

Stephen Sullivan

IN THE CIRCUIT COURT FOR THE SIXTEENTH JUDICIAL CIRCUIT
KANE COUNTY, ILLINOIS - LAW DIVISION

C.P., as Mother and Next Friend of S.P.,)
a minor,)
)
Plaintiff,)
)
v.)
LEE A. PALMER and BOUNTIFUL)
BLESSINGS MINISTRIES, an)
Illinois not-for-profit corporation,)
)
Defendants,)

No. 10 L 651

Stephen Sullivan
Clerk of the Circuit Court
Kane County, IL
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COMPLAINT AT LAW

NOW COMES the Plaintiff, C.P., as Mother and Next Friend of S.P., a minor, by and through her attorneys, WOODRUFF & JOHNSON, and for her complaint against the Defendants, LEE A. PALMER and BOUNTIFUL BLESSINGS MINISTRIES, an Illinois not-for-profit corporation, states as follows:

COUNT I: SEXUAL ABUSE OF A MINOR (BATTERY) BY LEE A. PALMER

1. That C.P. is the mother of S.P., a minor.
2. That the Plaintiff, S. P., is a minor who was born on September 27, 1997.
3. That at all times relevant herein, the minor Plaintiff, S. P., was under the age of twelve (12).
4. That at all times relevant herein, C.P. and S.P. were members of BOUNTIFUL BLESSINGS MINISTRIES, a church in Aurora, Illinois.
5. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, is a Christian, non-denominational church which was incorporated on January 25, 1989.

NOTICE
BY ORDER OF COURT THIS CASE IS HEREBY
SET FOR CASE MANAGEMENT CONFERENCE
BEFORE THE ABOVE NAMED JUDGE
ON 1-24-11
AT 9 A.M., P.M.
FAILURE TO APPEAR MAY RESULT IN THE
CASE BEING DISMISSED OR AN ORDER OF
DEFAULT BEING ENTERED.

6. That the owner of the Defendant, BOUNTIFUL BLESSINS MINISTRIES, is Mae L. Palmer.
7. That the Defendant, LEE A. PALMER, is the husband of Mae L. Palmer, owner of the Defendant, BOUNTIFUL BLESSINGS MINISTRIES.
8. That at all times relevant herein, the Defendant, LEE A. PALMER, was employed as a clergyman and/or pastor of the Defendant, BOUNFIUL BLESSINGS MINISTRIES.
9. That at all times relevant herein, the Defendant, LEE A. PALMER, was acting within the scope of his employment as a clergyman and pastor with the Defendant, BOUNTIFUL BLESSING MINISTRIES.
10. That at all times relevant herein, the Defendant, LEE A. PALMER, was acting as the duly-authorized agent, servant, and/or employee of the Defendant, BOUNTIFUL BLESSING MINISTRIES.
11. That from approximately June 2006 through and until approximately September 2008, the Defendant, LEE A. PALMER, committed numerous sexual acts upon the minor Plaintiff, S. P.
12. That the sexual acts committed by the Defendant, LEE A. PALMER, upon the minor Plaintiff, S.P., took place when the minor Plaintiff, S.P. was between the ages of nine (9) and eleven (11) years old.
13. That numerous acts of sexual assault committed by the Defendant, LEE A. PALMER referenced herein occurred on or in property owned by the Defendant, BOUNTIFUL BLESSING MINISTRIES.
14. That the Defendant, LEE A. PALMER, committed sexual acts upon the minor Plaintiff, S.P., at the church owned by the Defendant, BOUNTIFUL BLESSING

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MINISTRIES, located at 15 S. East Avenue, in the City of Aurora, County of Kane, State of Illinois.

15. That the Defendant, LEE A. PALMER, committed sexual acts upon the minor Plaintiff, S.P., at a food pantry owned by the Defendant, BOUNTIFUL BLESSING MINISTRIES, located at 901 East Galena, in the City of Aurora, County of Kane, State of Illinois.

16. That the Defendant, LEE A. PALMER, committed sexual acts upon the minor Plaintiff, S.P., in a van owned by the Defendant, BOUNTIFUL BLESSING MINISTRIES.

17. That the sexual acts committed by LEE A. PALMER were unwanted sexual acts perpetrated upon the minor Plaintiff, S.P.

18. That as a direct and proximate result of the aforesaid sexual abuse committed by the Defendant, LEE A. PALMER, upon the minor Plaintiff, S.P., the minor Plaintiff, S.P., was injured both temporarily and permanently, her mother, C.P., has expended and will continue to expend sums of money in an effort to cure S.P. of her injuries, she has suffered and will continue to suffer great pain and discomfort as a result of her injuries, and she has lost and will continue to lose gains she otherwise would have realized, but for said injuries.

WHEREFORE, the Plaintiff, C.P., as mother and next friend of S.P., a minor, demands judgment against the Defendant, LEE A. PALMER, individually, for a sum in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II: NEGLIGENCE BY LEE A. PALMER

1. The Plaintiff, C.P., as Parent and Next Friend of S.P., a minor, repeats and alleges each and every allegation contained in paragraphs 1 through 17 of Count I as paragraphs 1 through 17 of Count II.

18. That the Defendant, LEE A. PALMER, as a clergyman and pastor of BOUNTIFUL BLESSINGS MINISTRIES, had duties which included, but were not limited to, guiding young people on their spiritual paths, supervising individuals in their quest for religious and spiritual understanding, teaching people to act in a manner consistent with the moral and teachings of BOUNTIFUL BLESSINGS MINISTRIES, and the Christian faith, supervising children in their activities with the church, and other acts and duties consistent with his role as a clergyman and pastor of the church.

19. That while performing his duties at BOUNTIFUL BLESSINGS MINISTRIES, the Defendant, LEE A. PALMER, was expected to carry out the aforesaid duties in a manner consistent with the teachings and professions of BOUNTIFUL BLESSINGS MINISTRIES and Christian faith, and, as such, was bound by a duty to act in a manner consistent with these roles.

20. That the Defendant, LEE A. PALMER, engaged in extramarital affairs with several women prior to 2006 while he was married to MAE PALMER.

21. That prior to 2006, the Defendant, LEE A. PALMER, fathered at least three (3) children with two (2) of the women he engaged in extramarital affairs with.

22. That while acting in these roles, the Defendant, LEE A. PALMER, perpetrated the acts of abuse more fully alleged above, utilizing his position as a clergyman and pastor of

BOUNTIFUL BLESSINGS MINISTRIES to gain the trust and confidence of his followers, including the minor Plaintiff, S.P.

23. That during the aforementioned period, the Defendant, LEE A. PALMER, negligently and carelessly failed to exercise reasonable care in the training, supervision, mentoring, and guidance of his church members, including S.P., in the following breaches of duty:

- a. By using his position as a moral and spiritual leader in order to gain the trust of his church members, including S.P., in order to posture his sexual advances in a non-dangerous way;
- b. By using his position as a moral and spiritual leader in order to perpetrate the unwanted sexual contact more fully referenced above; and
- c. By manipulating the emotions and spiritual trust of his followers, including S.P., thereby creating an aura of religious, spiritual, and personal confusion on the part of S.P.

24. That as a direct and proximate result of the aforesaid sexual abuse committed by the Defendant, LEE A. PALMER, upon the minor Plaintiff, S.P., the minor Plaintiff, S.P., was injured both temporarily and permanently, her mother, C.P., has expended and will continue to expend sums of money in an effort to cure S.P. of her injuries, she has suffered and will continue to suffer great pain and discomfort as a result of her injuries, and she has lost and will continue to lose gains she otherwise would have realized, but for said injuries.

WHEREFORE, the Plaintiff, C.P., as mother and next friend of S.P., a minor, demands judgment against the Defendant, LEE A. PALMER, individually, for a sum in excess of Fifty Thousand Dollars (\$50,000.00).

**COUNT III - NEGLIGENT HIRING BY BOUNTIFUL BLESSINGS
MINISTRIES**

1. The Plaintiff, C.P., as Parent and Next Friend of S.P., a minor, repeats and re-alleges each and every allegation contained in paragraphs 1 through 23 of Count II as paragraphs 1 through 23 of Count III.

23. That at all times relevant hereto, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, was a Christian, non-denominational church and had its offices in and did its religious and spiritual work in the City of Aurora, County of Kane, State of Illinois.

24. That between 2006 and 2008, the Defendant, LEE A. PALMER, was under the management and control of the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, by and through its agents, servants, and/or employees.

25. That between 2006 and 2008, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, by and through its duly-authorized agents, servants, and/or employees, monitored, supervised, hired, trained, counseled, employed, and otherwise exercised control over the activities of the Defendant, LEE A. PALMER.

26. That the Defendant, LEE A. PALMER, had been hired and/or allowed to act as a clergyman and pastor of BOUNTIFUL BLESSINGS MINISTRIES. Further, that in such role, the Defendant, LEE A. PALMER, was to act as a spiritual, religious, moral leader, and caretaker of children who attended BOUNTIFUL BLESSINGS MINISTRIES, whose duties included, but were not limited to, guiding young people on their spiritual paths, supervising individuals in their quest for religious and spiritual understanding, teaching people to act in a manner consistent with the morals and teachings of BOUNTIFUL BLESSINGS MINISTRIES and the Christian faith, and other acts and duties consistent with his role as a clergyman and pastor of the church.

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27. That each of the Defendants were, at all times relevant hereto, the agent, servant, employee, partner, associate, joint venturer, co-participant, and/or principal of or with each of the other remaining Defendants. Further, that at all times relevant hereto, each Defendant was acting within the scope of such relationship with the full knowledge, authority, and permission of each of the remaining Defendants.

28. That from 2006 to 2008, the minor Plaintiff, S.P., was sexually molested by the Defendant, LEE A. PALMER.

29. That all of the sexual acts committed against the minor Plaintiff, S.P., by the Defendant, LEE A. PALMER, were within the scope of his relationship with the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, in that they occurred or were made possible by the relationship between the two.

30. That the sexual molestations referenced above constituted a breach of duty owed to the minor Plaintiff, S.P., by the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, in hiring the Defendant, LEE A. PALMER, thereby providing the opportunity for these sexual molestations to occur to the minor Plaintiff, S.P.

31. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, with all that it stood for, implied that the Defendant, LEE A. PALMER, was a safe caretaker, morally and spiritually beneficial, and would not pose a risk to the children associated with BOUNTIFUL BLESSINGS MINISTRIES.

32. That at no time between 2006 and 2008 did the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, have in place a system or procedure to supervise and/or monitor clergyman and/or pastors and their pre-sexual grooming of children in order to prevent or lessen the risk of sexual assaults occurring to minors, and did not employ

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reasonably sufficient procedures for testing and screening potential clergyman and/or pastors for dangerous sexual tendencies, such as those shown by the Defendant, LEE A. PALMER. As a direct result of this, the Defendants made the youth members of BOUNTIFUL BLESSINGS MINISTRIES accessible and vulnerable to acts of pre-sexual grooming, all of which were accomplished in the scope of employment or agency of the Defendants.

33. That at all times relevant hereto, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, was under and imposed duty to do background checks on individuals that it was employing on its staff.

34. That notwithstanding this duty, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, failed to perform said background check on the Defendant, LEE A. PALMER.

35. That if the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, had in place a system or procedure to test and screen potential clergyman and/or pastors for dangerous sexual tendencies, it would have discovered, prior to 2006, that the Defendant, LEE A. PALMER, posed a significant risk to the youth involved and should not have been entrusted with the safety of minor children. Further, that it would have been foreseeable, or should have been foreseeable, that the Defendant, LEE A. PALMER, would engage in sexually predatory activities with the minor Plaintiff, S.P., and/or other minor children involved with BOUNTIFUL BLESSINGS MINISTRIES.

36. That alternatively, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, knew that the Defendant, LEE A. PALMER, posed a significant risk to the youth involved and should not have been entrusted with the safety of minor children. Further, it

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should have been foreseeable, that the Defendant, LEE A. PALMER, would engage in sexually predatory activities with the minor Plaintiff, S.P., and/or other minor children involved with BOUNTIFUL BLESSINGS MINISITRIES.

37. That if the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, had in place a system or procedure to test and screen potential clergyman and/or pastors for dangerous sexual tendencies, it would have discovered that, prior to 2006, the Defendant, LEE A. PALMER, had extramarital sexual relations with several other women and had three (3) children with at least two (2) of these women during the time in which he was married to his wife, MAE PALMER, but hired and retained him as the clergyman and/or pastor of the church in spite of this knowledge.

38. That, alternatively, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, knew that the Defendant, LEE A. PALMER, had extramarital sexual relations with several other women and had three (3) children with at least two (2) of these women during the time in which he was married to his wife, MAE PALMER.

39. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, knew of the dangerous sexual tendencies of the Defendant, LEE A. PALMER, when it hired him.

40. That the injuries suffered by the minor Plaintiff, S.P., were proximately caused by the negligent hiring of the Defendant, LEE A. PALMER. Further, that but for these negligent acts, the minor Plaintiff, S.P., would not have been subjected to the abused suffered at the hands of the Defendant, LEE A. PALMER.

41. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, was aware, or should have been aware, of the dangerous sexual propensities of the Defendant, LEE A. PALMER.

42. That despite this knowledge, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, hired the Defendant, LEE A. PALMER, to serve as a clergyman and/or pastor of its church.

43. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, had been warned through various activities that the Defendant, LEE A. PALMER, posed a threat to youth of the church, including, but not limited to, verbal warnings from other members of the church and parents of other children.

44. That the Defendant, LEE A. PALMER, possessed certain dangerous characteristics that made members of BOUNTIFUL BLESSINGS MINISTRIES, particularly minor children, vulnerable to harm and injury, in that he possessed dangerous sexual propensities, including, but not limited to, pedophilia.

45. That as a direct and proximate result of the aforesaid conduct of the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, the minor Plaintiff, S.P., was injured both temporarily and permanently, her mother, C.P., has expended and will continue to expend sums of money in an effort to cure S.P. of her injuries, she has suffered and will continue to suffer great pain and discomfort as a result of her injuries, and she has lost and will continue to lose gains she otherwise would have realized, but for said injuries.

WHEREFORE, the Plaintiff, C.P., as mother and next friend of S.P., a minor, demands judgment against the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, for a sum in excess of Fifty Thousand Dollars (\$50,000.00).

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COUNT IV – NEGLIGENT RETENTION/SUPERVISION BY BOUNTIFUL BLESSINGS MINISTRIES

1. The Plaintiff, C.P., as Parent and Next Friend of S.P., a minor, repeats and re-alleges each and every allegation contained in paragraphs 1 through 23 of Count II as paragraphs 1 through 23 of Count IV.

23. That at all times relevant hereto, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, was a Christian, non-denominational church and had its offices in and did its religious and spiritual work in the City of Aurora, County of Kane, State of Illinois.

24. That between 2006 and 2008, the Defendant, LEE A. PALMER, was under the management and control of the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, by and through its agents, servants, and/or employees.

25. That between 2006 and 2008, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, by and through its duly-authorized agents, servants, and/or employees, monitored, supervised, hired, trained, counseled, employed, and otherwise exercised control over the activities of the Defendant, LEE A. PALMER.

26. That the Defendant, LEE A. PALMER, had been retained and supervised as a clergyman and pastor of BOUNTIFUL BLESSINGS MINISTRIES. Further, that in such role, the Defendant, LEE A. PALMER, was to act as a spiritual, religious, moral leader, and caretaker of children who attended BOUNTIFUL BLESSINGS MINISTRIES, whose duties included, but were not limited to, guiding young people on their spiritual paths, supervising individuals in their quest for religious and spiritual understanding, teaching people to act in a manner consistent with the morals and teachings of BOUNTIFUL BLESSINGS MINISTRIES and the Christian faith, and other acts and duties consistent with his role as a clergyman and pastor of the church.

27. That as a result of Defendant BOUNTIFUL BLESSINGS MINISTRIES' supervision and retention of the Defendant, LEE A. PALMER, BOUNTIFUL BLESSINGS MINISTRIES was aware of LEE A. PALMER's sexually predatory tendencies and the risks he posed to the youth of BOUNTIFUL BLESSINGS MINISTRIES. Further, that BOUNTIFUL BLESSINGS MINISTRIES was aware, at the time, that LEE A. PALMER was unfit for the position which he held, and that he was unfit to perform his duties consistent with the roles that accompanied this position.

28. That each of the Defendants were, at all times relevant hereto, the agent, servant, employee, partner, associate, joint venturer, co-participant, and/or principal of or with each of the other remaining Defendants. Further, that at all times relevant hereto, each Defendant was acting within the scope of such relationship with the full knowledge, authority, and permission of each of the remaining Defendants.

29. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, had been warned through various activities that the Defendant, LEE A. PALMER, posed a threat to youth of the church, including, but not limited to, verbal warnings from other members of the church and parents of other children.

30. That from 2006 to 2008, the minor Plaintiff, S.P., was sexually molested by the Defendant, LEE A. PALMER.

31. That all of the sexual acts committed against the minor Plaintiff, S.P., by the Defendant, LEE A. PALMER, were within the scope of his relationship with the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, in that they occurred or were made possible by the relationship between the two.

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32. That the sexual molestations referenced above constituted a breach of duty owed to the minor Plaintiff, S.P., by the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, in supervising and retaining the Defendant, LEE A. PALMER, thereby providing the opportunity for these sexual molestations to occur to the minor Plaintiff, S.P.

33. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, with all that it stood for, implied that the Defendant, LEE A. PALMER, was a safe caretaker, morally and spiritually beneficial, and would not pose a risk to the children associated with BOUNTIFUL BLESSINGS MINISTRIES.

34. That at no time between 2006 and 2008 did the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, have in place a system or procedure to supervise and/or monitor clergyman and/or pastors and their pre-sexual grooming of children in order to prevent or lessen the risk of sexual assaults occurring to minors, and did not employ reasonably sufficient procedures for testing and screening potential clergyman and/or pastors for dangerous sexual tendencies, such as those shown by the Defendant, LEE A. PALMER. As a direct result of this, the Defendants made the youth members of BOUNTIFUL BLESSINGS MINISTRIES accessible and vulnerable to acts of pre-sexual grooming, all of which were accomplished in the scope of employment or agency of the Defendants.

35. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, by and through its duly-authorized agents, servants, and/or employees, had knowledge that, prior to 2006, the Defendant, LEE A. PALMER, had extramarital sexual relations with several other women and had at least three (3) children with two (2) of these women while he was

married to his wife, MAE PALMER, but hired and retained him as the clergyman and/or pastor of the church in spite of this knowledge.

36. That armed with the knowledge of the extramarital sexual relations and fathering of other children by the Defendant, LEE A. PALMER, the Defendant, BOUNTIFUL BLESSING MINISTRIES, should have closely-monitored and supervised his relations with children in his duties as a clergyman and/or pastor.

37. That the injuries suffered by the minor Plaintiff, S.P., were proximately caused by the negligent supervision and retention of the Defendant, LEE A. PALMER. Further, that but for these negligent acts, the minor Plaintiff, S.P., would not have been subjected to the abused suffered at the hands of the Defendant, LEE A. PALMER.

38. That the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, was aware, or should have been aware, of the dangerous sexual propensities of the Defendant, LEE A. PALMER.

39. That despite this knowledge, the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, retained the Defendant, LEE A. PALMER, in his position as a clergyman and/or pastor of its church.

40. That the Defendant, LEE A. PALMER, possessed certain dangerous characteristics that made members of BOUNTIFUL BLESSINGS MINISTRIES, particularly minor children, vulnerable to harm and injury, in that he possessed dangerous sexual propensities, including, but not limited to, pedophilia.

41. That as a direct and proximate result of the aforesaid conduct of the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, the minor Plaintiff, S.P., was injured both temporarily and permanently, her mother, C.P., has expended and will continue to expend

sums of money in an effort to cure S.P. of her injuries, she has suffered and will continue to suffer great pain and discomfort as a result of her injuries, and she has lost and will continue to lose gains she otherwise would have realized, but for said injuries.

WHEREFORE, the Plaintiff, C.P., as mother and next friend of S.P., a minor, demands judgment against the Defendant, BOUNTIFUL BLESSINGS MINISTRIES, for a sum in excess of Fifty Thousand Dollars (\$50,000.00).

Respectfully submitted,



Mario C. Palermo

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