

5. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ASPEN DENTAL, and was acting within the scope of her apparent agency and authority.

6. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ABD DENTAL, and was acting within the scope of her agency and employment.

7. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ABD DENTAL, and was acting within the scope of her apparent agency and authority.

8. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, owned, operated, managed, maintained and controlled a dental practice commonly known as "Aspen Dental," located at 13442 S. Cicero Avenue, Crestwood, Illinois 60445 (the "Crestwood Aspen Dental").

9. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, hired Armani A. Alexander as a dental hygienist at the Crestwood Aspen Dental.

10. Prior to being hired by Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, Armani A. Alexander had a criminal background exhibiting moral turpitude.

11. Prior to being hired, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, conducted a background check and knew, or should have known, that Armani A. Alexander had a criminal background exhibiting moral turpitude.

12. On or about August 12, 2020, and at all times mentioned herein, Plaintiff, ALYSSA RAINE, was a dental assistant and was providing dental services to patients at the Crestwood Aspen Dental.

13. On and after August 12, 2020, Armani A. Alexander placed two (2) hidden cameras in the unisex bathroom at the Crestwood Aspen Dental with the intention of recording people using the bathroom.

14. On and after August 12, 2020, Plaintiff, ALYSSA RAINE, was recorded using the bathroom on both cameras on multiple occasions.

15. On October 22, 2020, the first camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

16. On October 22, 2020, Armani A. Alexander admitted to placing the camera in the unisex bathroom.

17. On October 22, 2020, Armani A. Alexander was arrested by the Crestwood Police Department and was charged with multiple misdemeanor counts related to his recordings at the Crestwood Aspen Dental.

18. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, assured Plaintiff, ALYSSA RAINE, that the Crestwood Aspen Dental was checked and there were no other cameras.

19. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, stated that Armani A. Alexander's background check was flagged for criminal activity.

20. On October 26, 2020, the second camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

21. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, had a duty to exercise reasonable care in the hiring of employees to ensure the safety and well-being of others.

22. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, knew or should have known that Armani A. Alexander had a criminal background exhibiting moral turpitude that made him unfit to be a dental hygienist at the Crestwood Aspen Dental.

23. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, knew or should have known that Armani A. Alexander was unfit to be a dental hygienist at the Crestwood Aspen Dental.

24. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, breached their duty by negligently hiring Armani A. Alexander as a dental hygienist.

25. As a direct and proximate result of the aforementioned acts and/or omissions by the Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, the Plaintiff, ALYSSA RAINE, suffered injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiff, ALYSSA RAINE, demands judgment against Defendants, ASPEN DENTAL MANAGEMENT, INC., ABD DENTAL ASSOCIATES, LLC and ABIGAIL BRIER, D.M.D., and each of them, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT II – NEGLIGENT SUPERVISION

Plaintiff, ALYSSA RAINE, by her attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendants, ASPEN DENTAL MANAGEMENT, INC. (hereinafter “ASPEN DENTAL”), ABD DENTAL ASSOCIATES, LLC (hereinafter “ABD DENTAL”) and ABIGAIL BRIER, D.M.D. (hereinafter “BRIER”), and each of them, states as follows:

1. On or about August 12, 2020, and at all times mentioned herein, Defendant, ASPEN DENTAL, was a duly licensed corporation.

2. On or about August 12, 2020, and at all times mentioned herein, Defendant, ABD DENTAL, was a limited liability company.

3. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a Doctor of Medicine in Dentistry.

4. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ASPEN DENTAL, and was acting within the scope of her agency and employment.

5. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ASPEN DENTAL, and was acting within the scope of her apparent agency and authority.

6. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ABD DENTAL, and was acting within the scope of her agency and employment.

7. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ABD DENTAL, and was acting within the scope of her apparent agency and authority.

8. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, owned, operated, managed, maintained and controlled a dental practice commonly known as “Aspen Dental,” located at 13442 S. Cicero Avenue, Crestwood, Illinois 60445 (the “Crestwood Aspen Dental”).

9. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, hired Armani A. Alexander as a dental hygienist at the Crestwood Aspen Dental.

10. Prior to being hired by Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, Armani A. Alexander had a criminal background exhibiting moral turpitude.

11. Prior to being hired, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, conducted a background check and knew, or should have known, that Armani A. Alexander had a criminal background exhibiting moral turpitude.

12. On or about August 12, 2020, and at all times mentioned herein, Plaintiff, ALYSSA RAINE, was a dental assistant and was providing dental services to patients at the Crestwood Aspen Dental.

13. On and after August 12, 2020, Armani A. Alexander placed two (2) hidden cameras in the unisex bathroom at the Crestwood Aspen Dental with the intention of recording people using the bathroom.

14. On and after August 12, 2020, Plaintiff, ALYSSA RAINE, was recorded using the bathroom on both cameras on multiple occasions.

15. On October 22, 2020, the first camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

16. On October 22, 2020, Armani A. Alexander admitted to placing the camera in the unisex bathroom.

17. On October 22, 2020, Armani A. Alexander was arrested by the Crestwood Police Department and was charged with multiple misdemeanor counts related to his recordings at the Crestwood Aspen Dental.

18. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, assured Plaintiff, ALYSSA RAINE, that the Crestwood Aspen Dental was checked and there were no other cameras.

19. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, stated that Armani A. Alexander's background check was flagged for criminal activity.

20. On October 26, 2020, the second camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

21. On and after the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, had a duty to exercise reasonable care in the supervision of their employee, Armani A. Alexander.

22. On and after the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, failed to supervise Armani A. Alexander by failing to learn of his criminal background exhibiting moral turpitude and allowing him to remain their employee.

23. On and after the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, failed to supervise Armani A. Alexander by failing to employ appropriate policies and procedures to determine that Armani A. Alexander had a criminal background exhibiting moral turpitude and was unfit to be their employee.

24. As a direct and proximate result of the aforementioned acts and/or omissions by the Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, the Plaintiff, ALYSSA RAINE, suffered injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiff, ALYSSA RAINE, demands judgment against Defendants, ASPEN DENTAL MANAGEMENT, INC., ABD DENTAL ASSOCIATES, LLC and ABIGAIL BRIER, D.M.D., and each of them, in an amount in excess of FIFTY THOUSDAND DOLLARS (\$50,000.00).

COUNT III – NEGLIGENT RETENTION

Plaintiff, ALYSSA RAINE, by her attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendants, ASPEN DENTAL MANAGEMENT, INC. (hereinafter “ASPEN DENTAL”), ABD DENTAL ASSOCIATES, LLC (hereinafter “ABD DENTAL”) and ABIGAIL BRIER, D.M.D. (hereinafter “BRIER”), and each of them, states as follows:

1. On or about August 12, 2020, and at all times mentioned herein, Defendant, ASPEN DENTAL, was a duly licensed corporation.

2. On or about August 12, 2020, and at all times mentioned herein, Defendant, ABD DENTAL, was a limited liability company.

3. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a Doctor of Medicine in Dentistry.

4. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ASPEN DENTAL, and was acting within the scope of her agency and employment.

5. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ASPEN DENTAL, and was acting within the scope of her apparent agency and authority.

6. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ABD DENTAL, and was acting within the scope of her agency and employment.

7. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ABD DENTAL, and was acting within the scope of her apparent agency and authority.

8. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, owned, operated, managed, maintained and controlled a dental practice commonly known as "Aspen Dental," located at 13442 S. Cicero Avenue, Crestwood, Illinois 60445 (the "Crestwood Aspen Dental").

9. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, hired Armani A. Alexander as a dental hygienist at the Crestwood Aspen Dental.

10. Prior to being hired by Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, Armani A. Alexander had a criminal background exhibiting moral turpitude.

11. Prior to being hired, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, conducted a background check and knew, or should have known, that Armani A. Alexander had a criminal background exhibiting moral turpitude.

12. On or about August 12, 2020, and at all times mentioned herein, Plaintiff, ALYSSA RAINE, was a dental assistant and was providing dental services to patients at the Crestwood Aspen Dental.

13. On and after August 12, 2020, Armani A. Alexander placed two (2) hidden cameras in the unisex bathroom at the Crestwood Aspen Dental with the intention of recording people using the bathroom.

14. On and after August 12, 2020, Plaintiff, ALYSSA RAINE, was recorded using the bathroom on both cameras on multiple occasions.

15. On October 22, 2020, the first camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

16. On October 22, 2020, Armani A. Alexander admitted to placing the camera in the unisex bathroom.

17. On October 22, 2020, Armani A. Alexander was arrested by the Crestwood Police Department and was charged with multiple misdemeanor counts related to his recordings at the Crestwood Aspen Dental.

18. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, assured Plaintiff, ALYSSA RAINE, that the Crestwood Aspen Dental was checked and there were no other cameras.

19. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, stated that Armani A. Alexander's background check was flagged for criminal activity.

20. On October 26, 2020, the second camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

21. On and after the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, had a duty to exercise reasonable care in the retention of their employee, Armani A. Alexander.

22. On and after the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, negligently retained Armani A. Alexander despite his criminal background exhibiting moral turpitude and allowed him to remain their employee.

23. As a direct and proximate result of the aforementioned acts and/or omissions by the Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, the Plaintiff, ALYSSA RAINE, suffered injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiff, ALYSSA RAINE, demands judgment against Defendants, ASPEN DENTAL MANAGEMENT, INC., ABD DENTAL ASSOCIATES, LLC and ABIGAIL BRIER, D.M.D., and each of them, in an amount in excess of FIFTY THOUSDAND DOLLARS (\$50,000.00).

COUNT IV – INTRUSION UPON SECLUSION

Plaintiff, ALYSSA RAINE, by her attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendants, ASPEN DENTAL MANAGEMENT, INC. (hereinafter "ASPEN

DENTAL”), ABD DENTAL ASSOCIATES, LLC (hereinafter “ABD DENTAL”) and ABIGAIL BRIER, D.M.D. (hereinafter “BRIER”), and each of them, states as follows:

1. On or about August 12, 2020, and at all times mentioned herein, Defendant, ASPEN DENTAL, was a duly licensed corporation.

2. On or about August 12, 2020, and at all times mentioned herein, Defendant, ABD DENTAL, was a limited liability company.

3. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a Doctor of Medicine in Dentistry.

4. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ASPEN DENTAL, and was acting within the scope of her agency and employment.

5. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ASPEN DENTAL, and was acting within the scope of her apparent agency and authority.

6. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized actual agent and employee of Defendant, ABD DENTAL, and was acting within the scope of her agency and employment.

7. On or about August 12, 2020, and at all times mentioned herein, Defendant, BRIER, was a duly authorized apparent agent of Defendant, ABD DENTAL, and was acting within the scope of her apparent agency and authority.

8. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, owned, operated, managed, maintained and controlled a dental practice

commonly known as “Aspen Dental,” located at 13442 S. Cicero Avenue, Crestwood, Illinois 60445 (the “Crestwood Aspen Dental”).

9. On or about August 12, 2020, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, hired Armani A. Alexander as a dental hygienist at the Crestwood Aspen Dental.

10. Prior to being hired by Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, Armani A. Alexander had a criminal background exhibiting moral turpitude.

11. Prior to being hired, Defendants, ASPEN DENTAL, ABD DENTAL, BRIER, and other agents and employees of Defendant, ASPEN DENTAL, including Matthew Heald, conducted a background check and knew, or should have known, that Armani A. Alexander had a criminal background exhibiting moral turpitude.

12. On or about August 12, 2020, and at all times mentioned herein, Plaintiff, ALYSSA RAINE, was a dental assistant and was providing dental services to patients at the Crestwood Aspen Dental.

13. On and after August 12, 2020, Armani A. Alexander placed two (2) hidden cameras in the unisex bathroom at the Crestwood Aspen Dental with the intention of recording people using the bathroom.

14. On and after August 12, 2020, Plaintiff, ALYSSA RAINE, was recorded using the bathroom on both cameras on multiple occasions.

15. On October 22, 2020, the first camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

16. On October 22, 2020, Armani A. Alexander admitted to placing the camera in the unisex bathroom.

17. On October 22, 2020, Armani A. Alexander was arrested by the Crestwood Police Department and was charged with multiple misdemeanor counts related to his recordings at the Crestwood Aspen Dental.

18. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, assured Plaintiff, ALYSSA RAINE, that the Crestwood Aspen Dental was checked and there were no other cameras.

19. On October 23, 2020, agents and/or employees of Defendants, ASPEN DENTAL and ABD DENTAL, including Defendant, BRIER, Robert Fontana and Matthew Heald, stated that Armani A. Alexander's background check was flagged for criminal activity.

20. On October 26, 2020, the second camera was discovered in the unisex bathroom at the Crestwood Aspen Dental and was turned over to the Crestwood Police Department.

21. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, had a duty to exercise reasonable care in the hiring of employees to ensure the privacy rights of their employees were maintained.

22. At and before the time Armani A. Alexander was hired, Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, breached their duty to ensure the privacy rights of their employees were maintained by negligently hiring Armani A. Alexander as a dental hygienist.

23. As a direct and proximate result of the aforementioned acts and/or omissions by the Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, there was an

unauthorized intrusion or prying into the seclusion of the Plaintiff, ALYSSA RAINE, in that she was recorded using the bathroom on both cameras on multiple occasions.

24. The matter upon which the intrusion or prying occurred to the Plaintiff, ALYSSA RAINE, was private in that she was recorded using the bathroom on both cameras on multiple occasions.

25. The intrusion or prying that occurred to the Plaintiff, ALYSSA RAINE, is offensive and objectionable to a reasonable person.

26. As a direct and proximate result of the aforementioned acts and/or omissions by the Defendants, ASPEN DENTAL, ABD DENTAL and BRIER, and each of them, the Plaintiff, ALYSSA RAINE, suffered injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiff, ALYSSA RAINE, demands judgment against Defendants, ASPEN DENTAL MANAGEMENT, INC., ABD DENTAL ASSOCIATES, LLC and ABIGAIL BRIER, D.M.D., and each of them, in an amount in excess of FIFTY THOUSDAND DOLLARS (\$50,000.00).

CLIFFORD LAW OFFICES, P.C.



Attorney for the Plaintiff

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