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2005

Complaint, Bloch vs. Frischholz, Docket No.  
1:05-cv-05379 (Northern District of Illinois Sept  
16, 2005)

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**FILED** *KL*  
**SEPTEMBER 16, 2005**  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**FILED**

SEP 16 2005

**MICHAEL W. DOBBINS**  
**CLERK, U.S. DISTRICT COURT**

United States District Court  
For The Northern District Of Illinois,  
Eastern Division

Lynne Bloch, Helen Bloch, and	)
Nathan Bloch,	)
	)
Plaintiffs,	)
	)
vs.	)
	)
Edward Frischholtz	)
	)
Shoreline Towers Condominium	)
Association, an Illinois not-for-profit	)
corporation,	)
	)
Defendants,	)

No. **05C 5379**

Judge \_\_\_\_\_

Magistrate **JUDGE COAR** \_\_\_\_\_

**MAGISTRATE JUDGE DENLOW**

**Complaints**

The Plaintiff's Lynne Bloch, Helen Bloch, and Nathan Bloch, by their attorneys F. Willis Caruso, Lewis W. Powell, III and the Senior Law Students of The John Marshall Law School Fair Housing Legal Clinic, and complain of Defendants Edward Frischholz, and the Shoreline Towers Condominium Association an Illinois not-for-profit corporation; as follows:

**I. Jurisdiction**

1. This action arises under 42 U.S.C. §1982, 42 U.S.C. §3601 et seq.; the Illinois Constitution Article 1, §3 and §4; and The Illinois Condominium Act 765 ILCS 605/1 §§18.4B.
2. Jurisdiction is conferred on this Court by 28 U.S.C. §1331, §1343(a) and §2201, and 42 U.S.C. §3613(a).
3. Venue is proper in the Northern District of Illinois, Eastern Division since

Plaintiff and Defendants reside within the boundaries thereof.

## **II. Parties**

### **A. Plaintiffs:**

4. Plaintiff Lynne Bloch is a Jewish American citizen who is the owner of and resides at 6301 North Sheridan Road units 12R, 12K, and 12L, Chicago, Illinois 60660. (Sometimes referred to herein as the "Subject Property") Lynne Bloch is mother of Plaintiffs Helen Bloch and Nathan Bloch.

5. Plaintiff Helen Bloch is a Jewish American citizen who formerly resided at 6301 North Sheridan Road units 12R, 12K, and 12L, Chicago Illinois 60660. Plaintiff Helen Bloch is the daughter of Plaintiff Lynne Bloch, and sister of Plaintiff Nathan Bloch.

6. Plaintiff Nathan Bloch is a Jewish American citizen who resides at 6301 North Sheridan Road units 12R, 12K, and 12L, Chicago, Illinois 60660. Plaintiff Nathan Bloch is the son of Plaintiff Lynne Bloch, and brother of Plaintiff Helen Bloch.

### **B. Defendants:**

7. Defendant Edward Frischholz at all times relevant hereto resided at 6301 North Sheridan Road and is made a party to this action for his individual acts. He continues to be the President of the Shoreline Towers' Board of Directors and acts for and on behalf of the Association.

8. Defendant Shoreline Towers Association is a not-for-profit corporation of Illinois and a condominium association located at 6301 North Sheridan Road Chicago, IL 60660.

## **III. Statement of Facts**

9. Commencing during or about May 2004 and continuing to the date hereof

Defendants Edward Frischholz, and the Shoreline Towers Condominium Association; intimidated, threatened, and interfered with the Blochs by consistently removing and prohibiting the Blochs from placing a Mezuzah (a religious parchment encased in a small tube essential to observing Jewish Religion) on the exterior of the Subject Property doorway.

10. Commencing during or about June 2004 and continuing to the date hereof, Defendants continued and continue to prevent the Blochs from placing a Mezuzah on the exterior of the Subject Property doorway, despite Jewish law requiring that Mezuzot be placed on the outside of the door of Jewish residences.

11. Commencing during or about May 2004, Defendants ordered the Mezuzah on the Subject Property to be removed to facilitate the repainting of the condominium hallway. The hallway painting was completed by approximately June 2004, after which Plaintiffs placed the Mezuzah back on their door.

12. On information and belief Defendants ordered or directed the building maintenance staff or others to remove the Mezuzah from the door of the Subject Property. The Mezuzah on the subject property was removed by or on behalf or at the direction and order of the Defendants three times before the death of Mr. Bloch. The Bloch family was informed by or for and on behalf of Defendants that if the Mezuzah was put up the Blochs would be fined by the Condominium Association.

13. Contemporaneously, Defendants claimed that they were enforcing a by-law which purportedly prohibited anything from being placed on a doorpost in the hallway of the Condominium. The claimed provision of by-law and the purported interpretation given by Defendants had not previously been so interpreted or enforced in the manner

employed by Defendants, despite having been added in the year 2001.

14. Commencing during or about May 2004, and continuing to the date hereof, Defendants began to remove and prohibit the Blochs from replacing the Mezuzah on the exterior doorway of the Subject Property, during the Blochs' Shiva (a seven-day period of formal mourning created by Jewish law and observed after the funeral of a close relative) for the passing of Plaintiff Lynne Bloch's husband and Plaintiffs Nathan and Helen Bloch's father.

15. On June 7, 2005, the Defendants removed or caused to be removed the Mezuzah on the Subject Property while the Blochs were at the funeral of their husband and father. This caused the Blochs great anguish and embarrassment when a Jewish Rabbi who made a Shiva call (the term used when someone attends of a Shiva) put up his hand toward where the Mezuzah should have been and noticed it was not on the door. The Blochs, much to their embarrassment, had to explain why they were in violation of Jewish law.

16. Commencing during or about June 2004, and continuing to the date hereof, Defendants continued to remove the Mezuzah and to prohibit the Blochs from placing the Mezuzah back on the doorway despite being advised there was a written agreement between Shoreline Towers and the Blochs allowing the Blochs to keep the Mezuzah on the doorway for the seven days of the mourning period.

17. Such actions deprived the Blochs of the use and enjoyment of their home by infringing on their right to freely practice their religious faith. These actions were based on the Blochs' status as members of the Jewish religion and race.

18. In the past two years, Defendant Edward Frischholz has insulted and harassed Lynne Bloch. Defendant Edward Frischholz published a letter alleging and stated various

false allegations including that Lynne Bloch is allegedly a racist, and encouraging other tenants to try to keep her off of the Board of Directors in the future.

19. On or about September 1, 2005, Defendants held a special meeting and would not allow Lynne Bloch, a duly elected board member, to attend the meeting. Defendants have prevented Lynne Bloch from fully participating as a member of the Board of Directors.

20. As a direct consequence of Defendants' discriminatory, retaliatory, and harassing actions, Plaintiffs continue to suffer emotional distress and mental anguish.

21. All of the actions of Defendants complained of herein were done willfully, maliciously with disregard for the rights of the Plaintiffs.

#### **IV. Claims for Relief**

##### **Claims Against Defendant Edward Frischholz**

##### **Count 1**

##### **Religious Discrimination Under 42 U.S.C. §3604**

22. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

23. The actions by Defendant are in violation of the Blochs' housing rights by discriminating in the provision of services or facilities and to make the housing otherwise unavailable in connection with the sale or rental of a dwelling based upon the Blochs' Jewish religion and race constitutes discrimination on the basis of race and religion in violation of the Fair Housing Act 42 U.S.C. §3604 (a) and (b).

24. The Blochs have sustained direct injuries including, but not limited to, being

barred from the full use and enjoyment of Subject Property, as guaranteed by the Fair Housing Act, and the emotional and mental anguish sustained as a result of Defendant's discriminatory actions of prohibiting and removing the Mezuzah from placement on the exterior doorpost of the Subject Property.

25. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Plaintiffs' residence and prohibiting the Defendant Edward Frichhoz from preventing the Mezuzah from being placed on the doorpost of the Subject Property and/or removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages of actions done with malice or careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

### **Count 2**

#### Violation of 42 U.S.C. §3617

26. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

27. The actions by Defendant of intimidating, interfering with the housing rights of, and harassing the Blochs by prohibiting the Mezuzah from being placed on the exterior doorpost, spitting in the face of Ms. Lynne Bloch, and circulating a defamatory letter about the Blochs is interference and intimidation discrimination on the basis of race and religion in violation of the Fair Housing Act, 42 U.S.C. §3617.

28. The Blochs have sustained and continue to sustain direct injuries including, but not limited to, being barred from the full use and enjoyment of the Subject Property, as guaranteed by the Fair Housing Act, as well as emotional and mental anguish, embarrassment, and intimidation sustained as a result of Defendant's discriminatory actions of prohibiting the Mezuzah from placement on the exterior doorpost of the Subject Property.

29. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendant from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or in careless disregard for the rights of Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

### **Count 3**

#### Violation of 42 U.S.C. §1982

30. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

31. The actions by the Defendant of prohibiting the Blochs from placing a Mezuzah on the exterior doorway of the Subject Property, being because of race, is a violation of the Blochs' right of contract in violation of 42 U.S.C. §1982.

32. The actions by the Defendant of removing a Mezuzah on the exterior doorway of



the Subject Property, being because of race, are a violation of the Blochs' right to have the same rights as enjoyed by other citizens to hold and convey real and personal property in violation of 42 U.S.C §1982.

33. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and cost and such other relief as the court shall deem just and proper.

#### **Count 4**

##### **Violation of the Illinois Constitution Article 1, §3 and §4**

34. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

35. The actions by the Defendant of prohibiting the Plaintiffs from placing the Mezuzah on the exterior doorpost of the Subject Property is a violation of Plaintiffs' right to free exercise and enjoyment of religion and worship without discrimination, in violation of Article 1, §3 of the Illinois Constitution.

36. The actions by the Defendant of prohibiting the Blochs' freedom of speech by prohibiting Plaintiffs from placing a Mezuzah on the Plaintiff's doorways is a violation of Article 1, §4 of the Illinois Constitution.

37. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendant from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

#### **Count 5**

#### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

38. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

39. Defendant's repeated acts of removing the Mezuzah in disruption of the Bloch's period of mourning, without honoring the agreement to allow the Mezuzah to be placed on the exterior doorpost of the Subject Property, and circulating a defamatory letter amount to extreme and outrageous conduct.

40. The Defendant's conduct was intentional and outrageous.

41. The Defendant's intentional conduct caused the Blochs to suffer severe emotional distress, and mental anguish.

42. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendant from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property

and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the Subject Property and from circulating defamatory material. That the court award damages for the injury to the Plaintiffs including actual damages for mental anguish, humiliation and embarrassment, punitive damages and attorney's fees and costs and such other relief as the court shall deem just and proper.

### **Count 6**

#### **DEFAMATION IN THE FORM OF LIBEL AND SLANDER**

43. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

44. The actions of Defendant Edward Frischholz of publishing knowingly false statements about the Blochs and distributing the published materials constitute defamation in the form of libel and slander.

45. The actions of Defendant Edward Frischholz of stating knowingly false statements about the Blochs to third parties constitute defamation in the form of slander.

46. The Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendant from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the Subject Property and from distributing, publishing, circulating, or stating false and/or defamatory matter or material. That the court award damages for the injury to the Plaintiffs including actual damages for mental anguish, humiliation and embarrassment, punitive damages and attorney's fees and costs and such other relief as the court shall deem just and proper.

**Claims Against**

**Defendant Shoreline Towers Condominium Association**

**Count 7**

**Religious Discrimination Under 42 U.S.C. §3604**

47. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

48. The actions by Defendant in violation of the Blochs' housing rights in the provision of services or facilities in connection with the sale or rental of a dwelling based upon the Blochs' Jewish religion and race constitutes discrimination on the basis of race and religion in violation of the Fair Housing Act 42 U.S.C. §3604 (a) and (b).

49. The Blochs have sustained direct injuries including, but not limited to, being barred from the full use and enjoyment of the Subject Property, as guaranteed by the Fair Housing Act, and the emotional and mental anguish sustained as a result of Defendant's discriminatory actions of prohibiting and removing the Mezuzah from placement on the exterior doorpost of the Subject Property.

50. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendant from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or careless disregard for the rights of the

Plaintiffs, attorney's fees costs and such other relief as the court shall deem just and proper.

**Count 8**

Violation of 42 U.S.C. §3617

51. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

52. The actions by Defendant of intimidating, interfering with the housing rights of, and harassing the Blochs by prohibiting the Mezuzah from being placed on the exterior doorpost, is discrimination on the basis of race and religion in violation of the Fair Housing Act, 42 U.S.C. §3617.

53. The Blochs have sustained and continue to sustain direct injuries including, but not limited to, being barred from the full use and enjoyment of the Subject Property as guaranteed by the Fair Housing Act as well as emotional and mental anguish sustained as a result of Defendant's discriminatory actions of prohibiting the Mezuzah from placement on the exterior doorpost of the Subject Property.

54. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, Punitive damages for actions done withmalice or in careless disregard for the rights of

Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

**Count 9**

Violation of 42 U.S.C. §1982

55. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

56. The actions by the Defendant of prohibiting the Blochs from placing a Mezuzah on the exterior doorway of the Subject Property, being because of race, are a violation of the Bloch's right to be protected against impairment of their rights as enjoyed by others in violation of 42 U.S.C. §1982.

57. The actions by the Defendant of in removing a Mezuzah from the exterior doorway of the Subject Property, being because of race, are a violation of the Blochs' right to have the same rights as enjoyed by white citizens to hold and convey real and personal property in violation of 42 U.S.C §1982.

58. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

**Count 10**

Violation of the Illinois Constitution Article 1, §3 and §4

59. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

60. The actions by the Defendant of prohibiting the Plaintiffs from placing the Mezuzah on their exterior doorpost is a violation of Plaintiffs' right to free exercise and enjoyment of religious profession and worship without discrimination, in violation of Article 1, §3 of the Illinois Constitution.

61. The actions by the Defendant of prohibiting the Blochs' freedom of speech by prohibiting Plaintiffs from placing a Mezuzah on the Plaintiff's doorways is a violation of Article 1, §4 of the Illinois Constitution.

62. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Plaintiffs' residence and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the residence. That the court award damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, attorney's fees and such other relief as the court shall deem just and proper.

**Count 11**

Violation of Illinois Condominium Act §18.4:

Powers and Duties of Managers

63. The Blochs restate and re-allege paragraph 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

64. Defendant violated The Illinois Condominium Act §§18.4: Powers and Duties of Managers by enforcing rules and regulations that impair Plaintiffs' rights by preventing Plaintiffs from freely exercising their religion and free speech.

65. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damage for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

### **Count 12**

#### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

66. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

67. Defendant's repeated acts of removing the Mezuzah in disruption of the Bloch's period of mourning, without honoring the agreement to allow the Mezuzah to be placed on the exterior doorpost of the Subject Property, amount to extreme and outrageous conduct.

68. The Defendant's conduct was intentional and outrageous.

69. The Defendant's intentional conduct caused the Blochs to suffer severe emotional distress, and mental anguish.



70. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

### **Count 13**

#### **BREACH OF FIDUCIARY DUTY UNDER 765 ILCS 605/18.4**

71. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

72. At all times relevant, Defendant, was in a fiduciary relationship with the Blochs.

73. Defendant Shoreline Towers Condominium Association is responsible, as principal, for the acts of its agents, employees and servant members.

74. Under Condominium Property Act, Defendant had a duty to:

- a. Perform its duties as an association in a reasonable manner and with due care for the welfare of Shoreline Towers Condominium's members (including the Blochs) and their property.
- b. Perform its duties as an association with due regard for the provisions and duties set forth in the Condominium Property Act and the Declarations and Bylaws conduct any investigations of complaints against the Blochs in

a reasonable manner;

c. Perform its duties as an Association with due regard for the provisions and duties set forth in the Fair Housing Act and its regulations.

d. Otherwise act in its fiduciary relationship with the Blochs.

75. Defendant, Shoreline Towers Condominium Association breached its fiduciary duty to the Blochs by failing in its duties owed to the Blochs, by acting in a willful and wanton manner, and by engaging in bad faith and unfair dealing.

76. In addition, Defendant Shoreline Towers Condominium Association breached its fiduciary duty to the Blochs when it used its particular and superior position to intimidate, and interfere with the Blochs' housing rights.

77. As a direct and proximate cause of Defendant's breach of the fiduciary duty, the Blochs were injured and sustained emotional distress, embarrassment and other injury and continue to suffer emotional distress, embarrassment and other injury.

78. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the Defendants from prohibiting the placing of the Mezuzah on the exterior doorpost of the Subject Property and prohibiting the Defendants from removing the Mezuzah placed on the exterior doorpost of the Subject Property. That the court award damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

**Count 14**

**DEFAMATION IN THE FORM OF LIBEL AND SLANDER**

79. The Blochs restate and re-allege paragraphs 1 through 21 of this Complaint as though the same were fully set forth and pleaded herein.

80. The actions of Defendant Shoreline Towers Condominium Association of publishing knowingly false statements about the Blochs and distributing the published materials and knowingly making false statements about the Blochs to third parties constitute defamation in the form of libel and slander.

81. Wherefore, Plaintiffs pray the court to enter a Temporary Restraining Order, a Preliminary Injunction and a Permanent Injunction enjoining the defendant from prohibiting the placing of a Mezuzah on the exterior doorpost of the subject Property and prohibiting the Defendant from removing the Mezuzah placed on the exterior doorpost of the subject Property. That the court award actual damages for the injury to the Plaintiffs including damages for mental anguish, humiliation and embarrassment, punitive damages for actions done with malice or with careless disregard for the rights of the Plaintiffs, attorney's fees and costs and such other relief as the court shall deem just and proper.

**Respectfully Submitted,**

A handwritten signature in black ink, appearing to read "Daniel Weiss", with a long horizontal flourish extending to the right.

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