

FILED
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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL

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

DENYSE WANG STONEBACK,)	
)	COMPLAINT
Plaintiff,)	
)	
v.)	Case No.: 2023L062022
)	
KEVIN OLICKAL, FRIENDS OF)	
KEVIN OLICKAL, and,)	
GUN VIOLENCE PREVENTION PAC,)	DAMAGES OVER \$50,000
)	
Defendants.)	
)	JURY DEMAND

COMPLAINT

NOW COMES PLAINTIFF DENYSE WANG STONEBACK, by and through her counsel, Mudd Law Offices, and brings this action against DEFENDANTS KEVIN OLICKAL, FRIENDS OF KEVIN OLICKAL, and GUN VIOLENCE PREVENTION PAC (collectively “Defendants”) and, in support hereof, states as follows:

NATURE OF ACTION

1. This is an action for defamation *per se*, false light, and civil conspiracy arising from Defendants’ actions directed toward the Plaintiff.
2. By this action, the Plaintiff seeks compensatory damages, punitive damages, and all other relief to which she may be entitled as a matter of law.

PARTIES

3. Plaintiff Denyse Wang Stoneback (“Plaintiff” or “Ms. Stoneback”) is a citizen of the State of Illinois and a resident of Cook County.

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4. Defendant Gun Violence Prevention PAC (“GPAC”) is an Illinois political action committee with a place of business at 126 E. Wing Street, #205, Arlington Heights, Illinois 60004 in Cook County, Illinois.

5. Defendant Kevin Olickal (“Mr. Olickal”) is a citizen of the State of Illinois and a resident of Cook County.

6. Defendant Friends of Kevin Olickal (“FOKO”) is a candidate committee (committee ID: 35758) created on November 13, 2019 for the purpose of supporting the candidacy of Kevin Olickal for Illinois state representative of the 16th District. The FOKO committee has an address of PO Box 322, Skokie, Illinois 60077.

7. Defendant Kevin Olickal is the chair of the Defendant Friends of Kevin Olickal.

JURISDICTION AND VENUE

8. This Court may exercise general personal jurisdiction over Defendant GPAC because it operates in Illinois with a principal place of business in Cook County, State of Illinois.

9. This Court may exercise general personal jurisdiction over Defendant Kevin Olickal because he is a citizen of Cook County, State of Illinois.

10. This Court may exercise general personal jurisdiction over Defendant Friends of Kevin Olickal because it is a candidate committee registered in the State of Illinois with an address in Cook County, State of Illinois.

11. This Court may also exercise specific personal jurisdiction over the Defendants because they have directed conduct toward the Plaintiff in this county sufficient for this Court to exercise specific personal jurisdiction over them. Specifically, the Defendants published defamatory statements about the Plaintiff directed to residents of Cook County knowing Ms. Stoneback to reside in Cook County, Illinois.

12. Venue is proper in Cook County because all of the parties either reside or operate in Cook County. Further, a substantial part of the events or omissions giving rise to the claims occurred in Cook County. Additionally, the damages suffered and the harm felt by Ms. Stoneback as a result of the Defendants' defamatory statements occurred in Cook County.

13. The Defendants engaged in intentional conduct that has harmed Ms. Stoneback. The Defendants knew their statements to be false.

14. In the alternative, if one or more of the Defendants did not know the falsity of any particular statement, they acted with reckless disregard for the truth of the statement.

15. Ms. Stoneback has been injured by the Defendants' conduct and has suffered damages resulting therefrom.

FACTUAL BACKGROUND

16. The Defendants engaged in a concerted effort to destroy Ms. Stoneback's reputation among citizens of the State of Illinois and, particularly, the 16th District by knowingly publishing false statements that portrayed Ms. Stoneback as an enemy to gun violence prevention despite Ms. Stoneback having been a well-known advocate and voice for gun violence prevention throughout the State of Illinois for nearly a decade.

A Decade of Efforts to Reduce Gun Violence

The First Several Years

17. Ms. Stoneback holds a bachelor's degree in Criminology and Law Studies as well as a Masters in Translation.

18. In response to the December 14, 2012, Sandy Hook school shooting, Ms. Stoneback created People for a Safer Society.

19. People for a Safer Society ("PFSS") is a volunteer-led 501(c)(3) non-profit

organization to facilitate education, awareness, and advocacy.

20. PFSS encourages grassroots community members to meet with their local, state, and federal elected officials to educate their officials on the issue of gun violence and encourage them to support gun violence prevention.

21. Through PFSS, Ms. Stoneback organized and led in-person meetings with multiple state representatives and state senators over several years.

22. During this time, Ms. Stoneback led and/or participated in trips to Springfield, Illinois and other Illinois cities to rally, protest, hold vigils for victims of gun violence, and provide public comment at local meetings.

23. In January 2013, Ms. Stoneback founded an alliance group of advocates and organizations to work together on gun violence prevention efforts and for common sense gun legislation (“The Alliance”).

24. The Alliance later merged with the Illinois Council Against Handgun Violence and formed the Illinois Gun Violence Prevention Coalition (“ILGVP”), a statewide coalition that reached over 250 member organizations in 2018.

25. In February 2013, Ms. Stoneback drafted and circulated a petition seeking people to express support for common-sense measures to foster a safer society. These measures included adopting universal background checks for all firearms and ammunition sales/exchanges or gifts; banning military-style assault weapons and high-capacity magazines from civilian use; and, improving access to mental health services through funding and improved legislation.

26. When the Illinois House passed Senate Bill 2193 in May of 2013, backed by then-House Speaker Michael Madigan, to allow concealed carry within the state of Illinois, Ms.

Stoneback, together with other advocates and organizations, protested outside Madigan's Chicago office against Senate Bill 2193.

27. On May 31, 2013, the Illinois General Assembly passed the concealed carry legislation House Bill 183.

28. In June 2013, Ms. Stoneback and others met with then-Governor Pat Quinn to urge him to amendatory veto House Bill 183.

29. As a result, on July 2, 2013, former Governor Pat Quinn took amendatory veto action on House Bill 183.

30. However, Illinois legislators later overrode Governor Quinn's amendatory veto.

31. Throughout the summer of 2013, Ms. Stoneback organized citizen comments at municipal board meetings to urge passage of assault weapons bans in multiple Illinois municipalities, including Skokie and Evanston.

32. During this time, she also helped lead and develop legislative strategies for the United Power for Action and Justice legislative *ad hoc* committee on gun violence prevention.

33. In January 2014, Ms. Stoneback founded the St. Nick's Gun Violence Prevention Team at St. Nicholas Church of Evanston.

34. On June 11, 2014, Ms. Stoneback spoke at *Unloading Your 401K and Socially Responsible Investing*, where she discussed retirement investments held in gun manufacturers and how individual investors can learn about and divest from these investments to support common sense gun policies.

35. Later that Summer, Ms. Stoneback and PFSS raised awareness among officials, schools, businesses, and religious institutions in Skokie, Illinois about neighboring Niles, Illinois granting a special use permit for the largest gun shop and firing range ("Niles Gun Shop") in the

Midwest. The efforts of Ms. Stoneback and PFSS played an integral role in building opposition to the Niles Gun Shop.

36. Additionally, PFSS and Ms. Stoneback led a lawsuit against the Village of Niles and the Niles Gun Shop to prevent the Niles Gun Shop from opening near schools, churches, and children's recreational facilities.

37. In 2015, PFSS and Ms. Stoneback joined others to protest outside a Riverdale, Illinois gun shop because it served as a source of guns used in crimes within Chicago, Illinois.

38. In the Fall of 2015, Ms. Stoneback gave a presentation at the Firearms Committee meeting of the International Association of Chiefs of Police annual conference in Chicago, Illinois during which she presented findings of the City of Chicago's report on "Tracing the Guns" and discussed keeping guns out of the illegal market through regulating firearms dealers.

39. From 2015 to 2018, PFSS and Ms. Stoneback worked on strategy, education, and advocacy efforts for statewide gun dealer licensing in Illinois.

40. In October 2016, Ms. Stoneback and PFSS brought screenings of the documentary film *Under the Gun* to two different theaters in Chicago.

41. *Under the Gun*, directed by non-party Stephanie Soechtig and executive produced by non-party journalist and media personality Katie Couric, offers an in-depth view of gun violence issues and how people can be part of the solution.

42. In Spring 2017, Ms. Stoneback, through PFSS and the ILGVP Coalition, helped lead the fight to stop a bill (SB 50/HB2481) to legalize gun silencers throughout Illinois that would have jeopardized public safety in Illinois communities.

43. The Silencer Bill did not pass.

44. In 2017, Ms. Stoneback supported and accompanied a victim of gun violence to Springfield, Illinois to testify as a witness in support of Illinois House Bill 2354, the Lethal Violence Order of Protection, a red flag law to empower family members to petition the courts to remove firearms for a limited period of time from person(s) who they believe may hurt themselves or others.

45. In 2018, Ms. Stoneback served on the board of the National Gun Victims Action Council (“NGVAC”).

46. In February 2018, representing PFSS and the NGVAC, Ms. Stoneback called for residents to demand that Illinois lawmakers adopt a gun dealer licensing bill and urged support for a proposed Lethal Violence Order of Protection Act.

47. In March 2018, Ms. Stoneback and her family traveled to Washington D.C. to attend the March for Our Lives Rally, a response to the Marjory Stoneman Douglas High School shooting in Parkland, Florida.

48. From June 2018 through September 2018, Ms. Stoneback worked as an independent contractor for the NGVAC and provided project management consulting, reviewed a book for publication, and provided support for a national campaign.

49. On November 23, 2019, Ms. Stoneback attended and spoke at a press conference to advocate against the arming of teachers outside the Illinois Association of School Boards conference in Chicago, Illinois.

50. Prior to her nomination as State Representative of the 16th District (“16th District State Rep.”), Ms. Stoneback founded the National Extreme Risk Protection Order (“ERPO”) Working Group to bring together people implementing ERPO laws in states across the country to share strategies, ideas, and methods on effective ways to educate communities about ERPO.

51. Through her substantial efforts over nearly ten years, Ms. Stoneback had developed a reputation as a strong advocate for gun violence prevention.

2020 Primary Election for the 16th District State Representative

52. In early 2019, multiple community members encouraged Ms. Stoneback to run for state representative and replace non-party former Representative Yehiel Mark Kalish due to his poor record on gun violence prevention and women's rights.

53. Combined with the encouragement of others and a local tragedy related to gun violence, Ms. Stoneback decided to run for state representative.

54. Consequently, in August 2019, Ms. Stoneback stepped down from the Board of PFSS and announced her run for 16th District State Rep.

55. Ms. Stoneback focused her campaign on two key issues: (1) women's rights and (2) gun violence prevention.

56. During Ms. Stoneback's 2020 campaign for 16th District State Rep., Defendant GPAC endorsed Ms. Stoneback.

57. In fact, Defendant GPAC described and listed Ms. Stoneback's experience and background in advocating for gun violence prevention in one of its 2020 Voter Guides by stating:

Following the Sandy Hook School shooting in 2012, Denyse founded People for a Safer Society, an Illinois nonprofit organization to fight gun violence. She helped pass landmark gun safety legislation, and was instrumental in stopping the opening of a gun shop and range on Howard Street in Niles, near Niles West High School.¹

¹ See GPAC Gun Violence Prevention PAC, *2020 Voter Guide*, <http://web.archive.org/web/20201021183206/https://gpacillinois.com/2020-voter-guide/> (last visited April 18, 2023).

58. Clearly, Defendant GPAC based its endorsement of Ms. Stoneback based upon its knowledge of her positions, record, and reputation in advocating for gun violence prevention throughout the State of Illinois.

59. In March 2020, Ms. Stoneback won the primary election with a wide margin over both her opponents, non-party Yehiel Mark Kalish and Defendant Kevin Olickal.

60. Following her primary election, Ms. Stoneback spoke at Defendant GPAC's Digital Day of Action in support of the BIO Bill, a bill that would require *mandatory* fingerprinting for all FOID card holders.

61. Ms. Stoneback subsequently won the general election.

State Representative of the 16th District

62. In January 2021, Ms. Stoneback was sworn in as the State Representative for Illinois' 16th District.

63. Soon thereafter, Ms. Stoneback co-founded the Gun Violence Prevention Caucus in the Illinois House of Representatives.

64. As a State Representative, Ms. Stoneback made reducing gun violence in Illinois her top legislative priority.

65. During her first year as State Representative, Ms. Stoneback helped pass major gun safety legislation to strengthen Illinois' Firearms Restraining Order (i.e. House Bill 1092).

66. In doing so, Ms. Stoneback utilized and relied on evidence-based recommendations from the Johns Hopkins Center for Gun Policy and Research ("JHCGPR"), which has a national reputation for high-quality research, analysis, and innovation to advance the prevention of gun violence, in its 2019 report, "Policies to Reduce Gun Violence in Illinois."

67. Throughout Ms. Stoneback’s term as 16th District State Rep., Ms. Stoneback continued to use these recommendations as a guide in drafting evidence-based gun safety legislation to improve gun safety in Illinois.

68. She co-sponsored legislation that provided stricter means for individuals to buy guns within the State of Illinois.

69. During this time, Defendant GPAC knew and appreciated Ms. Stoneback’s record on gun safety legislation.

70. In fact, Defendant GPAC sought her sponsorship on gun safety legislation.

71. Additionally, Defendant GPAC and Ms. Stoneback worked closely together.

72. In early 2021, the Illinois House of Representatives introduced House Bill 1091, also known as the “Fix the FOID” or “BIO” bill, that would make fingerprinting mandatory.

73. Ms. Stoneback had been pushing for legislation that would make fingerprinting a mandatory requirement when applying for or renewing a Firearm Owner’s Identification (“FOID”) card.

74. Consequently, following the introduction of House Bill 1091, Ms. Stoneback became a chief co-sponsor of House Bill 1091.

75. House Bill 1091 was also a priority bill for Defendant GPAC.

76. In fact, Defendant GPAC had also been advocating for mandatory fingerprinting for all Illinois gun owners for years.

77. Defendant GPAC and Ms. Stoneback worked together to support House Bill 1091 and mandatory fingerprinting.

78. In response to some of the work Ms. Stoneback completed in advocating for House Bill 1091, the President of Defendant GPAC texted Ms. Stoneback “Yaaaaaas!!!!!!,” “Love it!” and “You are working it Girl! Love it.”

79. Defendant GPAC encouraged Ms. Stoneback to work on securing passage of House Bill 1091.

80. On May 29, 2021, House Bill 1091 passed the Illinois House of Representatives.

81. In response, Defendant GPAC sent an email to its supporters with the subject line stating, “VICTORY: The BIO Bill has Passed the Illinois House” and explaining that “[w]e are writing to you with some great news: the Block Illegal Ownership (BIO) and FIX the FOID Bill (HB1091) has officially passed in the Illinois House.”

82. As a further example of her work with gun safety legislation, Ms. Stoneback authored and introduced House Bill 1092 which, upon becoming law, strengthened and expanded Illinois’ firearms restraining order law.

83. Ms. Stoneback consistently advocated and pushed for stronger gun laws.

84. During her term, Ms. Stoneback introduced, sponsored, or co-sponsored at least 13 bills in the 102nd General Assembly to reduce gun violence and/or help victims of gun violence.

85. In her entire tenure as 16th District State Rep., Ms. Stoneback never voted against any gun safety bills.

Competing Bills

86. As stated above, Ms. Stoneback supported House Bill 1091 because it made fingerprinting mandatory to obtain or renew FOID cards.

87. She believed this to be very important based on numerous expert recommendations.

88. She also cited Connecticut's 40% reduction in the firearm-related homicide rate following introduction of in-person background checks at a law enforcement agency and mandatory fingerprinting.

89. At the same time, a competing piece of legislation, House Bill 0562, included a *voluntary* fingerprinting provision instead of a *mandatory* fingerprinting provision to obtain or renew FOID cards.

90. Ms. Stoneback believed that voluntary fingerprinting would be meaningless.

91. Experts in gun violence prevention policy and research agreed with Ms. Stoneback.

92. On June 11, 2021, at a gun violence prevention advocacy coalition meeting, Ms. Stoneback and others, including representatives of Defendant GPAC, discussed House Bill 0562 in comparison to House Bill 1091.

93. At the meeting, Ms. Stoneback explained how voluntary fingerprinting will not work.

94. She referred to JHCGPR's top recommendations for Illinois which included mandatory fingerprinting and in-person background checks for FOID applications.

95. As House Bill 0562 did not include these provisions, Ms. Stoneback believed House Bill 1091 to be the stronger and more favorable legislation. And House Bill 1091 had already passed the Illinois House of Representatives.

96. At some point, Defendant GPAC changed its position and decided to accept voluntary fingerprinting.

97. In an effort to explain this shift in position, the President of GPAC stated that she “wanted mandatory fingerprint . . . I mean, GPAC led the effort for over three years to get a mandatory fingerprint.”

98. However, the President of GPAC stated that “[s]ome fingerprint is better than no fingerprint.”

99. This concession resulted in a compromise with opponents of the legislation including the Illinois State Rifle Association (“ISRA”).

100. At the time of the compromise, it remained to be seen whether those who had been advocating for mandatory fingerprinting would vote for a weakened piece of legislation.

101. Ms. Stoneback advocated for the stronger bill, House Bill 1091, and expressed her disappointment that Defendant GPAC and other advocates did not stand firm for the stronger bill.

102. Due to House Bill 0562’s weaker provisions regarding fingerprinting, Ms. Stoneback chose to abstain from voting on House Bill 0562.

103. During the House Judiciary Committee Hearing on June 16, 2021, Ms. Stoneback stated that she had been involved in gun violence prevention advocacy for quite some time. She further expressed her disappointment that House Bill 0562 lacked provisions of evidence-based research, the top recommendations for mandatory fingerprinting, in-person application at law enforcement agencies, and a shorter duration for FOID card renewal. For these reasons, she explained that she would be abstaining from voting on that bill and that she looked forward to continuing to work on these issues.

104. In the end, House Bill 0562 passed the Illinois House of Representatives and the Illinois Senate.

105. On June 17, 2021, in response to the passing of House Bill 0562, the ISRA published an article on its website explaining why, in its position, House Bill 1091 and Ms. Stoneback “had to be stopped,” and how “HB 562 stopped HB 1091.”

106. Clearly, the ISRA saw Ms. Stoneback as a proponent of strong gun safety legislation.

107. In August 2021, Governor JB Pritzker signed into law House Bill 0562.

108. Undaunted, on January 28, 2022, Ms. Stoneback introduced House Bill 5535 that required mandatory fingerprinting for gun sales.

Knowledge of Defendant GPAC

109. During the 2020 election cycle, Defendant GPAC endorsed and supported Ms. Stoneback.

110. In one of their 2020 Voter Guides, Defendant GPAC acknowledged her history of gun violence prevention advocacy.

111. In April 2021, Ms. Stoneback met with Defendant GPAC, its President, and another of its representatives on separate occasions to discuss gun violence prevention initiatives.

112. With respect to House Bill 1092, Defendant GPAC sent a May 12, 2021 email to the ILGVP Coalition stating that it was “very excited to watch Rep. Stoneback present her bill and *fingers crossed,* see the bill get the 60 votes needed to pass!”

113. Further, in the May 12, 2021, Defendant GPAC told the ILGVP Coalition to thank “Rep. Stoneback for her fearless work to expand this life-saving law” once the bill passes.

114. On May 29, 2021, Defendant GPAC sent an email to GPAC members regarding House Bill 1091 specifically thanking Ms. Stoneback as a sponsor of House Bill 1091 and for championing the bill.

115. Defendant GPAC conveyed its support of Ms. Stoneback and her efforts to improve gun safety.

116. In fact, Defendant GPAC and Ms. Stoneback maintained a good working relationship during this time advocating for stronger gun violence prevention laws.

117. In November 2021, Defendant GPAC released their “2021 Gun Safety Report Card” grading each legislator’s voting history on six different gun safety bills.

118. Defendant GPAC’s 2021 Gun Safety Report Card reflected that Ms. Stoneback had voted “yes” on five of the six bills they supported and abstained from voting on one bill.

119. Ms. Stoneback had abstained from voting on House Bill 0562 in favor of the stronger House Bill 1091.

120. Clearly, Defendant GPAC knew Ms. Stoneback’s voting history and strong position on gun violence prevention and gun safety legislation.

Knowledge of Defendants Kevin Olickal and Friends of Kevin Olickal

121. Defendants Kevin Olickal and subsequently Friends of Kevin Olickal have been involved in Illinois politics prior to the 2022 primary election.

122. Defendant Mr. Olickal previously worked for various state representatives as a field coordinator and as a legislative community outreach coordinator, respectively.

123. Additionally, Defendant Mr. Olickal previously worked as a campaign manager for a school board member.

124. Further, Defendant Mr. Olickal ran against Ms. Stoneback in the 2020 primary election and additionally, ran against her in the 2022 primary election.

125. Specifically, during the 2022 primary election, Defendant Mr. Olickal made public comments about Ms. Stoneback’s legislative history.

126. Defendants Mr. Olickal and Friends of Kevin Olickal campaigned against Ms. Stoneback in back-to-back primary elections.

127. Defendants Mr. Olickal and Friends of Kevin Olickal have been involved in Illinois politics for multiple years and by the aforementioned decade long advocacy, know Ms. Stoneback's stance on gun violence prevention.

2022 Primary Election for State Representative of the 16th District

128. In 2022, Ms. Stoneback came up for re-election.

129. In June 2022, the 16th District State Rep. primary election ballot included Ms. Stoneback and Defendant Kevin Olickal.

130. Defendant GPAC endorsed and supported Defendant Mr. Olickal throughout the 2022 primary election.

131. Toward the end of the primary election, the Defendants conspired to use Ms. Stoneback's continued advocacy for mandatory fingerprinting – a law that Defendant GPAC had sought for years - against her.

132. Indeed, the Defendants engaged in a campaign that completely deconstructed Ms. Stoneback's history of gun safety advocacy and knowingly recast her as an *opponent* of gun safety legislation.

133. In fact, they engaged in a relentless bombardment of false statements about Ms. Stoneback that sought to and succeeded in destroying the reputation she built over nearly ten years of advocacy for gun safety and preventing gun violence.

FOKO First Mailer Flyer

134. Defendant FOKO, created and published a mailer flyer that included an excerpt quoting statements from Kathleen Sances, President and Chief Executive Officer of Defendant

GPAC (“FOKO First Mailer Flyer”).

135. Specifically, the FOKO First Mailer Flyer stated that “... [Ms. Stoneback] turned her back on the people that elected her by not supporting life-saving universal background checks, fingerprinting for gun license applications, and mental health and trauma support funding for survivors.”

136. The FOKO First Mailer Flyer also stated that “Rep. Wang Stoneback failed to keep our children, families, and communities safe from illegal guns that have led to an increase in violence.”



(FOKO First Mailer Flyer Side 1)

137. These statements are false.

138. Ms. Stoneback did not turn her back on the people who elected her or anyone for that matter.

139. Ms. Stoneback did, in fact, support life-saving universal background checks, *mandatory* fingerprinting for gun license applications, and mental health and trauma support funding for survivors.

140. Ms. Stoneback did not fail to keep children, families, and communities safe from illegal guns.

141. In fact, she fought for stronger legislation.

142. Defendants knew this.

143. Indeed, on June 4, 2021, the founder of GPAC, Tom Vanden Berk (“Mr. Vanden Berk”), stated that Ms. Stoneback had been terrific in pushing for the stronger bill (House Bill 1091).

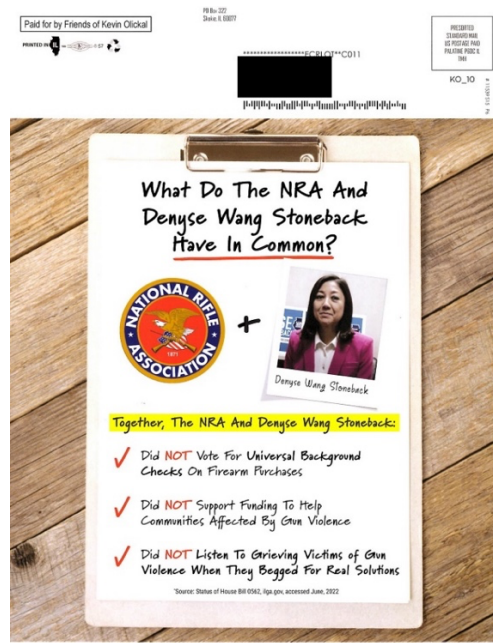
FOKO Second Mailer Flyer

144. In June 2022, Defendant FOKO created and published another mailer flyer that falsely stated “Denyse Wang Stoneback Chose to Stand with the NRA” (“FOKO Second Mailer Flyer”).

145. In addition, the FOKO Second Mailer Flyer emphasized this false statement by including a photograph of Ms. Stoneback next to a photograph of the National Rifle Association (“NRA”) logo.



(FOKO Second Mailer Flyer Side 1)



(FOKO Second Mailer Flyer Side 2)

146. Additionally, the FOKO Second Mailer Flyer stated that, “[w]hile Mass Shootings Terrorized Ou[r] Country, Denyse Wang Stoneback Stood With the NRA And Ignored Victims of Gun Violence.”

147. Further, the FOKO Second Mailer Flyer included the statements: “What Do The NRA And Denyse Wang Stoneback Have In Common?” and “Together, The NRA And Denyse Wang Stoneback: ... Did NOT Support Funding To Help Communities Affected By Gun Violence; Did NOT Listen to Grieving Victims of Gun Violence When They Begged For Real Solutions.”

148. Clearly, through the FOKO Second Mailer Flyer and its statements, Defendant FOKO meant to convey that Ms. Stoneback works with the NRA or, at the minimum, shares the same views on gun safety legislation and gun ownership as the NRA.

149. These statements are false.

150. Ms. Stoneback did not and does not stand with the NRA. She does not share the same views as the NRA on gun safety legislation and gun ownership.

151. Ms. Stoneback did not work with the NRA.

152. Ms. Stoneback did not ignore victims of gun violence.

153. Ms. Stoneback supports funding to help communities affected by gun violence.

154. Ms. Stoneback listens to grieving victims of gun violence.

155. Ms. Stoneback supports gun safety measures and gun safety legislation.

156. Ms. Stoneback's history of advocacy demonstrates the false nature of the Defendant FOKO's statements.

157. The Defendants knew this.

FOKO Third Mailer Flyer

158. In June 2022, Defendant FOKO created and published another mailer flyer that included false statements ("FOKO Third Mailer Flyer").

159. The FOKO Third Mailer Flyer stated that “[a]fter countless mass shootings, State Rep. Denyse Wang Stoneback SAID NO to requiring background checks on gun purchases.”



(FOKO Third Mailer Flyer Side 1)

160. This statement is false.

161. Combined, the photo and statement falsely convey a meaning that Ms. Stoneback voted against background checks on gun purchases.

162. Ms. Stoneback did not say “no” to requiring background checks on gun purchases.

163. In fact, Ms. Stoneback supported then and continues to support life-saving universal background checks, *mandatory* fingerprinting for gun license applications, and mental health and trauma support funding for survivors.

164. In fact, she has fought for stronger legislation.

165. The Defendants knew this.

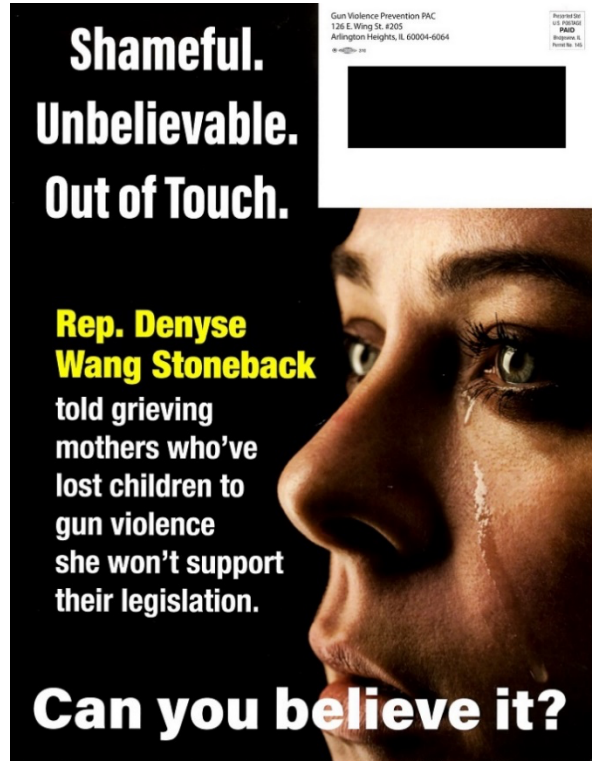
First GPAC Mailer Flyer

166. Defendant GPAC created and published a mailer flyer that contained false statements about Ms. Stoneback (“First GPAC Mailer Flyer”).

167. The First GPAC Mailer Flyer included a photograph of Plaintiff Ms. Stoneback with a picture of a gun and a document titled “Firearms Transaction Record.”



(GPAC First Mailer Flyer Side 1)



(GPAC First Mailer Flyer Side 2)

168. The First GPAC Mailer Flyer included a photograph of Ms. Stoneback and the statement “No to background checks on gun purchases!”

169. The First GPAC Mailer Flyer stated that “[w]hen asked by grieving mothers to support legislation to keep our children, families, and communities safe... Stoneback said No!”

170. Additionally, the First GPAC Mailer Flyer stated that “[o]nly a politician like Denyse Wang Stoneback would tell grieving mothers she knew best.”

171. Finally, the First GPAC Mailer Flyer stated that “Rep. Denyse Wang Stoneback told grieving mothers who’ve lost children to gun violence she won’t support their legislation.”

172. These statements are false.

173. Combined, the photo and statements falsely convey a meaning that Ms. Stoneback voted against background checks on gun purchases.

174. Ms. Stoneback did not say “no” to requiring background checks for gun purchases.

175. In fact, Ms. Stoneback supported then and continues to support life-saving background checks.

176. Ms. Stoneback never told grieving mothers who lost children to gun violence “No” to their legislation or that she “knew best.”

177. In fact, Ms. Stoneback has never voted against gun safety legislation.

178. Defendants knew this.

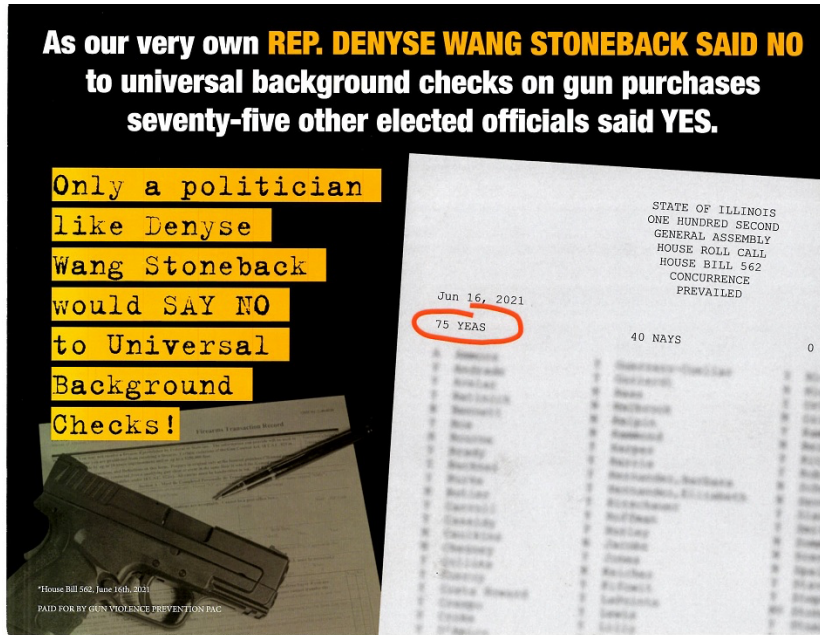
Second GPAC Mailer Flyer

179. Defendant GPAC created and published an additional mailer flyer that contained false statements about Ms. Stoneback (“Second GPAC Mailer Flyer”).

180. The Second GPAC Mailer Flyer included a photograph of a gun; a document titled “Firearms Transaction Record” in the background; and, a document titled “STATE OF ILLINOIS ONE HUNDRED SECOND GENERAL ASSEMBLY HOUSE ROLL CALL HOUSE BILL 562 CONCURRENCE PREVAILED” in the foreground.

181. In conjunction with these images, the Second GPAC Mailer Flyer stated that “[a]s our very own REP. DENYSE WANG STONEBACK SAID NO to universal background checks on gun purchases seventy-five other elected officials said YES.”

182. The Second GPAC Mailer Flyer further stated: “Only a politician like Denyse Wang Stoneback would SAY NO to Universal Background Checks!”



(Second GPAC Mailer Flyer Side 1)



(Second GPAC Mailer Flyer Side 2)

183. These statements are false.

184. Combined, the photo and statement falsely convey a meaning that Ms. Stoneback voted against background checks on gun purchases.

185. Ms. Stoneback did not say “no” to requiring background checks.

186. In fact, she supported then and continues to support life-saving universal background checks.

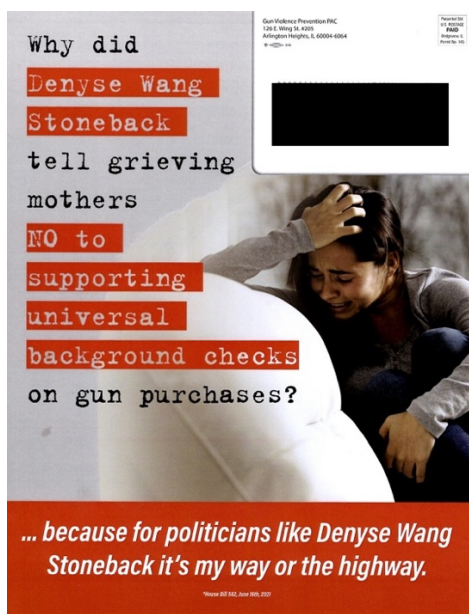
187. Additionally, Ms. Stoneback has never voted “No” or against any gun safety legislation.

188. The Defendants knew this.

Third GPAC Mailer Flyer

189. The Defendant GPAC created and published a third mailer flyer that contained false statements about Ms. Stoneback (“Third GPAC Mailer Flyer”).

190. The Third GPAC Mailer Flyer stated: “Why did Denyse Wang Stoneback tell grieving mothers NO to supporting universal background checks on gun purchases? ... because for politicians like Denyse Wang Stoneback it’s my way or the highway.”



(Third GPAC Mailer Flyer Side 1)

191. These statements are false.

192. Combined, the photo and statement falsely convey a meaning that Ms. Stoneback voted against and did not support background checks on gun purchases.

193. Ms. Stoneback did not say “no” to requiring background checks.

194. In fact, she supported then and continues to support life-saving universal background checks.

195. Additionally, Ms. Stoneback has never voted “No” or against any gun safety legislation.

196. The Defendants knew this.

Public Perception

197. Ms. Stoneback’s constituents in the 16th District favor gun safety legislation.

198. The Defendants knew that her constituents in the 16th District favor gun safety legislation.

199. The Defendants published the foregoing statements that falsely stated Ms. Stoneback opposes gun safety legislation.

200. The Defendants published the foregoing statements that falsely stated Ms. Stoneback engaged in conduct harmful to her constituents and the general public.

201. The foregoing statements shall be referred to collectively as the Defendants’ False Statements.

202. The Defendants knew Ms. Stoneback’s record on gun safety legislation.

203. The Defendants knew their Defendants’ False Statements did not accurately reflect Ms. Stoneback’s record on gun safety legislation.

204. The Defendants knew their Defendants' False Statements falsely reflected Ms. Stoneback's record on gun safety legislation.

205. The Defendants intended that the public consider their Defendants' False Statements about Ms. Stoneback as fact.

206. The Defendants sought to persuade Ms. Stoneback's constituents in the 16th District that she opposes gun safety legislation.

207. The Defendants sought to persuade Ms. Stoneback's constituents in the 16th District that she engaged in conduct harmful to them.

208. Additionally, the Defendants sought to destroy Ms. Stoneback's reputation as a gun safety advocate.

209. The Defendants' False Statements about Ms. Stoneback caused many of her constituents to falsely believe that Ms. Stoneback opposed gun safety legislation.

210. The Defendants' False Statements about Ms. Stoneback caused many of her constituents to vote against her (or not vote at all) based upon the belief that Ms. Stoneback opposed gun safety legislation.

211. The Defendants' False Statements about Ms. Stoneback caused many of her constituents to not vote at all.

212. As a result of the Defendants' False Statements, Ms. Stoneback lost the primary election in June 2022.

COUNT ONE
AS AND FOR A FIRST CAUSE OF ACTION
DEFAMATION PER SE
(Against Defendants Kevin Olickal and FOKO)

213. The Plaintiff hereby incorporates by reference Paragraphs 1 through 212 above as though fully set forth herein.

214. Defendants Kevin Olickal and FOKO published the FOKO First Mailer Flyer that falsely stated “[Ms. Stoneback] turned her back on the people that elected her by not supporting life-saving universal background checks, fingerprinting for gun license applications, and mental health and trauma support funding for survivors.”

215. The FOKO First Mailer Flyer also falsely stated that “Rep. Wang Stoneback failed to keep our children, families, and communities safe from illegal guns that have led to an increase in violence.”

216. Defendants Kevin Olickal and FOKO knew their statements in the FOKO First Mailer Flyer to be false.

217. Ms. Stoneback did not turn her back on her constituents.

218. Ms. Stoneback supported then and continues to support life-saving universal background checks, fingerprinting for gun license applications, and mental health and trauma support funding for survivors.

219. Ms. Stoneback did not fail to keep children, families, and communities safe from illegal guns.

220. Ms. Stoneback has advocated for more than ten years for gun violence prevention.

221. In fact, Ms. Stoneback has never voted against any gun violence prevention legislation.

222. Defendants Kevin Olickal and FOKO knew Ms. Stoneback’s background and advocacy work.

223. Defendants Kevin Olickal and FOKO knew their statements to be false.

224. In June 2022, Defendants Kevin Olickal and FOKO published the FOKO Second Mailer Flyer that falsely stated “Denyse Wang Stoneback Chose to Stand with the NRA.”

225. Additionally, the FOKO Second Mailer Flyer falsely stated that “[w]hile Mass Shootings Terrorized Ou[r] Country, Denyse Wang Stoneback Stood With the NRA And Ignored Victims of Gun Violence.”

226. Further, the FOKO Second Mailer Flyer included the false statements: “What Do The NRA And Denyse Wang Stoneback Have In Common?” and “Together, The NRA And Denyse Wang Stoneback: ... Did NOT Support Funding To Help Communities Affected By Gun Violence; Did NOT Listen to Grieving Victims of Gun Violence When They Begged For Real Solutions.”

227. Defendants Kevin Olickal and FOKO knew their statements in the FOKO Second Mailer Flyer to be false.

228. Ms. Stoneback has never stood with the NRA. Ms. Stoneback did not and does not stand with the NRA. She does not share the same views as the NRA on gun safety legislation and gun ownership.

229. Ms. Stoneback has never collaborated, partnered, or worked with the NRA.

230. Ms. Stoneback has not ignored victims of gun violence.

231. Ms. Stoneback supported and continues to support funding to help communities affected by gun violence.

232. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

233. Defendants Kevin Olickal and FOKO knew Ms. Stoneback's background and advocacy work.

234. Defendants Kevin Olickal and FOKO knew their statements to be false.

235. Further, in June 2022, Defendant FOKO published the FOKO Third Mailer Flyer that falsely stated Ms. Stoneback "SAID NO to requiring background checks on gun purchases."

236. Ms. Stoneback did not say no to requiring background checks on gun purchases.

237. In fact, Ms. Stoneback never voted "No" on any gun violence prevention legislation.

238. And, Ms. Stoneback advocated for and co-sponsored legislation that would require background checks with *mandatory* fingerprinting on gun purchases.

239. Defendants Kevin Olickal and FOKO made the foregoing statements on and through mailer flyers ("FOKO Flyer Statements").

240. The FOKO Flyer Statements refer directly to Ms. Stoneback by name.

241. Persons other than Ms. Stoneback, on the one hand, and Defendants Kevin Olickal and FOKO, on the other hand, would have and actually have reasonably understood that the FOKO Flyer Statements related to and were about Ms. Stoneback.

242. Defendants Kevin Olickal and FOKO presented the FOKO Flyer Statements as statements of fact.

243. Defendants Kevin Olickal and FOKO wanted the recipients of the FOKO Flyer Statements to believe the statements to be a true and accurate representation of Ms. Stoneback's views on background checks and gun violence prevention.

244. The FOKO Flyer Statements constitute an unprivileged publication by Defendants Kevin Olickal and FOKO of false statements about Ms. Stoneback to third parties.

245. Defendants Kevin Olickal and FOKO made the FOKO Flyer Statements with actual malice knowing the falsity of the statements.

246. Where Defendants Kevin Olickal and FOKO did not know the falsity of any particular statement, they acted with reckless disregard for the truth.

247. As a result of the foregoing conduct of Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback has suffered and continues to suffer damages including, but not limited to, harmed reputation, harmed standing in the community, and, loss of income.

248. In addition to the foregoing, Ms. Stoneback has suffered economic harm in the form of lost income as a state representative and the monies expended on her campaign.

249. As a result of the foregoing conduct of Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback's reputation as an individual advocating for gun violence prevention has been significantly harmed.

250. As a result of the foregoing conduct of Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback's chances of success in future endeavors, particularly, relating to gun violence prevention work, have been negatively impacted.

251. The FOKO Flyer Statements imputed an inability to perform her duties.

252. The FOKO Flyer Statements imputed a lack of integrity as an advocate for gun violence prevention.

253. The FOKO Flyer Statements prejudiced Ms. Stoneback in her profession as a state representative and advocate for gun violation prevention.

254. Based on the foregoing, the FOKO Flyer Statements constitute defamation *per se*.

255. The foregoing conduct constitutes defamation *per se*.

256. WHEREFORE, Ms. Stoneback seeks an award of compensatory and punitive damages arising from the Defendants' Kevin Olickal and FOKO *per se* defamation of her.

COUNT TWO

AS AND FOR A SECOND CAUSE OF ACTION

DEFAMATION *PER SE*

(Against Defendant GPAC)

257. The Plaintiff hereby incorporates by reference Paragraphs 1 through 212 above as though fully set forth herein.

258. Defendant GPAC published the First GPAC Mailer Flyer that falsely stated “[w]hen asked by grieving mothers to support legislation to keep our children, families, and communities safe... Stoneback said No!”

259. The First GPAC mailer also falsely stated that “[o]nly a politician like Denyse Wang Stoneback would tell grieving mothers she knew best” and “Rep. Denyse Wang Stoneback told grieving mothers who’ve lost children to gun violence she won’t support their legislation.”

260. Defendant GPAC knew its statements in the First GPAC Mailer Flyer to be false.

261. Ms. Stoneback did not tell grieving mothers she “knew best.”

262. Ms. Stoneback did not tell grieving mothers who lost children to gun violence that she would not support “their legislation.”

263. Ms. Stoneback has consistently supported legislation to keep children, families, and communities safe from gun violence.

264. Ms. Stoneback has never voted “No” on legislation seeking to prevent gun violence.

265. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

266. Ms. Stoneback fought and continues to fight for stronger gun violence prevention and gun safety legislation.

267. Defendant GPAC also published the Second GPAC Mailer Flyer that falsely stated “[a]s our very own REP. DENYSE WANG STONEBACK SAID NO to universal background checks on gun purchases seventy-five other elected officials said YES.”

268. The Second GPAC Mailer Flyer also falsely stated “Only a politician like Denyse Wang Stoneback would SAY NO to Universal Background Checks!”

269. Defendant GPAC knew its statements in the Second GPAC Mailer Flyer to be false.

270. Ms. Stoneback did not say “no” to universal background checks on gun purchases.

271. In fact, Ms. Stoneback never voted “No” on any gun violence prevention legislation.

272. And, Ms. Stoneback advocated for and co-sponsored legislation that would require background checks with *mandatory* fingerprinting on gun purchases.

273. Defendant GPAC published the Third GPAC Mailer Flyer that falsely stated “Why did Denyse Wang Stoneback tell grieving mothers NO to supporting universal background checks on gun purchases? ... because for politicians like Denyse Wang Stoneback it’s my way or the highway.”

274. Again, Ms. Stoneback did not tell grieving mothers “no” to supporting universal background checks on gun purchases.

275. In fact, Ms. Stoneback never voted “No” on any gun violence prevention legislation.

276. Ms. Stoneback has advocated for more than ten years for gun violence prevention.

277. Ms. Stoneback has not ignored victims of gun violence.

278. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

279. Defendant GPAC knew Ms. Stoneback’s background and advocacy work.

280. Defendant GPAC knew its statements to be false.

281. Defendant GPAC made the foregoing statements on and through mailer flyers (“GPAC Flyer Statements”).

282. By distributing the flyers, Defendant GPAC published the GPAC Flyer Statements and false statements contained thereon to third parties.

283. The GPAC Flyer Statements refer directly to Plaintiff by name.

284. Persons other than Ms. Stoneback, on the one hand, and Defendant GPAC, on the other hand, would have and actually have reasonably understood that the GPAC Flyer Statements related to and were about Ms. Stoneback.

285. Defendant GPAC presented the GPAC Flyer Statements as statements of fact.

286. Defendant GPAC wanted the recipients of the GPAC Flyer Statements to believe the statements to be a true and accurate representation of Ms. Stoneback’s views on background checks and gun violence prevention.

287. The GPAC Flyer Statements constituted an unprivileged publication by Defendant GPAC of false statements about Ms. Stoneback to third parties.

288. Defendant GPAC made the GPAC Flyer Statements with actual malice knowing the falsity of the statements.

289. Where Defendant GPAC did not know the falsity of any particular statements, they acted with reckless disregard for the truth.

290. As a result of the foregoing conduct of Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback has suffered and continues to suffer damages including, but not limited to, harmed reputation, harmed standing in the community, and, loss of income.

291. In addition to the foregoing, Ms. Stoneback has suffered economic harm in the form of lost income as a state representative and the monies expended on her campaign.

292. As a result of the foregoing conduct of Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback's reputation as an individual advocating for gun violence prevention has been significantly harmed.

293. As a result of the foregoing conduct of Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback's chances of success in future endeavors relating to gun violence prevention work has been negatively impacted.

294. The GPAC Flyer Statements imputed an inability to perform her duties.

295. The GPAC Flyer Statements imputed a lack of integrity as an advocate for gun violence prevention.

296. The GPAC Flyer Statements prejudiced Ms. Stoneback in her profession as a state representative and advocate for gun violence prevention.

297. Based on the foregoing, the Flyer Statements constitute defamation *per se*.

298. The foregoing conduct constitutes defamation *per se*.

299. WHEREFORE, Ms. Stoneback seeks an award of compensatory and punitive damages arising from the Defendant GPAC's *per se* defamation of her.

COUNT THREE

AS AND FOR A THIRD CAUSE OF ACTION

FALSE LIGHT INVASION OF PRIVACY

(Against Defendants Kevin Olickal and FOKO)

300. The Plaintiff hereby incorporates by reference Paragraphs 1 through 212 above as though fully set forth herein.

301. Defendants Kevin Olickal and FOKO published the FOKO First Mailer Flyer that falsely stated “[Ms. Stoneback] turned her back on the people that elected her by not supporting life-saving universal background checks, fingerprinting for gun license applications, and mental health and trauma support funding for survivors.”

302. The FOKO First Mailer Flyer also falsely stated that “Rep. Wang Stoneback failed to keep our children, families, and communities safe from illegal guns that have led to an increase in violence- we deserve better.”

303. Defendants Kevin Olickal and FOKO knew their statements in the FOKO First Mailer Flyer to be false.

304. Ms. Stoneback did not turn her back on her constituents.

305. Ms. Stoneback supported then and continues to support life-saving universal background checks, *mandatory* fingerprinting for gun license applications, and mental health and trauma support funding for survivors.

306. Ms. Stoneback did not fail to keep children, families, and communities safe from illegal guns.

307. Ms. Stoneback has advocated for more than ten years for gun violence prevention.

308. In fact, Ms. Stoneback has never voted against any gun violence prevention legislation.

309. Defendants Kevin Olickal and FOKO knew Ms. Stoneback's background and advocacy work.

310. Defendants Kevin Olickal and FOKO knew their statements to be false.

311. In June 2022, Defendants Kevin Olickal and FOKO published the FOKO Second Mailer Flyer that falsely stated "Denyse Wang Stoneback Chose to Stand with the NRA."

312. Additionally, the FOKO Second Mailer Flyer falsely stated that "[w]hile Mass Shootings Terrorized Ou[r] Country, Denyse Wang Stoneback Stood With the NRA And Ignored Victims of Gun Violence."

313. Further, the FOKO Second Mailer Flyer included the false statements: "What Do The NRA And Denyse Wang Stoneback Have In Common?" and "Together, The NRA And Denyse Wang Stoneback: ... Did NOT Support Funding To Help Communities Affected By Gun Violence; Did NOT Listen to Grieving Victims of Gun Violence When They Begged For Real Solutions."

314. Defendants Kevin Olickal and FOKO knew their statements in the FOKO Second Mailer Flyer to be false.

315. Ms. Stoneback has never stood with the NRA. Ms. Stoneback did not and does not stand with the NRA. She does not share the same views as the NRA on gun safety legislation and gun ownership.

316. Ms. Stoneback has never collaborated, partnered, or worked with the NRA.

317. Ms. Stoneback has not ignored victims of gun violence.

318. Ms. Stoneback supported and continues to support funding to help communities affected by gun violence.

319. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

320. Defendants Kevin Olickal and FOKO knew Ms. Stoneback's background and advocacy work.

321. Defendants Kevin Olickal and FOKO knew their statements to be false.

322. Further, in June 2022, Defendant FOKO published the FOKO Third Mailer Flyer that falsely stated Ms. Stoneback "SAID NO to requiring background checks on gun purchases."

323. Ms. Stoneback did not say no to requiring background checks on gun purchases.

324. In fact, Ms. Stoneback never voted "No" on any gun violence prevention legislation.

325. And, Ms. Stoneback advocated for and co-sponsored legislation that would require background checks with *mandatory* fingerprinting on gun purchases.

326. Defendants Kevin Olickal and FOKO knew Ms. Stoneback's background and advocacy work.

327. Defendants Kevin Olickal and FOKO knew their statements to be false.

328. Defendants Kevin Olickal and FOKO made the foregoing statements on and through the FOKO Flyer Statements.

329. The FOKO Flyer Statements refer directly to Ms. Stoneback by name.

330. Persons other than Ms. Stoneback, on the one hand, and Defendants Kevin Olickal and FOKO, on the other hand, would have and actually have reasonably understood that the FOKO Flyer Statements related to and were about Ms. Stoneback.

331. Defendants Kevin Olickal and FOKO presented the FOKO Flyer Statements as statements of fact.

332. Defendants Kevin Olickal and FOKO published the FOKO Flyer Statements concerning Ms. Stoneback to third parties to destroy Ms. Stoneback's political standing and reputation among the community.

333. Defendants Kevin Olickal and FOKO made the foregoing statements on and through mailer flyers mailed to multiple members of the community, including constituents of the 16th District of the Illinois House of Representatives.

334. By publishing the FOKO Flyer Statements on and through the mail sent to multiple members of the community, including constituents of the 16th District of the Illinois House of Representatives, Defendants Kevin Olickal and FOKO intentionally published the statements to a widespread audience.

335. The FOKO Flyer Statements published by Defendants Kevin Olickal and FOKO about Ms. Stoneback are and would be highly offensive to a reasonable person.

336. Defendants Kevin Olickal and FOKO published the FOKO Flyer Statements with actual malice knowing the falsity of the statements.

337. Where Defendants Kevin Olickal and FOKO did not know the falsity of any particular statements, they acted with reckless disregard for the truth.

338. The FOKO Flyer Statements cast Ms. Stoneback in a false light by imputing that Ms. Stoneback lacks integrity and ability to perform her duties within her profession.

339. The FOKO Flyer Statements cast Ms. Stoneback in a false light by imputing that she lacks integrity and ability within her profession.

340. As a result of the foregoing conduct, Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback has suffered and continues to suffer damages including, but not limited to, harmed reputation, harmed standing in the community, and, loss of income.

341. In addition to the foregoing, Ms. Stoneback has suffered economic harm in the form of lost income as a state representative and the monies expended on her campaign.

342. As a result of the foregoing conduct of Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback's chances of success in future endeavors, particularly relating to gun violence prevention, have been significantly harmed.

343. As a result of the foregoing conduct of Defendants Kevin Olickal and FOKO through the publication of the FOKO Flyer Statements, Ms. Stoneback's chances of success in future endeavors, particularly relating to gun violence prevention work, have been negatively impacted.

344. The foregoing conduct constitutes false light.

345. Based on the foregoing, the FOKO Flyer Statements cast Ms. Stoneback in a false light.

346. WHEREFORE, Ms. Stoneback seeks an award of compensatory and punitive damages arising from the Defendants' Kevin Olickal and FOKO casting her in a false light.

COUNT FOUR
AS AND FOR A FOURTH CAUSE OF ACTION
FALSE LIGHT INVASION OF PRIVACY
(Against Defendant GPAC)

347. The Plaintiff hereby incorporates by reference Paragraphs 1 through 212 above as though fully set forth herein.

348. Defendant GPAC published the First GPAC Mailer Flyer that falsely stated “[w]hen asked by grieving mothers to support legislation to keep our children, families, and communities safe... Stoneback said No!”

349. The First GPAC mailer also falsely stated that “[o]nly a politician like Denyse Wang Stoneback would tell grieving mothers she knew best” and “Rep. Denyse Wang Stoneback told grieving mothers who’ve lost children to gun violence she won’t support their legislation.”

350. Defendant GPAC knew its statements in the First GPAC Mailer Flyer to be false.

351. Ms. Stoneback did not tell grieving mothers she “knew best.”

352. Ms. Stoneback did not tell grieving mothers who lost children to gun violence that she would not support “their legislation.”

353. Ms. Stoneback has consistently supported legislation to keep children, families, and communities safe from gun violence.

354. Ms. Stoneback has never voted “No” on legislation seeking to prevent gun violence.

355. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

356. Ms. Stoneback fought and continues to fight for stronger gun violence prevention and gun safety legislation.

357. Defendant GPAC also published the Second GPAC Mailer Flyer that falsely stated “[a]s our very own REP. DENYSE WANG STONEBACK SAID NO to universal background checks on gun purchases seventy-five other elected officials said YES.”

358. The Second GPAC Mailer Flyer also falsely stated “Only a politician like Denyse Wang Stoneback would SAY NO to Universal Background Checks!”

359. Defendant GPAC knew its statements in the Second GPAC Mailer Flyer to be false.

360. Ms. Stoneback did not say “no” to universal background checks on gun purchases.

361. In fact, Ms. Stoneback never voted “No” on any gun violence prevention legislation.

362. And, Ms. Stoneback advocated for and co-sponsored legislation that would require background checks with *mandatory* fingerprinting on gun purchases.

363. Defendant GPAC published the Third GPAC Mailer Flyer that falsely stated “Why did Denyse Wang Stoneback tell grieving mothers NO to supporting universal background checks on gun purchases? ... because for politicians like Denyse Wang Stoneback it’s my way or the highway.”

364. Again, Ms. Stoneback did not tell grieving mothers “no” to supporting universal background checks on gun purchases.

365. In fact, Ms. Stoneback never voted “No” on any gun violence prevention legislation.

366. Ms. Stoneback has advocated for more than ten years for gun violence prevention.

367. Ms. Stoneback has not ignored victims of gun violence.

368. Ms. Stoneback has listened and continues to listen to grieving victims of gun violence.

369. Defendant GPAC knew Ms. Stoneback's background and advocacy work.

370. Defendant GPAC knew its statements to be false.

371. The GPAC Flyer Statements refer directly to Ms. Stoneback by name.

372. Persons other than Ms. Stoneback and Defendant GPAC would have and actually have reasonably understood that the Flyer Statements related to and were about Ms. Stoneback.

373. Defendant GPAC presented the GPAC Flyer Statements as statements of fact.

374. Defendant GPAC published the GPAC Flyer Statements concerning Ms. Stoneback to third parties to destroy Ms. Stoneback's political standing and reputation among the community.

375. Defendant GPAC made the foregoing statements on and through mailer flyers mailed to multiple members of the community, including constituents of the 16th District of the Illinois House of Representatives.

376. By publishing the GPAC Flyer Statements on and through the mail sent to multiple members of the community, including constituents of the 16th District of the Illinois House of Representatives, Defendant GPAC intentionally published the statements to a widespread audience.

377. The GPAC Flyer Statements published by Defendant GPAC about Ms. Stoneback are and would be highly offensive to a reasonable person.

378. Defendant GPAC published the GPAC Flyer Statements with actual malice knowing the falsity of the statements.

379. Where Defendant GPAC did not know the falsity of any particular statements, they acted with reckless disregard for the truth.

380. The GPAC Flyer Statements cast Ms. Stoneback in a false light by falsely imputing that Ms. Stoneback lacks integrity and ability to perform her duties within her profession.

381. The GPAC Flyer Statements cast Ms. Stoneback in a false light by falsely imputing that she lacks integrity and ability within her profession.

382. As a result of the foregoing conduct, Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback has suffered and continues to suffer damages including, but not limited to, harmed reputation, harmed standing in the community, and, loss of income.

383. In addition to the foregoing, Ms. Stoneback has suffered economic harm in the form of lost income as a state representative and the monies expended on her campaign.

384. As a result of the foregoing conduct of Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback's chances of success in future endeavors relating to gun violence prevention work has been negatively impacted.

385. As a result of the foregoing conduct of Defendant GPAC through the publication of the GPAC Flyer Statements, Ms. Stoneback's chances of success in future endeavors, particularly relating to gun violence prevention, have been significantly harmed.

386. The foregoing conduct constitutes false light.

387. Based on the foregoing, the GPAC Flyer Statements cast Ms. Stoneback in a false light.

388. WHEREFORE, Ms. Stoneback seeks an award of compensatory and punitive damages arising from Defendant GPAC casting her in a false light.

COUNT FIVE
AS AND FOR A FIFTH CAUSE OF ACTION
CIVIL CONSPIRACY
(Against all Defendants)

389. The Plaintiff hereby incorporates by reference Paragraphs 1 through 388 above as though fully set forth herein.

390. The Defendants' false statements about Ms. Stoneback shall collectively be referred to as the "False and Defamatory Statements."

391. Defendants, each of them individually and together, worked and acted in concert with one another in an agreed upon plan and scheme to make and publish to third parties, without privilege, the False and Defamatory Statements about Ms. Stoneback to the Defendants' benefit and Ms. Stoneback's detriment.

392. Defendants defamed Ms. Stoneback and cast her in a false light.

393. Defendants have acted with actual malice.

394. Specifically, the Defendants published false statements about Ms. Stoneback knowing them to be untrue.

395. Where the Defendants did not know any specific statement to be untrue, the Defendants published such statement in reckless disregard for its veracity.

396. Ms. Stoneback has been and shall continue to be harmed by the civil conspiracy between the Defendants.

397. The specific aims, intents, and objectives of Defendants' plan and scheme included, but were not limited to: publishing false statements about Ms. Stoneback; destroying

Ms. Stoneback's reputation as a strong advocate for gun violence prevention built over nearly ten years of work; harming Ms. Stoneback's reputation within her community; publishing false statements about Ms. Stoneback that impute a lack of integrity, impute an inability to perform; and, prejudice her in her profession; and, defaming and harming her character.

398. Each defendant directly and purposefully engaged in unlawful actions in furtherance of the civil conspiracy.

399. Ms. Stoneback has suffered damages to her reputation.

400. Ms. Stoneback has suffered damages to her reputation as a strong advocate for gun violence prevention.

401. Ms. Stoneback suffered damages in her profession as a state representative in that she was not re-elected as State Representative of the 16th District.

402. As a result of Defendants' agreed upon conspiracy, Ms. Stoneback has suffered and continues to suffer reputational damages pertaining to her integrity and ability to perform in her profession.

403. As a result of the Defendants' conduct and the publication of the False and Defamatory Statements, Ms. Stoneback has suffered and continues to suffer damages including, but not limited to, loss of income, harmed reputation, and, harmed standing in the community.

404. As a result of the Defendants' conduct, conspiracy, and the publication of the False and Defamatory Statements, Ms. Stoneback's reputation as a strong advocate for gun violence prevention with her community, state politics, and state government has been harmed.

405. The Defendants' conduct, conspiracy, and the publication of the False and Defamatory Statements has greatly impacted her chances of success in future endeavors.

406. Having engaged in a civil conspiracy and concerted action with respect to the False and Defamatory Statements, each co-conspirator is jointly and severally responsible and liable for the actions of the other co-conspirator in furtherance of the civil conspiracy and tortious conduct as well as the harm and damages emanating therefrom.

407. Defendant GPAC is responsible for the acts of Defendants Kevin Olickal and FOKO through this civil conspiracy count.

408. Defendants Kevin Olickal and FOKO are responsible for the acts of Defendant GPAC through this civil conspiracy count.

409. WHEREFORE, Ms. Stoneback seeks an award of compensatory and punitive damages arising from the Defendants' civil conspiracy against her.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF DENYSE WANG STONEBACK accordingly and respectfully prays for judgment against DEFENDANTS GUN VIOLENCE PREVENTION PAC GPAC, KEVIN OLICKAL, and FRIENDS OF KEVIN OLICKAL as follows:

A. That Plaintiff Denyse Wang Stoneback be awarded compensatory damages in an amount to be determined at trial;

B. That Plaintiff Denyse Wang Stoneback be awarded punitive damages in an amount to be determined at trial; and

C. That Plaintiff Denyse Wang Stoneback be awarded any such other and further relief as this Court may deem just and proper or to which Plaintiff may be entitled as a matter of law and equity.

Dated: Chicago, Illinois
May 9, 2023

Respectfully submitted.

Denyse Wang Stoneback

/s/Charles Lee Mudd Jr.
By: One of Her Attorneys
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**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION**

DENYSE WANG STONEBACK,)
)
 Plaintiff,)
)
 v.)
)
 KEVIN OLICKAL, FRIENDS OF)
 KEVIN OLICKAL, and,)
 GUN VIOLENCE PREVENTION PAC,)
)
 Defendants.)
)

Case No.:

JURY DEMAND

JURY DEMAND

The Plaintiff demands trial by jury.

/s/Charles Lee Mudd Jr.
Charles Lee Mudd Jr.