTITUTIONAL BAPTIST CHURCH, a not for profit domestic corporation,  
and MICHAEL RUSSELL, states as follows:

1-14. Plaintiff re-alleges and incorporates paragraphs 1-14 of Count I as and for  
paragraphs 1-14 of Count II.

15. That at all times mentioned herein, Defendant church employed an  
administrator and/or other individual as a managerial agent or employee with the  
responsibility to oversee and supervise their employees and to devise rules and  
regulations for their employees to follow.

16. That at the time of and prior to the sexual assaults, the Defendant church,  
by and through said administrator, knew or should have known that without rules against  
unchaperoned activities with minor children, it could and would facilitate opportunities  
for illicit behavior, including sexual assault.

17. That at the time of and prior to the sexual assault, the Defendant church by  
and through said administrator, knew or should have known that the it did not implement  
any rules, regulations, protocols and procedures to protect the children within the church,  
including the minor Plaintiff herein, from the danger of sexual assault.

18. That at said time and place of the repeated years of sexual abuse, the Defendant church by said administrator or other individuals and the defendant RUSSELL, intentionally or with reckless disregard committed one or more of the following acts or omissions:

a. Failed to investigate and perform a background check of its agents and employees;

b. Permitted its employees to participate in unchaperoned activities, including with the minor Plaintiff herein, without having rules, regulations, protocols and procedures in place to keep the Defendant's employees from being alone with the minor children; and

c. Failed to remove, discharge, or transfer defendant RUSSELL from the church in question, when it knew or should have known that to keep him on staff and in and around the Church would not provide the young minor girls with a safe environment.

18. That the aforesaid willful and wanton acts or omissions were those of said administrator and/or any other individuals that were the managerial agents and servants acting within the scope of his/her agency or employment with Defendant at the time of the said acts or omissions.

19. As a direct result of the repeated sexual abuse and exploitation of the minor Plaintiff and the circumstances under which it occurred, caused Plaintiff to develop various psychological coping mechanisms which reasonably made her incapable of ascertaining the resulting damages from that conduct.

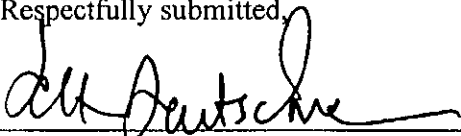
20. That in approximately December 2019, Plaintiff became cognizant of her injuries and the sexual abuse that she had repressed, and connected them at that time with the emotional and mental issues she has stemming from such abuse.

21. That one or more of the aforesaid willful and wanton acts or omissions of the Defendants were the proximate cause of the injuries to the Plaintiff.

22. That as a result of the Defendants' willful and wanton conduct, the minor Plaintiff, [REDACTED], suffered physical injury, pain and suffering and has suffered and continues to suffer emotional distress.

WHEREFORE, the Plaintiff, [REDACTED], respectfully requests that this Court enter a judgment against the Defendants, MOUNT SINAI INSTITUTIONAL BAPTIST CHURCH and MICHAEL RUSSELL, in the amount in excess of Fifty Thousand Dollars (\$50,000.00), plus costs of suit.

Respectfully submitted,

  
Attorney for Plaintiff

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