

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS

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

ERIC UNGER

Plaintiff,

vs.

[REDACTED] a Defendant and
respondent in discovery,
TWITTER USER "NO-ZONE FOR ABUSERS")
as a Defendant
and respondent in discovery, and
COALITION FOR MUSICIAN VICTIM
OF HARASSMENT AND ASSAULT as
a Defendant and respondent in discovery
Defendants.

)
)
) Case No.: 2017L008596
) Amount Claimed: CALENDAR/REG
) in excess of \$100,000 + Costs TIME 00:00
) Return Date: Tort - Int
) PERSONAL INJURY - OTHER
)
)
)
)
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)
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2017 AUG 24 PM 3:34
FILED
CIRCUIT COURT
LAW DIVISION

- COMPLAINT AT LAW -

COUNT I

ERIC UNGER v. [REDACTED]
DEFAMATION

NOW COMES Plaintiff, ERIC UNGER, by and through attorneys, FABBRINI LAW GROUP, LLC, and complaining of Defendant, [REDACTED] states as follows:

1. Plaintiff, ERIC UNGER, is a resident of COOK County, Illinois, with his principal residence located at 4544 N. LINCOLN AVENUE, CHICAGO, IL 60625.
2. Defendant, [REDACTED] is a resident of COOK County, Illinois, with her principal residence located at [REDACTED]
3. On AUGUST 24TH, 2016, Defendant, [REDACTED] published to DAN APODACA at SCHUBA'S TAVERN and STEPHANIE MAIERITSCH various statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit A.
4. The statements contained in Exhibit A are false and defamatory.

5. On MARCH 23RD, 2017, Defendant, [REDACTED] published to Twitter.com additional statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit B.

6. The statements contained in Exhibit B are false and defamatory.

7. On APRIL 20TH, 2017, Defendant, [REDACTED] published to Twitter.com various statements regarding Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit C.

8. The statements contained in Exhibit C are false and defamatory.

9. As a proximate result of the foregoing defamatory statements by Defendant, Plaintiff suffered damages to his reputation, as well as pecuniary losses.

10. The foregoing defamatory statements were made by Defendant with the knowledge of their falsity and with actual malice.

WHEREFORE, Plaintiff, ERIC UNGER, respectfully requests this Honorable Court enter judgment against Defendant, [REDACTED] and in favor of Plaintiff, in an amount to exceed ONE HUNDRED THOUSAND DOLLARS (\$100,000), plus costs of the suit.

COUNT II
ERIC UNGER v. TWITTER USER "NO-ZONE FOR ABUSERS"
DEFAMATION

NOW COMES Plaintiff, ERIC UNGER, by and through attorneys, FABBRINI LAW GROUP, LLC, and complaining of Defendant, TWITTER USER "NO-ZONE FOR ABUSERS", states as follows:

1. Plaintiff, ERIC UNGER, is a resident of COOK County, Illinois, with his principal residence located at 4544 N. LINCOLN AVENUE, CHICAGO, IL 60625.

2. Defendant, TWITTER USER "NO-ZONE FOR ABUSERS", is a resident of COOK County, Illinois, with her principal residence located at [REDACTED]

3. On AUGUST 24TH, 2016, Defendant TWITTER USER "NO-ZONE FOR ABUSERS", published to DAN APODACA at SCHUBA'S TAVERN and STEPHANIE MAIERITSCH

various statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit A.

4. The statements contained in Exhibit A are false and defamatory.

5. On MARCH 23RD, 2017, Defendant, TWITTER USER "NO-ZONE FOR ABUSERS, published to Twitter.com additional statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit B.

6. The statements contained in Exhibit B are false and defamatory.

7. On APRIL 20TH, 2017, Defendant, TWITTER USER "NO-ZONE FOR ABUSERS, published to Twitter.com various statements regarding Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit C.

8. The statements contained in Exhibit C are false and defamatory.

9. As a proximate result of the foregoing defamatory statements by Defendant, Plaintiff suffered damages to his reputation, as well as pecuniary losses.

10. The foregoing defamatory statements were made by Defendant with the knowledge of their falsity and with actual malice.

WHEREFORE, Plaintiff, ERIC UNGER, respectfully requests this Honorable Court enter judgment against Defendant, TWITTER USER "NO-ZONE FOR ABUSERS, and in favor of Plaintiff, in an amount to exceed ONE HUNDRED THOUSAND DOLLARS (\$100,000), plus costs of the suit.

COUNT III
ERIC UNGER v. COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND
ASSAULT
DEFAMATION

NOW COMES Plaintiff, ERIC UNGER, by and through attorneys, FABBRINI LAW GROUP, LLC, and complaining of Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, states as follows:

1. Plaintiff, ERIC UNGER, is a resident of COOK County, Illinois, with his principal residence located at 4544 N. LINCOLN AVENUE, CHICAGO, IL 60625.

2. Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, is a resident of COOK County, Illinois, with her principal residence located at [REDACTED]

3. On AUGUST 24TH, 2016, Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, published to DAN APODACA at SCHUBA'S TAVERN and STEPHANIE MAIERITSCH various statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit A.

4. The statements contained in Exhibit A are false and defamatory.

5. On MARCH 23RD, 2017, Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, published to Twitter.com additional statements about Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit B.

6. The statements contained in Exhibit B are false and defamatory.

7. On APRIL 20TH, 2017, Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, published to Twitter.com various statements regarding Plaintiff, ERIC UNGER. A copy of this document is attached hereto as Exhibit C.

8. The statements contained in Exhibit C are false and defamatory.

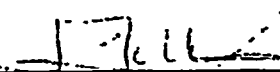
9. As a proximate result of the foregoing defamatory statements by Defendant, Plaintiff suffered damages to his reputation, as well as pecuniary losses.

10. The foregoing defamatory statements were made by Defendant with the knowledge of their falsity and with actual malice.

WHEREFORE, Plaintiff, ERIC UNGER, respectfully requests this Honorable Court enter judgment against Defendant, COALITION FOR MUSICIAN VICTIM OF HARASSMENT AND ASSAULT, and in favor of Plaintiff, in an amount to exceed ONE HUNDRED THOUSAND DOLLARS (\$100,000), plus costs of the suit.

#43161
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Respectfully Submitted,



Attorney for Plaintiff



Stephanie Maleritsch <maleritsch@gmail.com>

Stephanie from Nest here

Dan Apodaca <dan@schubas.com>
To: Steph <maleritsch@gmail.com>

Wed, Aug 24, 2016 at 7:53 PM

I got this email today. Do you know anything about this?

—

Dear Schuba's,

It has come to our attention that an openly known and documented abuser of multiple women in the Chicago music industry, a male member of the band Nest, is scheduled to perform at Schuba's Wednesday the 31st at 9pm as part of the 100% free show series. It is openly known in the community that he has assaulted, stalked, and harassed and threatened several current and former female musicians and coworkers at the Old Town School of Folk Music as well as local female musicians and industry members in the community and the band continues to attempt to book shows where past victims are employed, attend shows and perform.

In order to protect the women of the local music community and former coworkers who fear their safety after continued stalking and harassment, this must end.

We ask you to please adhere to the safety policy advertised at prior shows for crowd members to extend to the entirety of the venue, including the stage and green room on Wednesday the 31st. The continued harassment of other bands, bookers, participants and attendees is unacceptable. While we're huge fans of BLOOM, Impulsive Hearts and Jessica Tenuta's work, we wish for the show on the 31st to continue safely with the physical integrity of female fans, remaining bands on the bill, and Schuba's / Lincoln Hall's reputation as the foremost priority. We are able to notify other planned attendees but ask you to support the women who have spoken up and come forward and those who cannot for fear of retaliation and further harassment or physical contact in and out of the workplace.

We ask you to make the 100% free show series a 100% safe space as the LCD signs and policy dictate and support the safe attendance of musicians and fans who have also been victims of sexual assault, violence, stalking and harassment by others in the music community.

Thank you for your time and we hope to continue patronizing both Schuba's and Lincoln Hall, safe and assault-free, with your privately or publicly voiced support.

Sincerely,
Coalition for Musician Victims of Harassment and Assault

[Quoted text hidden]



Problematic Pubs

I'm never going to stop calling out people: I am going to reorganize how I do it.



No Zone for Abusers

I have male names that should definitely be known, to protect women.

EXHIBIT B

2:39 AM - 20 Apr 2017



No-Zone for Abusers @HaterAid5 Apr 20

.@vice .@britt:cisms Small scene means big crimes go unpunished &
.@theemptybottle workers get hurt. @sofarsounds sells tix to see yr rapist



No-Zone for Abusers @HaterAid5 - Apr 20

.@britt:cisms Alexander Kime, Eric Unger, R. Kelley... your city's booking has a
problem, while LA shuts down rapists, domestic abusers. Hmm



No-Zone for Abusers @HaterAid5 - Apr 20

.@britt:cisms Time for an article on how men hide alongside "women-fronted"
products to conceal gendered crimes? Same as the comedy industry

EXHIBIT C



No-Zone for Abusers
 Let's protect the girls & women identified of all ages & prevent
 4/22 Speed Shoo from coming up to trauma & irreparable harm



No-Zone for Abusers
 We're talking the frontwoman / cowriter / girlfriend of her BASSIST
 who assured former coworkers. The school called her out



No-Zone for Abusers
 Not cool to bring in acts w/ no past involvement for a whisp to
 have a frontwoman sing her love songs + sign a "sexual contract"



No-Zone for Abusers
 4/22 would be the first year a known bully & abuser has harassed
 women & girls attending yr concert + trying to get girls



No-Zone for Abusers
 Please ask around & screen your Speed Shoo on 4/22. Three
 women concerned they'll see their abuser on the list of music acts.



No-Zone for Abusers
 A certain famous comedian named Both posts her brutes on Insta. Perp
 comedian gets shunned for fire from the industry. Music: CAI CR UR



No-Zone for Abusers
 The music scene means no comes go unharmed &
 just means the women got hurt, the music scene is to see yr raps