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

No.: 2025L011557

COUNT I - CTA

NOW COMES the Plaintiff, HILARY THORNE, by and through her attorneys,
MITCHELL HOFFMAN & WOLF LLC and for her Complaint at Law against the Defendant,
CHICAGO TRANSIT AUTHORITY, (hereinafter “CTA”), a Municipal Corporation, states as
follows:

1. On and prior to July 10, 2025, the Defendant, CTA, owned and operated the 95th/Dan Ryan CTA Rail Station, located at 14 West 95th Street, Chicago, Illinois, as part of a municipal transportation system.
2. On July 10, 2025, at approximately 5:45am, at the 95th/Dan Ryan CTA Rail Station, the Plaintiff, HILARY THORNE, paid her fare to ride the CTA Red Line train and entered the handicapped faregate when an unknown individual, pushed past her and knocked her to the ground to avoid paying the fare.

3. That for years prior to July 10, 2025, the Defendant, CTA, was aware of the problem of turnstile jumpers and fare evaders at the 95th/Dan Ryan Rail Station and the significant risk of injury to other passengers from being struck or knocked over by those individuals.

4. On information and belief, over the years there have been multiple incidents at the 95th/Dan Ryan Rail Station that have demonstrated a significant lack of security presence by the CTA. Passengers have reported feeling unsafe due to turnstile jumpers, loitering, harassment, theft, and other disturbances that could have been prevented or minimized with appropriate security personnel on site.

5. That on and prior to July 10, 2025, the Defendant, CTA, had identified the 95th/Dan Ryan Rail Station as having a high rate of fare evasion and other incidents which required additional security.

6. That prior to July 10, 2025, the Defendant, CTA, voluntarily entered a contract with ACTION K-9 SECURITY to provide security services including addressing turnstile jumpers, at CTA Rail Stations including at the 95th/Dan Ryan Rail Station, to reduce fare evasion, improve passenger safety, and support existing staff.

7. That on and prior to July 10, 2025, the Defendant, CTA, knew or should have known, that the private security company it had hired, and assigned to the 95th/Dan Ryan Rail Station, to combat turnstile jumping and other security issues was ineffective due to their insufficient training, reluctance to intervene, and failure to maintain visibility and coverage.

8. That on and prior to July 10, 2025, the Defendant CTA maintained security cameras at the 95th/Dan Ryan Rail Station which were monitored at the CTA Monitoring Center, and which would have shown that the private security company was not fulfilling its obligations under the contract at the time of Plaintiff's injury.

9. That at all times relevant the Defendant, CTA, was a common carrier and owed the Plaintiff, and other passengers at the 95th/Dan Ryan Rail Station, a duty to use reasonable care in engaging private security companies to protect passengers.

10. Notwithstanding the above-described duty, the Defendant, CTA, by and through its employee and/or agents, did then and there commit one or more of the following acts of misconduct:

- a. Negligently hired an unfit private security company without conducting a proper investigation of its capacity to fulfill the requirements of the contract;
- b. Negligently hired a private security company without conducting proper background checks, checking references, or performing other due diligence.
- c. Ignored complaints from passengers and others that the private security company was ineffective;
- d. Failing to terminate the private security company when it knew that the company had been ineffective;
- e. Failed to properly supervise and monitor the private security company employees assigned to the 95th/Dan Ryan Rail Station;
- f. Negligently hired a private security company to provide security at the 95th/Dan Ryan Rail Station whose employees were not properly trained;
- g. Negligently hired a private security company to provide security at the 95th/Dan Ryan Rail Station whose employees had no police authority;
- h. Negligently hired a private security company to provide security at the 95th/Dan Ryan Rail Station that failed to intervene to protect the Plaintiff;

- i. Negligently hired a private security company to provide security at the 95th/Dan Ryan Rail Station whose employees were not providing adequate visibility and coverage at the Station.

11. As a direct and proximate result of one or more of the foregoing acts of misconduct on the part of the Defendant, CTA, due to its negligent hiring of a private security company, the Plaintiff was foreseeably struck and knocked down by a turnstile jumper at the 95th/Dan Ryan Rail Station, causing her to sustain serious and permanent injuries leading to medical expenses, lost wages, pain, suffering, disfigurement and loss of a normal life in the past and future.

WHEREFORE, Plaintiff, HILARY THORNE, prays for a judgment against Defendant, CTA, in a sum in excess of the jurisdictional limits of this court plus the costs of this action, and all further relief this Court deems just and proper.

COUNT II-ACTION K-9

NOW COMES the Plaintiff, HILARY THORNE, by and through her attorneys, MITCHELL HOFFMAN & WOLF LLC and for her Complaint at Law against the Defendant, ACTION K-9 SECURITY INC. (hereinafter ACTION K-9), states as follows:

1. On and prior to July 10, 2025, the Defendant, ACTION K-9, was an Illinois corporation providing security services specializing in public safety utilizing canines.
2. That on and prior to July 10, 2025, the Defendant, CTA, had identified the 95th/Dan Ryan Rail Station as having a high rate of fare evasion and other incidents which required heightened and additional security.
3. On July 10, 2025, the Defendant, ACTION K-9, entered a contract with the Defendant, CTA, to provide security services including addressing turnstile jumpers, including at the 95th/Dan Ryan Rail Station, to reduce fare evasion, and improve passenger safety.

4. On information and belief, over the years CTA passengers have reported feeling unsafe due to turnstile jumpers, loitering, harassment, theft, and other disturbances that could have been prevented or minimized with appropriate security personnel on site.

5. That prior to July 10, 2025, the Defendant, ACTION K-9, was aware of the problem of turnstile jumpers/fare evaders at the 95th/Dan Ryan Rail Station and the significant risk of injury to other passengers from being struck or knocked over by those individuals attempting to avoid paying fares to ride CTA trains.

6. On July 10, 2025, at approximately 5:45am, the Plaintiff, HILARY THORNE, paid her fare to ride CTA Red Line train at the 95th/Dan Ryan CTA Station and entered the handicapped faregate when an unknown individual, who had not paid a fare, pushed past her and knocked her to the ground to evade paying the fare.

7. At all times pertinent the Defendant, ACTION K-9, by and through his agents and employees had a duty to provide contracted security services with ordinary care under the circumstances.

8. Notwithstanding the above-described duty, the Defendant, ACTION K-9, by and through its employee and/or agents, did then and there commit one or more of the following acts of misconduct:

- a. failed to properly monitor the area around the fare gate;
- b. failed to properly supervise the area around the fare gate;
- c. failed to control access at the fare gate;
- d. failing to implement necessary security protocols to prevent fare evasion.

9. As a direct and proximate result of one or more of the foregoing acts of misconduct on the part of the Defendant, ACTION K-9, the Plaintiff was foreseeably struck and knocked down by a

turnstile jumper at the 95th/Dan Ryan Rail Station, causing her to sustain serious and permanent injuries leading to medical expenses, lost wages, pain, suffering, disfigurement and loss of a normal life in the past and future.

WHEREFORE, Plaintiff, HILARY THORNE, prays for a judgment against Defendant, ACTION K-9, in a sum in excess of the jurisdictional limits of this court plus the costs of this action, and all further relief this Court deems just and proper.

COUNT III-FIRST AMERICAN SECURITY

NOW COMES the Plaintiff, HILARY THORNE, by and through her attorneys, MITCHELL HOFFMAN & WOLF LLC and for her Complaint at Law against the Defendant, FIRST AMERICAN SECURITY INC. (hereinafter “FIRST AMERICAN”) states as follows:

1. On and prior to July 10, 2025, the Defendant, FIRST AMERICAN, was an Illinois corporation providing security services specializing in public safety.
2. That on and prior to July 10, 2025, the Defendant, CTA, had identified the 95th/Dan Ryan Rail Station as having a high rate of fare evasion and other incidents which required heightened and additional security.
3. On July 10, 2025, the Defendant, ACTION K-9, entered a contract with the Defendant, CTA, to provide security services including addressing turnstile jumpers, including at the 95th/Dan Ryan Rail Station, to reduce fare evasion, improve passenger safety.
4. Prior to July 10, 2025, Defendant, FIRST AMERICAN, was hired as a subcontractor by Defendant, ACTION K-9, to provide security services including addressing turnstile jumpers, including at the 95th/Dan Ryan Rail Station, to reduce fare evasion, improve passenger safety.
5. On information and belief, over the years CTA passengers have reported feeling unsafe due to turnstile jumpers, loitering, harassment, theft, and other disturbances that could have been

prevented or minimized with appropriate security personnel on site.

6. That prior to July 10, 2025, the Defendant, FIRST AMERICAN, was aware of the problem of turnstile jumpers/fare evaders at the 95th/Dan Ryan Rail Station and the significant risk of injury to other passengers from being struck or knocked over by those individuals attempting to avoid paying fares to ride CTA trains.

7. On July 10, 2025, at approximately 5:45am, the Plaintiff, HILARY THORNE, paid her fare to ride CTA Red Line train at the 95th/Dan Ryan CTA Station and entered the handicapped faregate when an unknown individual, who had not paid a fare, pushed past her and knocked her to the ground to evade paying the fare.

8. At all times pertinent the Defendant, FIRST AMERICAN, by and through its agents and employees had a duty to provide the contracted security services with ordinary care under the circumstances.

9. Notwithstanding the above-described duty, the Defendant, FIRST AMERICAN, by and through its employee and/or agents, did then and there commit one or more of the following acts of misconduct:

- a. failed to properly monitor the area around the fare gate;
- b. failed to properly supervise the area around the fare gate;
- c. failed to control access at the fare gate;
- d. failing to implement necessary security protocols to prevent fare evasion.

10. As a direct and proximate result of one or more of the foregoing acts of misconduct on the part of the Defendant, FIRST AMERICAN, the Plaintiff was foreseeably struck and knocked down by a turnstile jumper at the 95th/Dan Ryan Rail Station, causing her to sustain serious and

permanent injuries leading to medical expenses, lost wages, pain, suffering, disfigurement and loss of a normal life in the past and future.

WHEREFORE, Plaintiff, HILARY THORNE, prays for a judgment against Defendant, FIRST AMERICAN, in a sum in excess of the jurisdictional limits of this court plus the costs of this action, and all further relief this Court deems just and proper.

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