

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

HORIZON GROUP MANAGEMENT, LLC, an
Illinois limited liability company,

Plaintiff,

v.

AMANDA BONNEN,

Defendant.

No.

JURY DEMAND

2009L008675
CALENDAR/ROOM B
TIME 00:00
Libel/Slander

VERIFIED COMPLAINT

Plaintiff, HORIZON GROUP MANAGEMENT, LLC, an Illinois limited liability company ("Plaintiff"), by its attorneys, complains against Defendant, AMANDA BONNEN ("Defendant") as follows:

1. At all times mentioned below and prior and subsequent to thereto, Plaintiff was and still is a limited liability company duly organized and existing under Illinois law, with its principal office and place of business in Chicago, Cook County, Illinois. Plaintiff conducts business under the name "Horizon Realty Group," "Horizon Group" and "Horizon" and is recognized as one of Chicago's premiere apartment leasing and management companies because it understands the importance of quality customer service and a well-maintained living environment.

2. Defendant is now, and at all times mentioned below was, a person residing in Chicago, Cook County, Illinois. She was a tenant of Plaintiff, residing at 4242 N. Sheridan Road, Chicago, Illinois.

3. At the time of the commission by Defendant of the grievances mentioned below, and for a long time before then, Plaintiff was a company of good name, fame, and reputation and

was deservedly held in high esteem by and among renters, potential renters and the general public.

4. Twitter is a free social network on the World Wide Web that allows users to send and read messages; the messages are referred to as 'Tweets.' Tweets are posts of up to 140 characters and are displayed on the Tweet author's profile page and are delivered to the author's followers.

5. A person with a Twitter account can make his or her profile page private or public. If the account is private, only persons approved by the account holder can view his or her profile page and receive account updates. If the account is public, anybody in the world can view the account holder's Tweets.

6. Defendant's Twitter account is public.

7. On or about 9:08 am on May 12, 2009, in Chicago, Illinois, Defendant maliciously and wrongfully composed and wrote a certain Tweet. The Tweet contained false and defamatory matter concerning Plaintiff, namely: "...Who said sleeping in a moldy apartment was bad for you? Horizon realty thinks it's okay." A copy of the Tweet is attached as Exhibit A.

8. Defendant then and there maliciously and wrongfully published the false and defamatory Tweet on Twitter, thereby allowing the Tweet to be distributed throughout the world.

9. The statements in the Tweet concerning Plaintiff were and are wholly false. By reason of the publication of them, Plaintiff has been greatly injured in its reputation as a landlord in Chicago.

10. Because the statement damaged the Plaintiff's reputation in its business, the statement is liable per se. Damages are presumed.

WHEREFORE, Plaintiff, HORIZON REALTY GROUP, LLC, an Illinois limited liability company, respectfully requests that judgment be entered in its favor and against Defendant, AMANDA BONNEN, in the amount in excess of \$50,000 and court costs to the date of entry of judgment and the costs of suit herein, and any other relief this court deems just and proper.

Dated: July 20, 2009

Respectfully submitted,

HORIZON REALTY GROUP, LLC, an Illinois
limited liability company

By: 

One Of Its Attorneys

Bret A. Rappaport
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VERIFICATION

Under penalties as provided by law pursuant to Section 1 109 of the Code of Civil Procedure, the undersigned certifies that he is an authorized agent for Horizon Realty Group, LLC the Plaintiff herein, a limited liability company organized and doing business in the State of Illinois, that he has read the foregoing Verified Complaint and certifies that the statements set forth in this instrument are true and correct.



JEFF MICHAEL

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Hey there! abonnen is using Twitter.

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[Join today!](#)

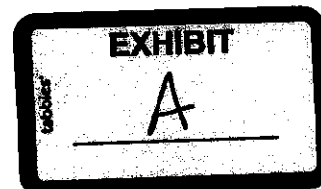
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abonnen

1. Forgot how much I love the decemberists. about 23 hours ago from [mobile web](#)
2. Back to the shire. Up since 4am catching an early flight, now class all day. I should have stayed in FL. 11:02 AM Jul 13th from [mobile web](#)
3. I look like rudolph but except it just being my nose. It's all over. Wonderful. A good tan better come out of this. 9:10 AM Jul 12th from [web](#)
4. [@KelseyThacker](#) Yeah that ALWAYS happens! I wish I would have read the book first. 9:09 AM Jul 12th from [web](#) in reply to [KelseyThacker](#)
5. Just lost about ten pounds in tears after seeing my sister's keeper. That was a rough one... 9:20 PM Jul 10th from [mobile web](#)
6. Top five of worst flights ever. Never again spirit air. 3:45

<http://twitter.com/abonnen>



7/17/2009

- PM Jul 9th from [mobile web](#)
7. All of these people eating McDonalds is making me want to hurl. [12:28 PM Jul 9th from mobile web](#)
 8. I can tell im on the right flight for fort meyers. the average age tends to be about 70. [12:09 PM Jul 9th from mobile web](#)
 9. Damn you Ohare and your 2hr security lines. [11:25 AM Jul 9th from mobile web](#)
 10. <http://dontevenreply.com> [4:57 PM Jul 8th from mobile web](#)
 11. Needs to build an entire model tonight. [12:02 PM Jul 8th from mobile web](#)
 12. Free HBO, curb your enthusiasm is on. Perfect. [3:28 PM Jul 7th from mobile web](#)
 13. Watching a hippie play hacky-sak on the el. Surprisingly...he's not very good. Maybe it's because he is wearing socks over his sandels... [1:53 PM Jul 7th from mobile web](#)
 14. Just a few more classes then off to florida. Totes getting jacked and tan. [8:24 AM Jul 6th from mobile web](#)
 15. Boilermaker recession special = death [10:13 AM Jul 3rd from mobile web](#)
 16. Whoever designed the train with the bi-fold doors was a duche. [4:30 PM Jul 2nd from mobile web](#)
 17. Praying for this one. [10:28 AM Jun 30th from mobile web](#)
 18. Wedding numero 2. Destination...Pittsburgh. [1:26 PM Jun 27th from mobile web](#)
 19. So the king of pop is dead... Get ready for the crazies with doves to come out in force. [5:12 PM Jun 25th from mobile web](#)
 20. @KelseyThacker Hey! I'm actually going to be in Pittsburg for a wedding this weekend...that time of year I guess. How long are you in town? [10:54 AM Jun 25th from web in reply to KelseyThacker](#)
 21. To run or not to run? The temp. says 93...I might die out there. [12:14 PM Jun 23rd from mobile web](#)
 22. My Uhaul was towed today. Who tows a Uhaul while people are moving? Really chicago? [7:00 PM Jun 20th from mobile web](#)
 23. Neocon today. [11:33 AM Jun 17th from web](#)
 24. Guerilla truck show tonight @west fulton market. Go there. [12:24 PM Jun 16th from mobile web](#)
 25. Pardon my language but I really have a big problem with dickheads. [12:18 PM Jun 16th from mobile web](#)
 26. Packing for the big move friday. FINALLY. [10:36 AM Jun 15th from mobile web](#)
 27. Game 7 tonight. GO PENS !! [2:43 PM Jun 12th from mobile web](#)
 28. @JessBin329 Will you be gracing us with your presence this weekend? [9:10 AM Jun 5th from web in reply to](#)

- *Name Amanda Bonnen*
- *Location Chicago, IL*

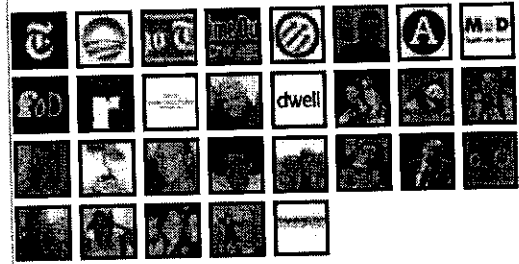
29 Following 20 Followers

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[JessBin329](#)

29. Taking advantage of this beautiful day in Chicago, then half price margarita pitchers tonight :)9:08 AM Jun 5th from web
30. Yay wedding season!1:51 PM May 30th from mobile web
31. [@JessBin329](#) Oh and Keith crushed a girl. It was amazing.10:17 AM May 28th from web in reply to [JessBin329](#)
32. [@JessBin329](#) I think I've already jumped over. P.S. Sorry we missed ya at the game. Don't worry, we didn't win or anything. haha10:16 AM May 28th from web in reply to [JessBin329](#)
33. I have a rather large to do list at the moment & not enough time to accomplish it. Ugh...11:43 AM May 27th from web
34. [@Mizzle27](#) I've been good. Just flying around all over as of recent. I just got back from Boston & I leave for Phillie fri. Hows AZ?11:42 AM May 27th from web in reply to [Mizzle27](#)
35. Back to the chi.4:30 AM May 26th from mobile web
36. Just fell down the stairs & broke a heel. Nice job Amanda.6:09 PM May 25th from mobile web
37. Excited to see Nahant friends I haven't seen in years.3:31 PM May 24th from web
38. I didn't sign up for this.9:57 AM May 24th from mobile web
39. unh graduation finally OVER. Apparently they also are really fond of yogurt here I found out.11:03 AM May 23rd from mobile web
40. BOSTOOOON!15:36 AM May 21st from mobile web
41. Modern wing today :)6:04 AM May 20th from mobile web
42. A dog smaller than a pigeon tried to attack me this morning.6:55 AM May 19th from mobile web
43. Had a brief heart attack last night after dropping the black berry and watching it split into pieces. Idiot.12:22 PM May 16th from web
44. Cubs game. Please don't rain.7:40 AM May 15th from web
45. looking forward to cubs game & greenfest!3:25 PM May 14th from mobile web
46. [@JessB123](#) You should just come anyway. Who said sleeping in a moldy apartment was bad for you? Horizon realty thinks it's okay.9:08 AM May 12th from web in reply to [JessBergman](#)
47. [@ambfitzy](#) I'll be downtown all day. Call me or else we're not friends. tweet tweet.9:06 AM May 12th from web in reply to [ambfitzy](#)
48. My wardrobe malfunctions are way to frequent.9:03 AM May 12th from web

Following



RSS feed of abonnen's updates

49. Not feeling well.8:44 PM May 8th from web
50. <http://thisisphotobomb.com/>9:07 PM May 5th from web
51. Isn't into this whole legal process thing.3:29 PM May 4th from mobile web
52. Om?!1:09 PM May 2nd from mobile web
53. Tooth action tonight!12:56 PM May 1st from mobile web
54. We may not win games, but we ALWAYS win at drinking and looking damn good. Good job team. \$213 bar tab on dollar beer night. So proud.12:30 PM Apr 30th from web
55. Is going to get dominated by a bunch of 9ft Gigantors on the bball court tomorrow...wearing a pink shirt that says "space jamz!". Awesome.6:48 PM Apr 28th from web
56. Running + raining = I'm going to go eat instead.6:29 PM Apr 27th from web
57. <http://tinyurl.com/d5j2sz5>:42 PM Apr 27th from web
58. sweet. In public and just realized there is a huge blazin hole in my sweater. Why do I continue to shop at urban again??12:27 PM Apr 27th from mobile web
59. Dunkin' D's you are so good to me.8:23 AM Apr 27th from mobile web
60. coworker thinks her son may have swine flu...Reeeally? Seeriously?7:31 AM Apr 27th from mobile web

more

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