

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
FIRST MUNICIPAL DISTRICT

Jason Sherrick,
Plaintiff,

v.

Case Number: _____

Steven Gore,
Phoebe 649 Investments LLC,
Stairway to Freedom LLC,
Zane Robbins,
Hadley Hall,
Allan Broderick,
Defendants.

VERIFIED COMPLAINT FOR DAMAGES

Now comes the Plaintiff, **Jason Sherrick**, appearing pro se, and for his complaint against **Steven Gore, Phoebe 649 Investments LLC, Stairway to Freedom LLC, Zane Robbins, Hadley Hall**, and **Allan Broderick** (collectively "**Defendants**"), states as follows:

I. NATURE OF THE ACTION

1. This is an action for monetary damages arising from an illegal, retaliatory lockout; material noncompliance with the Chicago Residential Landlord and Tenant Ordinance (RLTO); systemic consumer fraud perpetrated through a network of shell LLCs designed to evade municipal regulations and defraud vulnerable tenants; and the intentional infliction of severe

emotional distress upon the Plaintiff.

II. PARTIES AND JURISDICTION

2. Plaintiff, Jason Sherrick, was at all relevant times a resident of the City of Chicago, residing at 5800 W Melrose St, Chicago, IL 60634.

3. Defendant Phoebe 649 Investments LLC is an Illinois Limited Liability Company and the owner of the property located at 5800 W Melrose St, with a principal office located at 1401 N Roselle Rd, Schaumburg, IL.

4. Defendant Stairway to Freedom LLC is an Illinois Limited Liability Company doing business in Chicago, Illinois, with a principal office located at 1401 N Roselle Rd, Schaumburg, IL.

5. Defendant Steven Gore is the manager and registered agent of Defendants Phoebe 649 Investments LLC and Stairway to Freedom LLC and, upon information and belief, directs the daily operations and policies of these entities.

6. Defendant Zane Robbins was at all relevant times an agent or employee of Stairway to Freedom LLC acting in a management capacity.

7. Defendant Hadley Hall was at all relevant times an agent or employee of Stairway to Freedom LLC acting in a management capacity.

8. Defendant Allan Broderick is the former Director of Stairway to Freedom LLC. At all times relevant to the specific allegations against him, Defendant Broderick was an agent or employee of Stairway to Freedom LLC acting in that capacity.

9. This Court has jurisdiction over this matter as the property is located in Cook County, Illinois, the causes of action arose in Cook County, and the damages sought are within the jurisdictional limits of the Municipal Department of the Circuit Court of Cook County.

III. FACTUAL ALLEGATIONS

10. Plaintiff entered into a rental agreement for a basement unit at the Melrose Street property, establishing tenancy through weekly prepaid rent payments beginning in June 2025 (Exhibit A, Exhibit B, Exhibit C).

11. Throughout the tenancy, Defendants failed to maintain the premises in a habitable condition, ignoring a major foundation failure that allowed substantial groundwater to leak into the Plaintiff's bedroom during heavy rainfall, and leaving laundry facilities broken and

unusable for over a month.

12. Plaintiff independently documented these hazardous conditions by filing a property complaint with the City of Chicago via the 311 system.

13. Defendants additionally fostered an unsafe living environment. In September 2025, Defendant Robbins committed an unprovoked physical battery against another resident, an incident that director Allan Broderick deliberately failed to report and actively attempted to conceal.

14. Upon Plaintiff reporting the aforementioned battery to Defendant Broderick, Broderick failed to appropriately document or address the incident. Instead, Defendant Broderick actively attempted to conceal the staff member's violent conduct by transmitting a text message to Plaintiff instructing him to "keep this to yourself," acting under the erroneous belief that he was communicating directly with the victim (Exhibit D).

15. Furthermore, rather than disciplining the offending employee, Defendant Broderick subsequently attempted to coerce both Plaintiff and the victim into relocating to alternative properties operated by Defendants. As a direct result of management's attempts at concealment and relocation, the victim confided in Plaintiff that he possessed a reasonable fear of being subjected to a retaliatory eviction.

16. On March 25, 2026, Plaintiff submitted a formal written cease-and-desist letter to Defendants, asserting protections under the RLTO and demanding an immediate halt to ongoing harassment, unauthorized entries into private spaces, and administrative abuse (Exhibit E).

17. On March 26, 2026, the day after receiving the Plaintiff's communication, Defendants executed a retaliatory and illegal lockout against the Plaintiff without a valid court order.

18. The lockout was physically carried out by Defendants Robbins and Hall, who acted under the direct, real-time orders of Defendant Gore, who coordinated the illegal eviction via speakerphone. Plaintiff lawfully captured a video recording of this act from a public sidewalk.

19. To facilitate this and other self-help evictions at the property, Defendant Robbins made false statements to on-scene Chicago Police Department officers, successfully deceiving law enforcement into believing the eviction was for breaking the rules of a legitimate treatment program, thereby allowing the illegal lockout to proceed. The exact nature of the deceptive statements utilized by the Defendants is captured on CPD body-worn camera footage.

20. This practice is part of a broader, systemic scheme wherein Defendants operate the Melrose Street property and other locations as illegally converted, off-the-books Single-Room Occupancies (SROs), utilizing their network of shell entities to shield assets from liability and

evade municipal regulations.

21. On April 7, 2026, after discovering Plaintiff's intent to pursue civil litigation, Defendant Gore initiated a retaliatory phone call to Plaintiff. During this call, Defendant Gore attempted to intimidate and coerce Plaintiff into abandoning this lawsuit by explicitly threatening to file a fabricated counterclaim accusing Plaintiff of stealing \$25,000 from a safe located on the property (Exhibit F, Exhibit G).

IV. COUNT I: ILLEGAL LOCKOUT (RLTO § 5-12-160)

22. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1 through 16 as though fully set forth herein.

23. Under Chicago RLTO § 5-12-160, it is strictly unlawful for a landlord, or any person acting at the direction of the landlord, to eject a tenant, deprive them of use of the premises, or otherwise exclude them from their unit without a valid, executed court order.

24. On March 26, 2026, Defendants Gore, Robbins, and Hall intentionally and unlawfully deprived Plaintiff of shelter and access to personal property by changing the electronic door lock code while Plaintiff was standing on the public sidewalk in freezing weather conditions.

25. At no time did Defendants possess a valid eviction judgment, writ of possession, or any

other legal authority authorizing the physical exclusion of the Plaintiff from the property.

26. As a direct result of Defendants' unlawful conduct, Plaintiff suffered actual damages, including but not limited to the deprivation of shelter and personal belongings.

27. Pursuant to RLTO § 5-12-160, Defendants are jointly and severally liable for a statutory penalty of two months' rent or twice the actual damages sustained, whichever is greater, plus reasonable attorneys' fees and costs.

V. COUNT II: CONSUMER FRAUD & DECEPTIVE PRACTICES (815 ILCS 505/)

28. Plaintiff realleges and incorporates by reference the allegations contained in the preceding paragraphs as though fully set forth herein.

29. Under the Illinois Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/2), unfair methods of competition and unfair or deceptive acts or practices—including the use of any deception, fraud, false pretense, false promise, or misrepresentation in the conduct of any trade or commerce—are unlawful.

30. Defendants engaged in a systemic, deceptive business practice by marketing Stairway to Freedom LLC and its associated website (www.stairwaysoberliving.com) as a legitimate,

supportive healthcare and "sober living" provider.

31. In reality, this public-facing entity operates as a fraudulent front designed to conceal Defendant Gore's off-the-books Single-Room Occupancy (SRO) real estate enterprise, allowing Defendants to aggressively expand a property investment portfolio while evading municipal oversight and the strictures of the Chicago RLTO.

32. To execute this scheme, Defendants intentionally target vulnerable individuals with diagnosed disabilities, coercing them into signing illegal residential rental contracts that are fraudulently disguised as clinical documents. By slapping false labels onto what are legally binding residential leases, Defendants deceptively categorize rent-paying tenants as clients in a calculated effort to unlawfully strip them of their statutory rights under the Chicago RLTO.

33. Defendants weaponize this sham healthcare facade to bypass the lawful judicial eviction process entirely. By falsely presenting their illegal, off-the-books Single-Room Occupancy (SRO) real estate business as a legitimate recovery program, Defendants intentionally create a smokescreen to deceive local law enforcement into facilitating illegal lockouts—framing the unlawful ejection of a protected, rent-paying tenant as a routine administrative action.

34. Defendants further engaged in deceptive commercial practices by leasing an unpermitted, structurally hazardous basement unit to the Plaintiff, fraudulently misrepresenting the space as a safe, lawful residential unit while actively concealing a severe foundation failure and

refusing to permit municipal inspections.

35. Defendant Gore deliberately utilizes a complex network of shell corporate entities, including Phoebe 649 Investments LLC, to obfuscate ownership, misrepresent the primary business location, and shield assets from liability arising from these unlawful real estate operations.

36. Defendants intended that Plaintiff and other consumers rely on these ongoing deceptions, misrepresentations, and false promises regarding the nature of the housing and services provided.

37. As a direct and proximate result of Defendants' unfair and deceptive practices, Plaintiff suffered actual, quantifiable damages, including the payment of rent for an uninhabitable and illegally converted unit, and the sudden deprivation of shelter and property.

38. Pursuant to 815 ILCS 505/10a, Plaintiff is entitled to recover actual economic damages, punitive damages for Defendants' willful and wanton conduct, and reasonable attorneys' fees and costs.

VI. COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

39. Plaintiff realleges and incorporates by reference the allegations contained in the preceding

paragraphs as though fully set forth herein.

40. Defendants' conduct was extreme and outrageous. Defendants exploited their position of power as housing providers to systematically abuse, control, and manipulate vulnerable tenants.

41. Specifically, Defendants intentionally inflicted distress by fraudulently assuming unlicensed clinical authority over the Plaintiff; baselessly labeling rent-paying tenants as "clients" or "patients"; performing invasive, unannounced room checks; and coercing Plaintiff to participate in faith-based activities under the constant threat of eviction.

42. This pattern of psychological manipulation culminated in Defendants retaining management with a known history of violence, and subsequently executing a retaliatory, illegal lockout that rendered a disabled tenant homeless during freezing weather conditions without any legal process.

43. Defendants' extreme and outrageous conduct is ongoing. Upon discovering Plaintiff's pursuit of lawful civil remedies, Defendant Gore escalated the psychological manipulation by threatening Plaintiff with fabricated, high-value theft charges in a calculated effort to intimidate Plaintiff into dropping this litigation.

44. Defendants either intended to inflict severe emotional distress or knew there was a high

probability that their conduct would cause such distress.

45. As a direct and proximate result of Defendants' extreme and outrageous actions, Plaintiff has suffered severe emotional distress, trauma, and significant financial hardship.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Enter judgment in favor of Plaintiff and against all Defendants, jointly and severally;

B. Award statutory and actual damages under Chicago RLTO § 5-12-160 for the illegal lockout;

C. Award actual economic damages, punitive damages for willful and wanton conduct, and reasonable costs under the Illinois Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/10a);

D. Award compensatory and punitive damages for Intentional Infliction of Emotional Distress;

E. Grant an award of monetary damages in an amount not to exceed \$30,000, plus the costs

of this suit; and

F. Grant any further relief this Court deems just and equitable.

VERIFICATION Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

Signature: /s/

Jason Sherrick

Date: August 13, 2026

Phone: (708) 483-9000

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