

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANNABEL MELONGO,

Plaintiff,

v.

ASA ROBERT PODLASEK; ASA JULIE GUNNIGLE; INVESTIGATOR KATE O'HARA (Star No. 423); INVESTIGATOR JAMES DILLON (Star No. 1068); INVESTIGATOR ANTONIO RUBINO (Star No. 5043); INVESTIGATOR RICH LESIAK (Star No. 5000); UNKNOWN COOK COUNTY SHERIFF OFFICERS; DR. MATTHEW S. MARKOS; ASST. ATTY. GENERAL KYLE FRENCH; COOK COUNTY SHERIFF THOMAS DART; COOK COUNTY; INVESTIGATOR RANDY ROBERTS; SCHILLER PARK DET. WILLIAM MARTIN; VILLAGE OF SCHILLER PARK; CAROL SPIZZIRRI,  
Defendants.

No. 13-cv-4924

Judge John Z. Lee

**DEFENDANT, CAROL SPIZZIRRI, ANSWER TO  
PLAINTIFF'S SECOND AMENDED COMPLAINT**

NOW COMES Defendant, CAROL SPIZZIRRI, by and through her attorney, Donald J. Angelini, Jr. of the Law Firm of Angelini & Angelini, and for her Answer to Plaintiff, ANNABEL K. MELONGO's, Second Amended Complaint, states as follows:

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 1, and thus denies same.
2. Defendant admits that she was the Founder and President of Save a Life Foundation ("SALF") but denies all else in Paragraph 2.
3. Defendant denies Paragraph 3 in its entirety.
4. Defendant denies Paragraph 4 in its entirety.

5. Defendant denies Paragraph 5 in its entirety.
6. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 6, and thus denies same.
7. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 7, and thus denies same.
8. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 8, and thus denies same.
9. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 9, and thus denies same.
10. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 10, and thus denies same.
11. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 11, and thus denies same.
12. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 12, and thus denies same.
13. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 13, and thus denies same.

**PARTIES**

14. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 14, and thus denies same.
15. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 15, and thus denies same.

16. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 16, and thus denies same.
17. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 17, and thus denies same.
18. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 18, and thus denies same.
19. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 19, and thus denies same.
20. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 20, and thus denies same.
21. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 21, and thus denies same.
22. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 22, and thus denies same.
23. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 23, and thus denies same.
24. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 24, and thus denies same.
25. Defendant admits Paragraph 25.

**JURISDICTION AND VENUE**

26. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 26, and thus denies same.

27. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 27, and thus denies same.

28. Defendant admits venue is proper in the Northern District of Illinois but denies the allegations of events asserted by Plaintiff.

29. Defendant admits this Court has jurisdiction.

**FACTUAL ALLEGATIONS**

30. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 30, and thus denies same.

31. Defendant admits Paragraph 31.

32. Defendant denies Paragraph 32 in its entirety.

33. Defendant denies Paragraph 33 in its entirety.

34. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 34, and thus denies same.

35. Defendant denies Paragraph 35 in its entirety.

36. Defendant denies Paragraph 36 in its entirety.

37. Defendant denies Paragraph 37 in its entirety.

38. Defendant denies Paragraph 38 in its entirety.

39. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 39, and thus denies same.

40. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 40, and thus denies same.

41. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 41, and thus denies same.

42. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 42, and thus denies same.
43. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 43, and thus denies same.
44. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 44, and thus denies same.
45. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 45, and thus denies same.
46. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 46, and thus denies same.
47. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 47, and thus denies same.
48. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 48, and thus denies same.
49. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 49, and thus denies same.
50. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 50, and thus denies same.
51. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 51, and thus denies same.
52. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 52, and thus denies same.

53. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 53, and thus denies same.
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56. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 56, and thus denies same.
57. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 57, and thus denies same.
58. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 58, and thus denies same.
59. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 59, and thus denies same.
60. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 60, and thus denies same.
61. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 61, and thus denies same.
62. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 62, and thus denies same.
63. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 63, and thus denies same.

64. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 64, and thus denies same.
65. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 65, and thus denies same.
66. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 66, and thus denies same.
67. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 67, and thus denies same.
68. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 68, and thus denies same.
69. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 69, and thus denies same.
70. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 70, and thus denies same.
71. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 71, and thus denies same.
72. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 72, and thus denies same.
73. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 73, and thus denies same.
74. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 74, and thus denies same.

75. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 75, and thus denies same.
76. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 76, and thus denies same.
77. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 77, and thus denies same.
78. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 78, and thus denies same.
79. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 79, and thus denies same.
80. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 80, and thus denies same.
81. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 81, and thus denies same.
82. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 82, and thus denies same.
83. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 83, and thus denies same.
84. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 84, and thus denies same.
85. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 85, and thus denies same.



86. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 86, and thus denies same.

87. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 87, and thus denies same.

88. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 88, and thus denies same.

89. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 89, and thus denies same.

90. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 90, and thus denies same.

91. Defendant is without knowledge or information sufficient to form a belief as to the truth of Paragraph 91, and thus denies same.

**COUNT I**

92 – 93. As Count I, Paragraphs 92 and 93, do not make any allegations against this Defendant, this Defendant makes no answer

**COUNT II**

94 – 98. As Count II, Paragraphs 94 through 98, do not make any allegations against this Defendant, this Defendant makes no answer.

**COUNT III**

99 – 103. As Count III, Paragraphs 99 through 103, do not make any allegations against this Defendant, this Defendant makes no answer.

**COUNT IV**

Defendant hereby incorporates each and every other answer as through fully set forth herein in answer to Count IV.

104. Defendant denies Paragraph 104 in its entirety.

105. Defendant denies Paragraph 105 in its entirety.

106. Defendant denies Paragraph 106 in its entirety.

**COUNT V**

107 – 109. As Count V, Paragraphs 107 through 109, do not make any allegations against this Defendant, this Defendant makes no answer.

**COUNT VI**

Defendant hereby incorporates each and every other answer as through fully set forth herein in answer to Count VI.

110. Defendant denies Paragraph 110 in its entirety.

**DAMAGES**

Defendant hereby incorporates each and every other answer as through fully set forth herein in answer to Plaintiff's alleged damages.

111. Defendant denies Paragraph 111 in its entirety, including subparts (a) through (j).

WHEREFORE, Defendant, CAROL SPIZZIRRI, respectfully requests that this Court enter judgment in her favor and against Plaintiff, that this action be dismissed with prejudice, and that costs be assessed against Plaintiff.

Dated: August 18, 2015

Respectfully Submitted,

/s/ Donald J. Angelini, Jr.  
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