

in this judicial district and all acts and events giving rise to claims in this case occurred in Cook County, Illinois and jurisdiction is proper in the Northern District of Illinois, Eastern Division.

III. THE PARTIES

4. Plaintiff, ANETA HADZI-TANOVIC, individually (hereafter “Aneta”) and as natural mother and next friend for SP, KP and MP, all minors (hereafter collectively with Aneta referred to as “Plaintiffs”), is a resident of Cook County and State of Illinois.

5. At all times relevant herein, Aneta was a party in a case in the Circuit Court of Cook County, Illinois known as case no.: 2014 D 009779, and entitled: Slobodan Pavlovich vs. Aneta Pavlovich n/k/a Hadzi-Tanovic.

6. Aneta is an attorney, licensed to practice law in the State of Illinois and her license is in good standing.

7. Defendant, ASSOCIATE JUDGE ROBERT W. JOHNSON (hereafter “Associate Judge Johnson”), is a resident of Cook County, Illinois and employed as an Associate Judge with the Circuit Court of Cook County, Illinois and at all times relevant was a Cook County Associate Judge assigned to handle case number: 2014 D 009779.

8. At all relevant times, Associate Judge Johnson was acting under the authority or color of Illinois law at the time these claims occurred.

9. Defendant, DAVID P. PASULKA, is a resident of Cook County, Illinois and is an attorney, licensed to practice law in the State of Illinois and his license is in good standing (hereafter referred to as “David P. Pasulka”).

10. At all relevant times, David P. Pasulka was one of the GALs (Guardians *Ad Litem*) in the Cook County of Illinois, and therefore had substantial influence on most of Cook

County Judges and was at all times relevant able to influence Associate Judge Johnson's decisions.

11. Defendant, SLOBODAN M. PAVLOVICH (hereafter referred to as "Slobodan"), is a resident of Cook County and State of Illinois.

12. At all times relevant herein, Slobodan was a party in a case in the Circuit Court of Cook County, Illinois known as case no.: 2014 D 009779, and entitled: Slobodan Pavlovich vs. Aneta Pavlovich n/k/a Hadzi-Tanovic.

13. At all times relevant, Slobodan was out to accomplish destroying his ex-wife, and the mother of their three children, Aneta, personally, psychologically, financially, professionally as well as Aneta's relationship with their three minor children.

14. Aneta and Slobodan were married to one another and as a result of that marriage three children were born: SP, KP and MP and their marriage was dissolved by a Judgment.

IV. FACTS COMMON TO ALL COUNTS

15. On October 24, 2014, Slobodan filed proceedings for dissolution of marriage (hereafter referred to as the "Pavlovich dispute") in the Circuit Court of Cook County, Illinois and the case was entitled: In re Marriage of Slobodan Pavlovich, Petitioner and Aneta Pavlovich n/k/a Aneta Hadzi-Tanovic, Respondent, Case No. 2014 D 009779.

16. As part of the Pavlovich dispute, Aneta and Slobodan had and have three minor children whose allocation of parental responsibilities and allocation of parental time and physical custody has become and evolved into a hotly contested parental decision making dispute f/k/a custody dispute.

17. Throughout the Pavlovich dispute, Slobodan continuously, falsely and

maliciously alleged that Aneta was physically and mentally abusing their three minor children and Slobodan initiated numerous complaints against Aneta with Department of Children and Family Services (hereafter “DCFS”) and investigations followed. All of the DCFS’ complaints against Aneta were dismissed as unfounded and Aneta’s parenting time and parenting rights and duties stayed unchanged.

18. On August 29, 2016, David P. Pasulka from David P. Pasulka and Associates, P.C., was appointed as the Guardian *Ad Litem* (hereafter “GAL”) for the Pavlovich - three minor children by a Judge from the Circuit Court of Cook County.

19. The hotly contested issue between Slobodan and Aneta was the part of a dissolution of marriage where there is an allocation of parental responsibilities. Slobodan continuously alleged falsely and maliciously that Aneta was physically abusing the children and specifically alleged that Aneta abused SP their oldest son.

20. David P. Pasulka began to investigate Slobodan’s allegations of physical abuse by Aneta and on October 21, 2016, David P. Pasulka, sent an email to both Aneta and Slobodan’s attorneys and the child representative for parties’ three minor children which provided as follows:

“I [David P. Pasulka] spoke to Ms. Sue Moon, the DCFS worker assigned to the Pavlovich case. She informed me that she spoke with Aneta and Sloba and [the parties] all three minor children regarding the allegations [made by Slobodan] that Aneta hit the children. **Ms. Moon believes that Aneta is not coaching the children as to what to say. She [Ms. Sue Moon from DCFS] believes that Sloba is coaching, or at least suggesting to the children what to say.** (Emphases added.)

Sue [Moon, DCFS worker] reported there was **NO EVIDENCE of physical abuse and**

the children denied physical abuse by mom. [Emphases added.] Again, she did not believe that Aneta was coaching the children. **She believes that the children are very comfortable with their mom. Ms. Moon will recommend that these allegations are unfounded.**” [Emphases added.] A copy of David P. Pasulka’s email sent on October 21, 2016, is attached and marked Plaintiff’s Exhibit “A.”

21. Absolutely nothing further was done throughout the following litigation, by either David P. Pasulka or by Associate Judge Johnson, to follow up on Ms. Sue Moon’s beliefs and findings of her investigation, even though same and similar statements and testimony were presented by the minor children over and over again, as well as by police officers, social workers, and other independent witnesses.

22. Furthermore, throughout the litigation and especially since April 2017 to the present time David P. Pasulka has committed perjury multiple times as he reported to the court and to Associate Judge Johnson that Aneta has been coaching the children what to say and that Aneta’s parenting time should be supervised.

23. On November 3, 2016, Aneta filed a “Petition for Rule to Show Cause and for Finding of Indirect Civil Contempt” for Slobodan’s failure to follow the Order entered on February 26, 2015 and Order of August 31, 2015, regarding bringing the children to their individual therapy and believing that Slobodan was physically and verbally abusing the children, forcing the children what to say and forcing the children to lie that Aneta has been supposedly abusing them throughout the litigation.

24. On November 3, 2016, Aneta also filed a “Motion for Section 604.10(b) Evaluator,” in which Aneta alleged:

...

7. Through this instant litigation, Slobodan has falsely alleged on multiple occasions that Aneta is abusing, neglecting, or otherwise mistreating the minor children, to wit:

a. During January and February, 2015, Aneta represented herself pro se in this matter. Counsel for Slobodan sent notice to Aneta of prove up hearing for the Judgment for Dissolution of Marriage and Marital Settlement Agreement which counsel for Slobodan had prepared and scheduled for February 24, 2015. ...

b. On or about February 23, 2015, Aneta advised Slobodan that she had obtained counsel, and could not sign the Marital Settlement Agreement prepared by his counsel ... Aneta left the marital residence with the children to stay with a friend for the night, and informed Slobodan that she would drop the children off at school in the morning.

c. That evening, the Northbrook Police Department called Aneta and informed her that Slobodan alleged that she abuses the children, and specifically reported an incident that allegedly occurred three (3) weeks prior. A copy of the Northbrook Police Department Case Number 15-03224 report was incorporated herein ... **The responding police officer noted, “I advised Slobodan that it appeared he was being vindictive towards his wife because he reported this incident three weeks after this incident allegedly occurred and after she reneged on their divorce paperwork the day he reported it and one day before their court date.”** (Emphases added.) [In Slobodan’s Response, Slobodan admitted the cited quote from the Northbrook Police Officer is included in the report].

d. The police, as mandated reporters, reported Slobodan’s allegations to the Illinois Department of Children and Family Services (“DCFS”). **DCFS later informed Aneta that they found the report to be “unfounded.”** (Emphases added.)... [In Slobodan’s Response, Slobodan admitted the allegations alleged in Subparagraph 7(d)].

e. On February 24, 2015, Slobodan filed an Emergency Petition for Temporary Sole Custody and Possession of the Minor Children, for Exclusive Possession of the Marital Residence, for Respondent's Visitation to be Supervised and for Other Relief (“First Emergency Petition”). [In Slobodan’s Response, Slobodan admitted the

allegations alleged in Subparagraph 7(e)].

f. On February 26, 2015, in lieu of attending emergency intervention, the parties entered an Agreed Order whereby Aneta voluntarily vacated the marital residence, and the parties agreed to have equal parenting time. [In Slobodan's Response, Slobodan admitted the allegations alleged in Subparagraph 7(f)].

...

h. During late June, 2015 and early July, 2015, the parties' children informed Aneta that Slobodan was coercing and threatening them to say that [Aneta, their Mom] was abusing them.

i. On July 16, 2015, the parties were before this Honorable Court for a hearing on various matters. [In Slobodan's Response, Slobodan admitted these allegations alleged in Subparagraph 7(i)].

j. On July 20, 2015, Slobodan filed an Emergency Petition for Emergency Intervention and Other Relief ("Second Emergency Petition"), in which he cited alleged incidents of abuse by Aneta that had occurred prior to the July 16, 2015 hearing. [In Slobodan's Response, Slobodan admitted these allegations alleged in Subparagraph 7(j)]. From Friday, July 17, 2015 until the day of presentment of his Second Emergency Motion in court on Tuesday, July 21, 2015, Slobodan refused to allow Aneta to speak to the children during his weekend and weekday parenting time.

k. On July 21, 2015, the parties were again referred to emergency intervention, which they attended that day, and ordered to attend therapy. [Slobodan's allegations of Aneta's abuse of the children were unfounded and there was no change in parenting time schedule.]

l. On Friday, September 23, 2016, during Slobodan's parenting weekend, the children reported alleged abuse by Aneta to their therapists. As mandated reporters, Youth Services of Glenview/Northbrook reported the children's statements to DCFS, and informed Aneta of same on Monday, September 26, 2016. Aneta later learned that DCFS chose not to pursue an investigation based upon the vagueness of the allegations. [In Slobodan's Response, Slobodan denied that he refused to allow Aneta to speak with the

children, but, admitted all remaining allegations of Subparagraph 7(l)].

m. On or about September 26, 2016, Slobodan e-mailed Mr. Pasulka and made allegations of recent abuse of the children by Aneta, described in such great detail it seemed as though he personally experienced them. A copy of said e-mail was made available to the Court upon request. [In Slobodan's Response, Slobodan admitted that he sent an email to Mr. Pasulka on September 26, 2015].

n. Upon information and belief, Slobodan called DCFS and falsely reported that Aneta was abusing the children on or about September 29, 2016, after learning DCFS was not pursuing an investigation based upon the September 23, 2016 statements of the children to their therapists. [In Slobodan's Response, Slobodan denied these allegations alleged in Subparagraph 7(n)].

o. DCFS chose to investigate the September 29, 2016 report they received. They attempted to visit the children at their after-school care, the YMCA, on October 3, 2016, but the children were on a field trip; thus, they visited the children at school on October 4, 2016. [In Slobodan's Response, Slobodan admitted these allegations alleged in Subparagraph 7(o)].

p. DCFS called Aneta on October 5, 2016 to inform her they were pursuing an investigation of the report. They visited the children and Aneta at her residence on October 6, 2016. [In Slobodan's Response, Slobodan stated that he does not have the requisite knowledge with which to admit or deny the allegations alleged in Subparagraph 7(p)].

q. Per Mr. Pasulka, the DCFS worker, Sue Moon, informed him on October 21, 2016, that after meeting with Aneta and the children, she does not believe that Aneta is abusing the children, but believes that Slobodan is coaching, or at minimum suggesting to, the children to make allegations of abuse against Aneta. Ms. Moon informed Mr. Pasulka that she will recommend that the allegations against Aneta are unfounded. [In Slobodan's Response, Slobodan stated that he does not have the requisite knowledge with which to admit or deny the allegations alleged in Subparagraph 7(q)].

r. **The children have regularly informed Aneta during and throughout this**

litigation, including the week of October 2, 2016, that Slobodan forces them to say she is beating them, punishes them unless they repeat the allegations, and tells them that he will know if they tell “the truth” (e.g., to their therapists, the school social worker, Ms. Wypych, Mr. Pasulka, and the DCFS worker). Ms. Moon's findings affirm the children's statements to Aneta. (Emphases added.) [In Slobodan’s Response, Slobodan stated that he does not have the requisite knowledge with which to admit or deny the allegations alleged in Subparagraph 7(r)].

The allegations in this motion and the motion itself were ignored by David P. Pasulka and were continued to be ignored time and time again with no investigation by David P. Pasulka.

25. Prior to filing his Petition for Dissolution of Marriage and throughout this Pavlovich dispute, Slobodan has regularly threatened Aneta that he will report her for alleged abuse in order to obtain what he wants, and Slobodan told Aneta that he will “destroy” her, and that he will ensure that she never sees the children again.

26. Since Aneta refused to sign the Marital Settlement Agreement proposed by his attorneys, Slobodan continuously made false accusations and attempted to alienate Aneta from the children in a campaign of denigration that has pervaded the lives of the parties and the children.

27. Slobodan achieved his threats with the assistance of David P. Pasulka and Associate Judge Johnson and as a result of the conspiracy Aneta and her three minor children: SP, KP and MP have suffered severely from the violations of their Constitutional rights.

28. Aneta’s motions mentioned above were continued time and time again and on March 15, 2017, the matter was assigned to newly appointed associate judge, Defendant, Associate Judge Robert W. Johnson, and a hearing on Aneta’s Motion for 604.10(b) Evaluator

was set for April 20, 2017.

29. On April 17, 2017, Aneta filed an Addendum to Motion for 604.10(b) Evaluator where she alleged additional reasons why a Section 604.10(b) Evaluator was necessary and some of those additional reasons provided several examples of violent and abusive conduct by Slobodan and significant behavioral and emotional issues experienced by the children which had significantly increased over the past few months.

30. On April 20, 2017, Associate Judge Johnson entered an order that denied Aneta's Motion for Section 604.10(b) Evaluator, continued the entry of Allocation Judgment to May 15, 2017, and set trial for June 12, 2017.

31. On May 15, 2017, an order was entered that continued the matter for pretrial conference on May 23, 2017. Subsequently, on May 23, 2017, an order was entered that continued the matter to June 5, 2017 for status on settlement. Lastly, on June 5, 2017, an order was entered for entry of Allocation Judgment on June 12, 2017.

32. On June 8, 2017, at 8:28 am, Aneta's attorneys at the time in the Pavlovich dispute filed a Motion to Withdraw as Aneta's attorneys and set the motion for presentment at 9:30 am that same day, June 8, 2017.

33. The Certificate and Affidavit of Delivery provided that this Notice and Motion for Withdrawal was served on Aneta by email before 5:00 pm on June 7, 2017. The notice informed Aneta that the Motion to Withdraw was set to be presented to Associate Judge Johnson on June 8, 2017, at 9:30 am.

34. On June 8, 2017, Associate Judge Johnson granted the Motion to Withdraw as Aneta's attorneys and Associate Judge Johnson refused to grant Aneta 21 days to obtain

substitute counsel pursuant to Illinois Supreme Court Rule 13, and refused to postpone the trial.

35. On June 12, 2017, at 9:00 am Aneta appeared in court with just retained substitute attorney and pursuant to an oral motion asked Associate Judge Johnson that the trial be continued to allow substitute counsel to file appearance and prepare her case for trial. Aneta's oral motion to continue trial was denied at 10:48 am by Associate Judge Johnson and Aneta was forced to sign an Allocation Judgment of Parenting Responsibilities and Parenting Plan (hereinafter "AJ") as prepared by Slobodan's attorney and the trial on the Dissolution of Marriage began and continued through the late afternoon of June 13, 2017.

36. Per the AJ that Aneta was forced to sign, Slobodan and Aneta had fifty-fifty (50/50) parenting time. Slobodan had the three minor children every Monday and Tuesday; Aneta had the three minor children every Wednesday and Thursday; Slobodan and Aneta each had the minor children every other weekend, Friday through Sunday.

37. An unconscionable Judgment for Dissolution of marriage was entered and Aneta's motions to reconsider were denied and the judgment for dissolution and Judgment for Allocation of Parental Responsibilities were affirmed not on the merits, but because no court reporter was available to appear in court on less than 24 hours notice and therefore Aneta did not have a transcript to provide to the Appellate Court of the June 8, 2017, hearing nor of the trial.

38. In November 2017, December 2017, and January 2018, Slobodan was becoming extremely mad, vicious, and even aggressive towards the minor children because the minor children were participating in band and orchestra at their schools. Slobodan made extremely demeaning, insulting and abusive statements to his children and made fun of them regarding their participation in band. Additionally, Slobodan further abused the minor children by

withholding his children's instruments so his minor children could not participate in band, and also forbid the minor children to practice their instruments (i.e. trombone and cellos) when the children were with Slobodan.

39. Further, because the minor children expressed their desire to remain in band and in orchestra at their schools, Slobodan would punish the minor children by locking the minor children in their bedrooms for several hours.

40. Since the Dissolution of Marriage was entered, David P. Pasulka was no longer the GAL for the three minor children, but per the AJ he was the Mandatory Arbitrator for the extracurricular activities only. However, Slobodan invited David P. Pasulka to become involved over the issues of children's school classes.

41. The children's school, Wood Oaks advised that according to the School District 27, the band and orchestra although elective ARE CURRICULAR GRADED CLASSES, not extracurricular.

42. Aneta disputed that David P. Pasulka had the jurisdiction or the authority to be involved in the parents' dispute over a school's curricular graded classes - band and orchestra.

43. It was not until January 31, 2018, that a certain December 18, 2017, court order surfaced up, when David P. Pasulka emailed it to both parties. This was the first time that Aneta or her counsel ever saw or were made aware of the December 18, 2017 court order and that band and/or orchestra issue was brought in front of the Court. December 18, 2017 court order was printed up on the computer and obviously it was previously prepared.

44. On December 18, 2017 in an ex-parte hearing an order was entered that stated as follows:

“The children’s band participation shall constitute an “extracurricular activity” and as such, any issue regarding the same shall be arbitrated by the Guardian ad Litem in accordance with the Allocation Judgment entered on June 12, 2017.”

45. The order entered on December 18, 2017, provided the David P. Pasulka no other authority and no other power, and said order was entered to resolve the dispute between Slobodan and Aneta to decide whether the three minor children remained participating in band.

46. There was neither motion nor notice of motion ever filed regarding children’s participation in band and/or orchestra, and there was no motion ever filed on the issue of whether children’s school class of band and/or orchestra is a curricular school class or extracurricular activity.

47. David P. Pasulka secretively and ex-parte spoke with the children while the children were with Slobodan and never notified Aneta about his meetings and interactions with the minor children.

48. Furthermore, David P. Pasulka reported to Slobodan and Aneta via email that two of the children (presumably SP and KP) wanted to continue remain in band/orchestra school class, and that one minor child (presumably MP) did not want to continue to remain in the band/orchestra school curricular class.

49. When Slobodan received that information from David P. Pasulka, Slobodan became enraged and he punished SP by screaming at him and by locking him in his bedroom for several hours at a time.

50. Because of this abuse mentioned above, SP no longer wanted to stay with his father, Slobodan, and because he was so scared of what his father had threatened to do to him, on

January 31, 2018, SP and the other two minor children reported Slobodan's abuse to social workers at their schools.

51. On January 31, 2018, in response to her son's requests, Aneta brought SP to the police department to make a police report and the police department interviewed SP and contacted DCFS, and on February 22, 2018, DCFS conducted a forensic interview of all three of the parties' minor children at Children's Advocacy. The forensic Advocacy Interview was recorded both video and audio. Further, on February 12, 2018, DCFS Investigator Richard De Lahaza directed a school's principal and school's social worker not to release the minor children to Slobodan and directed the minor children to go home with Aneta. For further proof, please see Northbrook Police Department Report from February 12, 2018, which is attached and marked Plaintiff's Exhibit "B."

52. On February 12, 2018, while Aneta was picking up the children at their school, Aneta was contacted by DCFS and through a telephone call Aneta was told not to let the minor children be with their father, Slobodan, while the allegations made by the three minor children were being investigated.

53. On February 13, 2018, Slobodan filed an Ex Parte Emergency Motion for Temporary Suspension of Aneta's Parenting Time or in the Alternative for Aneta's Parenting Time to be Supervised. Slobodan's Ex Parte Emergency Motion argued:

"From February 9, 2018 through February 11, 2018, Aneta refused to afford Slobodan his court ordered parenting time with KP and SP.

...

On February 12, 2018, Aneta instructed each child's school to withhold said child from

Slobodan without Slobodan's knowledge or consent.

...

Aneta's incessant attempts to manipulate DCFS and the Northbrook Police Department has placed the minor children under immense pressure while simultaneously (and successfully) depriving Slobodan of the parenting time he should receive pursuant to this court's order."

54. On February 13, 2018, Slobodan appeared ex parte before the trial court and an order was entered that declared the matter an emergency. Further, the minor children's schools (Shabonee and Wood Oak Schools) and all law enforcement departments were directed to release all three minor children directly to Slobodan, and Aneta was ordered not to interfere with any Slobodan's court ordered parenting time. The matter was continued to February 14, 2018, for a hearing.

55. On February 14, 2018, the trial court provided a hearing and David P. Pasulka, who was never reappointed as GAL, testified and stated that he was aware of the allegation that Slobodan was punishing his minor child because his minor child stated he wanted to participate in band and that it was further alleged that Slobodan was grounding SP by making him remain in his room because Slobodan was enraged that SP told David P. Pasulka that he wanted to remain participating in band at school. David P. Pasulka testified that in his opinion, Slobodan posed no threat to his children.

56. **Even though it was proved that Slobodan would press his fist into his minor boys' chest very hard and twist his fist to cause the boys pain and that Slobodan would squeeze the boys' heads between his two hands and cause pain and discomfort, David P.**

Pasulka did nothing about it and characterized Slobodan's physical and mental abuse as "fooling around" even though the boys expressed that these maneuvers were very painful and causing them fear. **Further on cross-examination, David P. Pasulka testified that he was aware that the children's bedroom locks were reversed so the locking mechanism was controlled from the outside of the bedroom and further expressed that he was not concerned with this point.**

57. Also, on cross-examination, David P. Pasulka stated that he had not spoken to SP, the parties' oldest boy that was being locked in his room, but he had spoken with the younger brother, MP, who confirmed that his older brother is allowed to come out of his bedroom to use the bathroom and to eat meals. David P. Pasulka stated that he was not aware that in his DCFS interview, SP stated that he was not allowed to leave his bedroom to use the bathroom and that he would urinate into a pencil box, and believed if that was said, SP said it to satisfy Aneta. These facts alleged above were confirmed on March 23, 2018, through the in court testimony of Northbrook Police Department Detective Ochab. A copy of Detective Ochab's March 23, 2018, testimony is attached and marked Plaintiff's Exhibit "C."

58. During the hearings, David P. Pasulka provided false and perjured testimony to favor Slobodan and throughout this case David P. Pasulka unlawfully spoke very badly about Aneta to the parties' three minor children. On February 16, 2018, Aneta's older son, SP, sent her messages explaining that David P. Pasulka was biased, spoke badly about Aneta and told SP what had supposedly happened and why SP was wrong. SP begged Aneta that he speaks to someone else to tell them the truth about what has happened. It must be noted that David P. Pasulka testified that he spoke with SP on the evening of February 15, 2018, while SP was with

Slobodan and not with Aneta, and that on February 16, 2018, while at school SP is sending relevant messages to Aneta about the visit with David P. Pasulka. It must be also noted that SP never saw nor talked to Aneta between SP's meeting with David P. Pasulka and SP messaging to Aneta. A copy of the SP's messages to Aneta are attached and marked Plaintiff's Exhibit "D."

59. Subsequent to the hearing, Associate Judge Johnson ordered Aneta and the children's schools not to interfere with Slobodan's ordered parenting time and immediately provided Slobodan with makeup parenting time.

60. On February 14, 2018, Slobodan filed a Petition for Rule to Show Cause against Aneta for interfering with his parenting time and even though any alleged contempt was already corrected by allowing Slobodan addition make-up parenting time, Aneta was ordered to respond within 21 days and a hearing was set for March 9, 2018.

61. On March 9, 2018, David P. Pasulka filed a report and provided testimony that based on his March 6, 2018, interview of the minor children, David P. Pasulka believed that Aneta was putting pressure on the three minor children to lie and to make false reports at school to interfere with Slobodan's parenting time. David P. Pasulka testified, "Each of the children told me a story about mom (Aneta) and that Aneta told the children that a judge put a 12-year old and an 8-year old in jail because of a visitation problem and because the children didn't want to go with dad." David P. Pasulka reported that SP told him the Aneta forced him to lie about Slobo(dan) and concluded and told Judge Johnson that in his opinion, "It would be better for the kids to take away Aneta's weekday visitation." A copy of David P. Pasulka's March 9, 2018 Report is attached and marked Plaintiff's Exhibit "E."

62. For March 23, 2018, hearing, Aneta provided to Associate Judge Johnson, two

letters that were written to the Judge by SP and that asked for help. The first letter was written on March 4, 2018, and explains that his father (Slobodan) yells, swears and screams at SP and that his father (Slobodan) puts pressure on him to lie when he speaks with DCFS. The second letter was written on March 17, 2018, after SP found and read David P. Pasulka's March 9, 2018, Report and in his letter SP states: "I read David's [David P. Pasulka] report. It is one of the best fairy tales ever (It's a lie after a lie)." SP also explains how his father (Slobodan) forces him to lie and tell David P. Pasulka that Aneta beats him. A copy of each letter is attached and marked Plaintiff's Exhibit "F."

63. Associate Judge Johnson refused Aneta's demand that Associate Judge Johnson interview the three minor children in chambers and further refused to allow Aneta's 12 year old, SP, to testify.

64. On March 9, 2018, it is believed that a "Rule to Show Cause" was issued against Aneta for interfering with Slobodan's parenting time and the "Rule to Show Cause was set for hearing on March 23, 2018." Aneta filed a response and on her witness list, Aneta listed the three minor children as witnesses.

65. On March 23, 2018, Associate Judge Johnson decided he was not going to hear evidence from the parties' older son, SP, 12 years old at the time, and, Associate Judge Johnson decided that he was not going to interview SP or the children in his chambers. Associate Judge Johnson granted Slobodan's Motion-in-Limine that asked to strike the three minor children from Aneta's Witness List and therefore refused to allow the three minor children to take any part in the hearing.

66. Also, Associate Judge Johnson refused to read and refused to consider in any way

Aneta's offer of proof that was presented and explained what the children would testify to as they had testified in their DCFS Advocate Interview and ignored SP's messages and letters to the judge.

67. Further, Associate Judge Johnson refused to continue the hearing and refused to compel the appearance of the two social workers from the minor children's school who were served a subpoena to appear and to testify on March 23, 2018, and who by letter, the School Board acknowledged receipt of the subpoenas but refused to produce the social workers unless compelled by Associate Judge Johnson to appear and to testify.

68. When Slobodan was unable to obtain possession of his minor children, local police were called. The police officer testified that two of the three children (SP and KP) refused to go with Slobodan and that the police officer refused to force those two children to go with Slobodan, but, since MP agreed to go with Slobodan, neither the police officer nor Aneta stopped MP from going with Slobodan.

69. On May 3, 2018, Associate Judge Johnson ruled and he found that Aneta was in Indirect Civil Contempt of Court for interfering with Slobodan's parenting time.

70. On May 29, 2018, Slobodan filed a Verified Emergency Petition for the Restriction of Aneta's Parenting Time with the Minor Children which was heard on June 8, 2018. Once again, Associate Judge Johnson denied Aneta's request to continue the hearing and once again Associate Judge Johnson provided Slobodan and David P. Pasulka immediate hearing dates.

71. Slobodan called David P. Pasulka as his witness. Aneta's objection based on failure to provide notice was overruled. David P. Pasulka testified falsely and provided an

opinion that Aneta's parenting time should be supervised.

72. On June 13, 2018, Associate Judge Johnson ruled and made all of Aneta's parenting time supervised. By this June 13, 2018, ruling, Aneta suffered severe damages from the loss of her parenting time that caused her to lose the companionship, love and affection of her three minor children and the three minor children lost their right to raised by their mother in a normal family home, a loving, stable and safe home environment.

73. Since June 13, 2018, Aneta has had no unsupervised time with her minor children and has had very little supervised parenting time with her three minor children as the six (6) separate supervisors have refused to continue with supervision due to being attacked by Slobodan and because when the three minor children appear for visitation their conduct is outrageous, disrespectful and aggressive and their statements are vulgar and threatening.

74. The three minor children make derogatory statements toward Aneta and they swear multiple times at Aneta and the supervisor and because many of the derogatory statements involve facts that occurred in court, the only way for the three minor children to know these facts is by being coached to make these statements by Slobodan.

75. The atrocious behavior of the three minor children has been reported to Associate Judge Johnson and Associate Judge Johnson has done nothing at all about it. It is believed that there is a conspiracy that was formed between Slobodan and David P. Pasulka and Associate Judge Johnson as on numerous occasions, prior to hearings or this case being called on status dates, David P. Pasulka and Associate Judge Johnson have walked into the courtroom together from the back room where Associate Judge Johnson's chambers were located and where unlawful extrajudicial and ex parte communications occurred.

76. In addition to the private ex parte communications between David P. Pasulka and Associate Judge Johnson, David P. Pasulka's testimony was unrealistic, unbelievable and clearly false. Furthermore, Associate Judge Johnson's giving immediate, short term court dates to Slobodan and far out three month dates to Aneta, in addition to rulings and blatant favoritism of Slobodan show proof of impropriety and just outrageous, unconstitutional, intentional bias. Also, DCFS's finding of unfounded against Slobodan was too quick and too suspect and believed to have been unlawfully influenced by David P. Pasulka.

77. The post-trial transcripts in this case provide overwhelming proof that Associate Judge Johnson used the auspices of his office as judge to aid and abet the civil conspiracy plan of David P. Pasulka and Slobodan and to assist them to alienate the minor children's love from their mother, Aneta, and to unlawfully punish Aneta by getting numerous orders of indirect civil contempt entered against Aneta and by taking Aneta's three minor children away from her forever.

78. The post-trial transcripts in this case provide overwhelming proof that David P. Pasulka used his position to influence Associate Judge Johnson and to aid and abet Slobodan's plan to alienate his minor children's love from their mother, Aneta, and to unlawfully punish Aneta by taking her minor children away from her forever.

79. The post-trial transcripts in this case provide overwhelming proof that this conspiracy that was formed and executed created a meeting of the minds between David P. Pasulka, Associate Judge Johnson and Slobodan, and caused the three minor children to lose the love, caring and affection of their loving mother, Aneta and caused the loss of Aneta's right to be a parent to her three minor children.

80. Throughout the post-trial matters in this case, Associate Judge Johnson acted without jurisdiction as the matter between Slobodan and Aneta was assigned to a different calendar and remained assigned to that calendar through the post-dissolution proceedings. Further, Associate Judge Johnson waived any and all privilege when he refused to comply with Cook County's re-assignment order that transferred this case to another Calendar as evidenced by the proof that each and every time that Aneta attempted to file a motion, the Cook County computer center would not allow the motion to be scheduled on Associate Judge Johnson's call as it was scheduled on another judge's calendar call.

81. David P. Pasulka waived any and all privilege by acting well beyond his authority that was granted in the December 18, 2017 order of court which assigned David P. Pasulka a limited capacity regarding the minor children's extracurricular activity with band and by committing perjury throughout the post-trial ter and David P. Pasulka succeeded in corrupting the state judicial process by participating in fraud and corruption and denying the Plaintiffs' Constitutional rights. Thus, David P. Pasulka cannot benefit from any form of immunity.

**COUNT I:
ASSOCIATE JUDGE ROBERT W. JOHNSON,
DAVID P. PASULKA and SLOBODAN M. PAVLOVICH
COMPLAINT FOR CIVIL RIGHTS CONSPIRACY
IN VIOLATION OF UNDER 42 U.S.C. §1983**

Plaintiff, ANETA HADZI-TANOVIC, individually and as natural mother and next friend for SP, MP and KP, all minors, complaining of Defendants, ASSOCIATE JUDGE ROBERT W. JOHNSON, DAVID P. PASULKA and SLOBODAN PAVLOVICH, states as follows:

82. Plaintiffs repeat, re-allege, and incorporate herein by reference each of the allegations set forth in paragraphs 1 through 81 as if set forth in full herein.

83. From the facts alleged above and the facts in the court transcripts, it is overwhelmingly clear that Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, reached an agreement or conspiracy between them to deprive Plaintiffs of their constitutional rights under color of law.

84. That From the facts alleged above and the facts in the court transcripts, it is overwhelmingly clear that Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, reached an agreement or conspiracy between them to act willfully in joint activity together with Defendant, Associate Judge Johnson, a state actor to deprive Plaintiffs of their constitutional rights under color of law.

85. Private actors, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, who “corruptly conspire” with state officials, Defendant, Associate Judge Johnson, to deprive individuals of federal rights act under color of state law within the meaning of § 1983 and thus liability under §1983 extends to private parties, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, involved in such conspiracies.

86. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, to improperly interfere with Aneta’s right to the companionship, love and affection of her three minor children on June 13, 2018, and thereafter.

87. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, to improperly interfere with Aneta’s fundamental rights and privileges to familial relations and to raise her three minor children which is secured by the Due Process Clause of the Fourteenth Amendment.

88. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, to improperly interfere with Aneta's fundamental rights and privileges to a fair and impartial trier of fact which is secured by the Due Process Clause of the Fourteenth Amendment.

89. Aneta has suffered a violation of her constitutionally protected rights and interests in the nurture, upbringing, companionship, care, and parenting time of her children generally protected by the Due Process Clause of the Fourteenth Amendment."

90. It is well known that parents have a constitutional right to the custody of (or parenting time with) their children, and any deprivation of that right must comply with the requirements of procedural due process. The three minor children have a protected liberty interest in being raised in a normal family home, a loving, stable and safe home environment.

91. By taking Aneta's children away from her through this unlawful conspiracy, Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, unlawfully violated Aneta's constitutional rights and the three minor children's constitutional rights mentioned above.

92. By taking Aneta's children away from her through this unlawful conspiracy, Aneta and her three minor children suffered severe physical and psychiatric injuries and were thus severely damaged.

93. The actions of Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, were willful and intentional and undermined Plaintiffs' constitutional rights to be a parent and to parent her three minor children and Plaintiffs right to a fair, unbiased and independent trier of fact.

94. Defendant, Associate Judge Johnson, Defendant, David P. Pasulka and Defendant, Slobodan M. Pavlovich, engaged in unconstitutional practices contravening 42 U.S.C. §1983.

95. Aneta and her three minor children have suffered injuries as a proximate result of the actions of Defendant, Associate Judge Johnson, Defendant, David P. Pasulka and Defendant, Slobodan M. Pavlovich, in contravention of 42 U.S.C. §1983.

WHEREFORE, Plaintiffs, ANETA HADZI-TANOVIC, and her three minor children, SP, MP and KP, respectfully requests that this Honorable Court enter judgment in Plaintiffs' favor and against Defendant, ASSOCIATE JUDGE JOHNSON, Defendant, DAVID P. PASULKA, and Defendant, SLOBODAN M. PAVLOVICH, award substantial compensatory damages for each Plaintiff in an amount in excess of \$1 Million, award substantial punitive damages in an amount in excess of \$1 Million and award a reasonable amount of attorney's fees pursuant to 42 U.S.C. §1988 and award costs and any other relief as the court deems just and proper.

**COUNT II:
ASSOCIATE JUDGE ROBERT W. JOHNSON,
DAVID P. PASULKA and SLOBODAN M. PAVLOVICH
COMPLAINT FOR CIVIL RIGHTS CONSPIRACY
IN VIOLATION OF 42 U.S.C. §1985 (3)**

Plaintiff, ANETA HADZI-TANOVIC, individually and as natural mother and next friend for SP, MP and KP, all minors, complaining of Defendants, ASSOCIATE JUDGE ROBERT W. JOHNSON, DAVID P. PASULKA and SLOBODAN M. PAVLOVICH, states as follows:

96. Plaintiffs repeat, re-allege, and incorporate herein by reference each of the allegations set forth in paragraphs 1 through 81 as if set forth in full herein.

97. This count is brought pursuant to 42 U.S.C. §1985 (3) that makes it unlawful for any person to deprive, either directly or indirectly, any person of the equal protection of the laws, or of equal privileges and immunities under the laws or to conspire against another person to

violate federally protected rights secured by the United States Constitution, and provides further that the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

98. From the facts alleged above and the facts in the court transcripts, it is overwhelmingly clear that Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, reached an agreement or conspiracy between them to deprive Plaintiffs of their constitutional rights under color of law.

99. That From the facts alleged above and the facts in the court transcripts, it is overwhelmingly clear that Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, reached an agreement or conspiracy between them and had a meeting of their minds to act willfully in joint activity together with Defendant, Associate Judge Johnson, a state actor to deprive Plaintiffs of their constitutional rights under color of law.

100. From the facts alleged above and the facts in the court transcripts, it is overwhelmingly clear that Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, reached an understanding between them and therefore engaged in a sequence of events or course of conduct and otherwise agreed and conspired together with overt acts and / or providing false testimony, to violate the constitutional rights of the Plaintiffs.

101. Each Defendant conspired with one another and did reach an understanding and agreement, and did engage in this course of conduct, and / or provided false testimony in court, with the mutual purpose, objective and knowledge that it would deprive Plaintiffs of their rights, privileges and immunities, as guaranteed by the Constitution and laws of the United States.

Defendants were acting in their individual capacities and under color of state law to commit overt acts and to violate Plaintiffs' constitutional rights.

102. Each Defendant conspired with one another, but, each Defendant could have stopped the other from violating 42 U.S.C. §1985 (3) against the Plaintiffs, but, each Defendant committed acts to further their conspiracy to deprive Plaintiffs of their constitutional rights mentioned above.

103. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, and / or provided false testimony in court, to improperly interfere with Aneta's right to the companionship, love and affection of her three minor children on June 13, 2018, and thereafter.

104. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, to improperly interfere with Aneta's fundamental rights and privileges to familial relations and to raise her three minor children which is secured by the Due Process Clause of the Fourteenth Amendment.

105. That Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, corruptly conspired with Defendant, Associate Judge Johnson, a state actor, and / or provided false testimony, to improperly interfere with Aneta's fundamental rights and privileges to a fair and impartial trier of fact which is secured by the Due Process Clause of the Fourteenth Amendment.

106. Aneta has suffered from the violation of her constitutionally protected rights and interests and has been denied the nurturing, upbringing, companionship, care, and parenting time of her children generally protected by the Due Process Clause of the Fourteenth Amendment.”

107. It is well known that parents have a constitutional right to the custody of (or parenting time with) their children, and any deprivation of that right must comply with the requirements of procedural due process. The three minor children have a protected liberty interest in being raised in a normal family home, a loving, stable and safe home environment.

108. By taking Aneta's children away from her through this unlawful conspiracy, Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, unlawfully violated Aneta's constitutional rights and the three minor children's constitutional rights mentioned above.

109. By taking Aneta's children away from her through this unlawful conspiracy, Aneta and her three minor children suffered severe physical and psychiatric injuries and were thus severely damaged.

110. The actions of Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, were willful and intentional and undermined Plaintiffs' constitutional rights to be a parent and to parent her three minor children and Plaintiffs right to a fair, unbiased and independent trier of fact.

111. Defendant, Associate Judge Johnson, Defendant, David P. Pasulka and Defendant, Slobodan M. Pavlovich, engaged in unconstitutional practices contravening 42 U.S.C. §1985 (3).

112. Aneta and her three minor children have suffered injuries as a proximate result of the actions of Defendant, Associate Judge Johnson, Defendant, David P. Pasulka, and Defendant, Slobodan M. Pavlovich, in contravention of 42 U.S.C. §1983.

WHEREFORE, Plaintiffs, ANETA HADZI-TANOVIC, and her three minor children,

SP, MP and KP, respectfully requests that this Honorable Court enter judgment in Plaintiffs' favor and against Defendant, ASSOCIATE JUDGE JOHNSON, Defendant, DAVID P. PASULKA, and Defendant, SLOBODAN M. PAVLOVICH, award substantial compensatory damages for each Plaintiff in an amount in excess of \$1 Million, award substantial punitive damages in an amount in excess of \$1 Million and award a reasonable amount of attorney's fees pursuant to 42 U.S.C. §1988 and award costs and any other relief as the court deems just and proper.

**COUNT III:
ASSOCIATE JUDGE ROBERT W. JOHNSON,
DAVID P. PASULKA and SLOBODAN M. PAVLOVICH
COMPLAINT FOR ABUSE OF PROCESS**

Plaintiff, ANETA HADZI-TANOVIC, individually and as natural mother and next friend for SP, MP and KP, all minors, complaining of Defendants, ASSOCIATE JUDGE ROBERT W. JOHNSON, DAVID P. PASULKA and SLOBODAN M. PAVLOVICH, states as follows:

113. Plaintiffs repeat, re-allege, and incorporate herein by reference each of the allegations set forth in paragraphs 1 through 81 as if set forth in full herein.

114. Defendants knew or upon reasonable investigation should have known that the providing false testimony through an unlawful conspiracy and by denying Plaintiffs' demand that Associate Judge Johnson interview the minor children would deny Plaintiffs' right to Due Process and would deny Plaintiffs' right to fair impartial trier of fact.

115. Defendants knew that the order entered on June 13, 2018, that limited and eventually eliminated Aneta's parenting time was achieved unlawfully through an unlawful conspiracy and the June 13, 2018 was not an order issued from a fair trier of fact, but, an unconstitutional, void or voidable order.

116. As a result of false testimony and malicious actions through Defendants' conspiracy, Aneta was compelled to become responsible to pay large sums of money and

attorney's fees to oppose the Defendants' unlawful acts and conspiracy. Aneta has also been hindered and prevented from establishing a reasonable parental relationship with her three minor children, has lost the love, affection and companionship of her three minor children and Aneta's three minor children have been deprived of receiving the love, affection and companionship of their mother.

117. Defendants' abuse of process was made with willful and wanton disregard for Plaintiffs' rights thereby entitling Plaintiffs to an award of punitive damages.

WHEREFORE, Plaintiffs, ANETA HADZI-TANOVIC, and her three minor children, SP, MP and KP, respectfully requests that this Honorable Court enter judgment in Plaintiffs' favor and against Defendant, ASSOCIATE JUDGE JOHNSON, Defendant, DAVID P. PASULKA, and Defendant, SLOBODAN M. PAVLOVICH, award substantial compensatory damages for each Plaintiff in an amount in excess of \$1 Million, award substantial punitive damages in an amount in excess of \$1 Million and award a reasonable amount of attorney's fees and costs and award costs and any other relief as the court deems just and proper.

**COUNT IV:
ASSOCIATE JUDGE ROBERT W. JOHNSON,
DAVID P. PASULKA and SLOBODAN M. PAVLOVICH
COMPLAINT FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

Plaintiff, ANETA HADZI-TANOVIC, individually and as natural mother and next friend for SP, MP and KP, all minors, complaining of Defendants, ASSOCIATE JUDGE ROBERT W. JOHNSON, DAVID P. PASULKA and SLOBODAN M. PAVLOVICH, states as follows:

118. Plaintiffs repeat, re-allege, and incorporate herein by reference each of the allegations set forth in paragraphs 1 through 81 as if set forth in full herein.

119. The conduct of the Defendants, Associate Judge Johnson, David P. Pasulka and Slobodan M. Pavlovich, was truly extreme and outrageous.

120. The Defendants, Associate Judge Johnson, David P. Pasulka and Slobodan M.

Pavlovich, knew that their misconduct and unlawful acts and conspiracy would cause and intended that their conduct inflict severe emotional distress on Aneta and did inflict severe emotional distress on the parties' three minor children. .

121. The unlawful acts and conspiracy was misconduct that did, in fact, cause severe emotional distress on the Plaintiffs.

WHEREFORE, Plaintiffs, ANETA HADZI-TANOVIC, and her three minor children, SP, MP and KP, respectfully requests that this Honorable Court enter judgment in Plaintiffs' favor and against Defendant, ASSOCIATE JUDGE JOHNSON, Defendant, DAVID P. PASULKA, and Defendant, SLOBODAN M. PAVLOVICH, award substantial compensatory damages for each Plaintiff in an amount in excess of \$1 Million, award substantial punitive damages in an amount in excess of \$1 Million and award a reasonable amount of attorney's fees and costs and award any other relief as the court deems just and proper.

Respectfully submitted,



Aneta Hadzi-Tanovic

Aneta Hadzi-Tanovic
Pro se
439 Sheryl Lane
Glenview, Illinois 60025
(773) 791-4069