

Statement on Behalf of the Plaintiffs

By Enrico J. Mirabelli, Esq.
May 26, 2009

There is no greater misfortune for a parent than to outlive a child. The pain and sadness of such an event is unimaginably multiplied when the misfortune entails not only the death of a child but includes all of one's grandchildren. This heartache is, of course, shared by the remaining sibling.

The family of Sheri, Garrett and Gavin well knows that any monetary award of damages received as a result of the civil action filed today will never adequately compensate them. Mere dollars cannot replace the loss of loved ones nor will they lessen the pain and suffering visited upon Angela DeCicco and Mario Weiss.

In most wrongful death actions a lawsuit is brought to obtain support for the survivors of the victim. Not so – in this case. The perpetrator of this act left no survivors behind.

If there are no survivors and monetary compensation is insufficient the question becomes – Why is this law suit being filed – and for what purpose?

The answer is simple: To strip the culpable party of all financial holdings – all that he has now and all that he may ever have. To allow “one penny” of ill gotten gain to be derived at the expense of Sheri, Garrett and Gavin is not acceptable to those who dearly loved them.

By the dint of their hard work, for which Sheri’s family is eternally grateful, the Major Case Squad pointed us towards the culpable party in this matter. We believe their efforts have been precise and their conclusion accurate. The indictment by the Monroc County State’s Attorney is an affirmation of their conclusion.

The Plaintiffs also believe Christopher Coleman is the culpable party and that he should be held accountable for his actions. That is why he is the sole named defendant in the wrongful death suit filed this day.

We cannot strip Christopher Coleman of his dignity and his humanity. By his own actions he forfeited those virtues in the early morning hours of May 5, 2009.

But what we can do, and what we shall do, is to take from Christopher Coleman his worldly possessions by successfully prosecuting this claim. Christopher Coleman and those who may think like him shall know that crime truly does not pay.

In a civilized society good will always triumph over evil. That is the way it must be and that is the way it shall be. This case shall be no different.

At the time of Mr. Coleman's arrest Sheri's family had a message for him – LET JUSTICE BE DONE.

The Plaintiffs and the remaining members of Sheri's family believe that the concept of justice can only be achieved if we work to insure that the memory of her life and the lives of Garrett and Gavin remain long after the evil acts of Christopher Coleman have been retired to the dust bin of history to perish in obscurity.

To accomplish this goal a Memorial fund has been established to honor and cherish the memory of Sheri, Garrett and Gavin. It is important to Angela and Mario for it to be known that any funds received by them as a result of this lawsuit shall be donated to the Memorial fund. With the help of local citizens and Mayor Hutchinson those funds will be used to erect a lasting tribute in the city of Columbia.

On behalf of the Plaintiffs – Thank you for your prayers and your continuing support.

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
MARIO D. WEISS as brother,)
uncle, and next best friend of)
SHERI COLEMAN, deceased, GARETT) Case No. 09-L-
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)
)
Plaintiffs,)
)
vs.)
)
CHRISTOPHER COLEMAN,)
)
Defendant.)
)
and)
)
JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)
)
Respondent in Discovery,)
)
and)
)
RONALD COLEMAN,)
)
Respondent in Discovery.)

REQUEST FOR PRODUCTION

TO: Joyce Meyer Ministries, Inc.

Registered Agent: Delanie Trusty, 700 Grace Parkway, Fenton, MO 63026

Pursuant to the provisions of Illinois Supreme Court Rule 214, you are hereby requested to furnish Plaintiffs' counsel with copies of the following:

1. Copies of Christopher Coleman's complete personnel file.
2. Copies of all policies of Joyce Meyer Ministries regarding employment with the organization.
3. Copies of Christopher Coleman's work schedule for the past 36 months, including all out of town events, appointments, destinations, and schedules.
4. Copies of all airplane schedules, both commercial and private on which Christopher Coleman is listed as a passenger.
5. Copies of all airplane manifests, both commercial and private on which Christopher Coleman is listed as a passenger.
6. Copies of all private airplane manifests, held by Joyce Meyer Ministries, Inc. which list all passengers.
7. Copies of all reports, correspondence, contracts, agreements or other writings regarding the facts and circumstances alleged in Plaintiffs' Complaint.
8. Copies of the Joyce Meyer Ministries, Inc. policy of employment as it related to Christopher Coleman.
9. Copies of all correspondence, notes, memorandums, deeds, contracts, policies or other documents relating to the hiring of Christopher Coleman.

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
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SHERI COLEMAN, deceased, GARETT) Case No. 09-L-
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)
Plaintiffs,)
vs.)
CHRISTOPHER COLEMAN,)
Defendant.)
and)
JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)
Respondent in Discovery,)
and)
RONALD COLEMAN,)
Respondent in Discovery.)

INTERROGATORIES TO RESPONDENT IN DISCOVERY

TO: Joyce Meyer Ministries, Inc.
c/o Delanie Trusty
700 Grace Parkway
Fenton, MO 63026

Pursuant to Supreme Court Rule, you are requested to answer the following Interrogatories under oath within twenty-eight (28) days of service hereof:

1. State the full name, current residence, and business address, and relationship to Joyce Meyer Ministries, Inc. of all persons answering and signing these interrogatories.

ANSWER:

2. Have you or anyone acting on your behalf had any conversations with any person at any time with regard to the manner in which the occurrence complained of in Plaintiffs' Complaint occurred? If your answer to this interrogatory is in the affirmative, state the following:
 - (a) The date(s) of such conversations and/or statements;
 - (b) The place of such conversations and/or statements;
 - (c) All persons present for the conversations and/or statements;
 - (d) The matters and things stated by the person in the conversation and/or statements;
 - (c) Whether the conversation was oral, written, and/or recorded; and

- (f) Who has possession of the statement if written and/or recorded?

ANSWER:

3. Have you overheard any conversations made by any person at any time with regard to the occurrence complained of in Plaintiffs' Complaint? If your answer to this interrogatory is in the affirmative, state the following:
- (a.) The date(s) one overheard such conversations and/or statements;
 - (b.) The place one overheard such conversations and/or statements;
 - (c.) All persons present for the conversations and/or statements;
 - (d.) The matters and things overheard by the person in the conversation and/or statements;
 - (e.) Whether the conversation was oral, reduced to writing, and/or recorded; and

ANSWER:

4. Do you know of any statements otherwise taken by any former or current employee or staff member of Respondent in Discovery with regard to the allegations made in Plaintiffs' Complaint? and, if so, state the following:
- (a.) Identify who gave such statement and the date the statement was given;
 - (b.) Identify the format of the statement, oral, written, videotaped, audio taped, or otherwise;
 - (c.) Identify who has current possession of said statement;
 - (d.) For each such statement taken, identify the persons present at the time of statement, and the person requesting the taking of each statement.

ANSWER:

5. List the names and addresses of all other persons (other than yourself and persons heretofore listed) who have knowledge of the facts of the occurrence and damages claimed to have resulted from the actions set forth in Plaintiffs' Complaint.

ANSWER:

Section 5/2-402 of the Illinois Code of Civil Procedure

(735 ILCS 5/2-402)

Sec. 2-402. Respondents in discovery. The plaintiff in any civil action may designate as respondents in discovery in his or her pleading those individuals or other entities, other than the named defendants, believed by the plaintiff to have information essential to the determination of who should properly be named as additional defendants in the action.

Persons or entities so named as respondents in discovery shall be required to respond to discovery by the plaintiff in the same manner as are defendants and may, on motion of the plaintiff, be added as defendants if the evidence discloses the existence of probable cause for such action.

A person or entity named a respondent in discovery may upon his or her own motion be made a defendant in the action, in which case the provisions of this Section are no longer applicable to that person.

A copy of the complaint shall be served on each person or entity named as a respondent in discovery.

Each respondent in discovery shall be paid expenses and fees as provided for witnesses.

A person or entity named as a respondent in discovery in any civil action may be made a defendant in the same action at any time within 6 months after being named as a respondent in discovery, even though the time during which an action may otherwise be initiated against him or her may have expired during such 6 month period. An extension from the original 6-month period for good cause may be granted only once for up to 90 days for (i) withdrawal of plaintiff's counsel or (ii) good cause. Notwithstanding the limitations in this Section, the court may grant additional reasonable extensions from this 6-month period for a failure or refusal on the part of the respondent to comply with timely filed discovery.

Statement of Mario D. Weiss

May 26, 2009

I am here on behalf of my sister and my nephews. I would like to thank everyone for their heartfelt support during this very difficult time for my family. I want to publicly thank the Major Case Squad for their extraordinary efforts.

Any and all of the proceeds my mother and I receive from the results of this civil suit will be considered "Sheri's" money and will be used, with the Mayor's blessing, to create a prominent, functional and beautiful memorial for Garrett, Gavin and Sheri in Columbia, Illinois.

Our goal is to extract something positive from such a horrific and senseless tragedy and to honor the lives of my sister and her two young sons.

Synopsis of the Lawsuit

Wrongful Death Statute

Wrongful Death actions are authorized by Illinois Statute 740 ILCS 180 (2007). A suit for wrongful death may be brought in a civil forum for the purpose of obtaining damages by family members of the victims. Those damages, by law, include the following; compensation for sorrow, grief, mental suffering and actual expenses for the surviving spouse or next of kin.

Instant Action

The action filed today on behalf of Angela DeCicco and Mario D. Weiss, family members of the decedents, consists of two (2) separate counts which plead in the alternative. Count I seeks damages for intentional acts while Count II seeks damages if the actions complained of were caused by the negligence of the defendant.

Named Defendant

Christopher Coleman is the sole named Defendant.

Respondents in Discovery

Joyce Meyer Ministries, Inc. is the former employer of Christopher Coleman and is named for the purpose of obtaining discoverable information and documents. Joyce Meyer Ministries, Inc. is not a named Defendant and no damages are sought from the Corporation at this time.

Ronald Coleman is the father of Christopher Coleman and is named for the purpose of obtaining discoverable information and documents. Ronald Coleman is not a named Defendant and no damages are sought from Ronald Coleman at this time.

A copy of the statute providing for "Respondents in Discovery" along with copies of the discovery served on the Corporation and Ronald Coleman are enclosed.

Prayer for Relief

The request for relief in the amount of "in excess of \$50,000.00" is for jurisdictional purposes only. The actual damages sought will be determined at the time of the trial on this matter.

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
MARIO D. WEISS as brother,)
uncle, and next best friend of)
SHERI COLEMAN, deceased, GARETT)
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)

Case No. 09-L-

Plaintiffs,)

vs.)

CHRISTOPHER COLEMAN,)

Defendant.)

and)

JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)

Respondent in Discovery,)

and)

RONALD COLEMAN,)

Respondent in Discovery.)

INTERROGATORIES TO RESPONDENT IN DISCOVERY

TO: Ronald Coleman
304 Dixie Drive
Chester, Illinois 62233

Pursuant to Supreme Court Rule, you are requested to answer the following Interrogatories under oath within twenty-eight (28) days of service hereof:

1. State the full name, current residence, and business address, and relationship to Christopher Coleman of all persons answering and signing these interrogatories.

ANSWER:

2. During the immediate proceeding three years have you or any member of your family held cash or property on behalf of Christopher Coleman? If so, state:
 - a. The name and address of the person or entity holding the cash or property; and
 - b. The type of cash or property held and the value thereof.

ANSWER:

3. During the preceding three years, have you been the holder of or had access to any safety deposit boxes in the name of Christopher Coleman? If so, state the following:

- a. The name of the bank or institution where such box is located;
- b. The number of each box;
- c. A description of the contents of each box during the immediately preceding three years and as of the date of the answer; and
- d. The name and address of any other joint or co-owners of such safety deposit box or any trustees holding the box for your benefit.

ANSWER:

4. During the preceding three years, have you owned with Christopher Coleman, any stocks, bonds, securities or other investments, including savings bonds? If so, with regard to each such stock, bond, security or investment state:
 - a. A description of the stock, bond, security or investment;
 - b. The name and address of the entity issuing the stock, bond, security or investment;
 - c. The present value of such stock, bond, security or investment;

- d. The date of acquisition of the stock, bond, security or investment;
- e. The cost of the stock, bond, security or investment;
- f. The name and address of any other owner or owners in such stock, bond, security or investment; and
- g. If applicable, the date sold and the amount realized therefrom.

ANSWER:

- 5. Do you own or have any incidents of ownership in any life, annuity or endowment insurance policies in which Christopher Coleman has an interest? If so, with regard to each such policy state:
 - a. The name of the company;
 - b. The number of the policy;
 - c. The face value of the policy;
 - d. The present value of the policy;
 - e. The amount of any loan or encumbrance on the policy;
 - f. The date of acquisition of the policy; and
 - g. With regard to each policy, the beneficiary or beneficiaries.

ANSWER:

ANGELA DECICCO, and
MARIO D. WEISS

By: 

Jack Carey #00388025
Attorney for Plaintiffs
23 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

By: 

Enrico J. Mirabelli #35351
Nadler, Pritikin & Mirabelli, LLC
Attorney for Plaintiffs
One Prudential Plaza
130 East Randolph Drive
Suite 1200
Chicago, IL 60601
(312) 861-4600
(312) 861-4666 FAX

STATE OF ILLINOIS)
)
COUNTY OF _____) SS

_____, being first duly sworn on oath, deposes and states that he/she is a respondent in the above-captioned matter; that he/she has read the foregoing document, and the answers made herein are true, correct and complete to the best of his/her knowledge and belief.

Signature

SUBSCRIBED and SWORN to before me this _____ day of _____, 2009.

Notary Public

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
MARIO D. WEISS as brother,)
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SHERI COLEMAN, deceased, GARETT)
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Case No. 09-L-

Plaintiffs,)

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CHRISTOPHER COLEMAN,)

Defendant.)

and)

JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)

Respondent in Discovery,)

and)

RONALD COLEMAN,)

Respondent in Discovery.)

REQUEST FOR PRODUCTION

TO: Ronald Coleman
304 Dixie Drive
Chester, Illinois 62233

Pursuant to the provisions of Illinois Supreme Court Rule 214, you are hereby requested to furnish Plaintiffs' counsel with copies of the following:

1. Copies of Christopher Coleman's tax returns for the last five years.
2. Copies of life insurance policies on Christopher Coleman's life or members of his family.
3. Copies of Christopher Coleman's discharge papers from the military.
4. Copies of Christopher Coleman's foid card.

ANGELA DECICCO, and
MARIO D. WEISS

By: 

Jack Carey #00388025
Attorney for Petitioner
23 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

By: 

Enrico J. Mirabelli #35351
Nadler, Pritikin & Mirabelli, LLC
Attorney for Petitioner
One Prudential Plaza
130 East Randolph Drive
Suite 1200
Chicago, IL 60601
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IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

FILED

MAY 26 2009

Caron L. R...
CLERK OF THE CIRCUIT COURT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,
grandmother and next best
friend to SHERI COLEMAN, deceased,
GARETT COLEMAN, deceased and
GAVIN COLEMAN, deceased, and
MARIO D. WEISS as brother,
uncle, and next best friend of
SHERI COLEMAN, deceased, GARETT
COLEMAN, deceased, and GAVIN
COLEMAN, deceased,

Case No. 09-L-14

Plaintiffs,

vs.

CHRISTOPHER COLEMAN,

Defendant.

and

JOYCE MEYER MINISTRIES, INC.,
a nonprofit organization,

Respondent in Discovery,

and

RONALD COLEMAN,

Respondent in Discovery.

EMERGENCY PETITION FOR INJUNCTIVE RELIEF

NOW COMES the Plaintiffs, ANGELA DeCICCO, (hereinafter referred to as "Angela") as mother, grandmother and next best friend to SHERI COLEMAN, deceased, GARETT COLEMAN, deceased and GAVIN COLEMAN, deceased, (hereinafter referred to as "SHERI", "GARETT" and "GAVIN" respectively) and MARIO D. WEISS, (hereinafter referred to as "MARIO") as brother, uncle and next best friend of SHERI, deceased, GARETT, deceased, and

GAVIN, deceased, by and through their attorneys, JACK CAREY, Attorney at Law, and ENRICO J. MIRABELLI, of Nadler, Pritikin & Mirabelli, LLC, pursuant to Section 11-101 and 11-102 of the Code of Civil Procedure of Illinois and hereby petitions this Honorable Court for the entry of injunctive relief prohibiting the Defendant, CHRISTOPHER COLEMAN, (hereinafter referred to as "CHRISTOPHER") from acts which include but are not limited to selling, pledging, mortgaging, concealing, and depreciating the real property located at 2854 Robert Drive, Columbia, Illinois, (hereinafter referred to as the "Residence") and further providing mandatory injunctive relief by way of, but not limited to providing a list of all items removed from said residence and in support thereof respectively states as follows:

1. This Honorable Court has jurisdiction over the parties hereto and subject matter herein.
2. On Tuesday, May 5, 2009, the Decedents, SHERI and her sons, GARETT and GAVIN, were found murdered in their home located at 2854 Robert Drive, Columbia, Illinois.
3. Upon information and belief, on or about March 2, 2005, a deed was executed listing SHERI and CHRISTOPHER as the owners of said Residence.
4. Information and belief, approximately six (6) months ago, a Quit Claim deed was executed transferring title to said residence to CHRISTOPHER's name alone.
5. Upon information and belief, at the time of the execution of the deed and the conveyance of said property, SHERI did not voluntarily sign the deed transferring title to the Residence to CHRISTOPHER.
6. For a period of approximately seven (7) days after the murder of SHERI, GARETT and GAVIN, the Residence was a crime scene and CHRISTOPHER was not allowed access to the Residence.

7. On May 13, 2009, the residence was released to CHRISTOPHER for his entry and access to the same.
8. On or about MAY 13, 2009, CHRISTOPHER and members of his family entered the Residence and commenced moving personal property out of the Residence.
9. On May 19, 2009, CHRISTOPHER was arrested and charged with the murders of SHERI, GARETT and GAVIN.
10. CHRISTOPHER's application for bond was denied and CHRISTOPHER is currently incarcerated thereby leaving the Residence vacant.
11. At no time did CHRISTOPHER contact any members of SHERI's family or the Plaintiffs herein to advise them that he was going to remove items from the Residence.
12. The above facts establish that the Plaintiffs have just cause to believe that unless CHRISTOPHER, his agents, assigns, and/or those acting at his direction, control or in concert with him are enjoined and restrained from engaging in acts of depreciating the estate of the decedents, CHRISTOPHER has and will continue to engage in actions which conceal, convey, and depreciate the estate of the deceased.
13. To obtain an injunction, a party must establish that (1) it possesses a clearly ascertainable right which needs to be protected; (2) that there will be irreparable injury if the injunctive relief is not granted; (3) that there is no adequate remedy at law for the injury; and (4) there is a likelihood that the Plaintiff will be successful on the merits. In re the Marriage of Stamberg, 218 Ill.App. 3d. 333, 578 N.E. 2d. 261 (1991).
14. Upon information and belief, SHERI, GARETT and GAVIN died intestate.
15. Although under the Probate Act CHRISTOPHER may be the next of kin, because there is a cause of action against CHRISTOPHER for the wrongful death of the decedents for his willful and wanton misconduct and/or negligent actions, there is a conflict of interest between his

personal estates and his duties as a potential administrator of the estate. See e.g. Storer's Estate v. Storer, 131 Ill.App. 2d. 1049, 1053-1054, 269 N.E. 2d. 352 (1971).

16. CHRISTOPHER should rightfully be disqualified as the executor of the estate, the next of kin and successor executor of the decedent's estates should be SHERI's mother, ANGELA. Regardless of whether ANGELA DeCICCO is named as the executor of the estate or a special administrator is appointed, pursuant to the Illinois Probate Act, the executor has certain duties and obligations to the estate of the deceased which include and are not limited to prevention of waste of the estate.

17. Based on the foregoing, ANGELA DeCICCO, as the next of kin and potential executor of the estate of the deceased or any special administrator appointed to be the executor of the estate, possesses a **clearly ascertainable right** to the preservation of the estate and prevention of waste of the estate.

18. In addition, if CHRISTOPHER is not ordered to provide a list of items removed from the Residence and return the items to the Residence, irreparable injury will occur as the estate of the deceased will be depleted in value in an amount which will be unknown to the executor of the estate.

19. Further, **irreparable injury** will occur if the injunctive relief is not granted. Alleged injury is defined as "irreparable injury" when it is of such nature that the injured party cannot be adequately compensated or when damages cannot be measured by any certain pecuniary standard; alternatively, the term has also been defined to encompass such injury as is beyond possibility of repair or beyond possibility of compensation in damages, but that type of injury that ought not be submitted to on one hand or inflicted on the other. Crosswood Productions, Inc. v. Suter, 97 Ill.App. 3d. 282, 422 N.E. 2d. 953 (1981). In the instant matter **irreparable injury** will occur if CHRISTOPHER is allowed to mortgage, borrow against, pledge, sell or

draw against the equity in the residence as the size of the estate has yet to be determined and there may not be adequate assets from other sources to reimburse the estate in an in kind amount to any devaluation, depreciation or waste caused by CHRISTOPHER.

20. There is **no adequate remedy at law** for the injury. An adequate remedy at law is defined as "clear, complete and as practical and efficient to the ends of justice and its prompt administration as the equitable remedy." **American Tel. and Tel. Co. v. Village of Arlington Heights**, 174 Ill.App. 3d. 381, 528 N.E. 2d. 1000 (1988). There can never be an adequate remedy at law to replenish the estate of the deceased if CHRISTOPHER has removed or continues to remove items which are heirlooms, have sentimental value, which are unique and otherwise irreplaceable especially if he does not have the financial ability to do so.

21. Based on the foregoing, Plaintiffs have properly alleged a likelihood of success on the merits. In considering the likelihood of success on the merits, the Plaintiff need only show that his chances for success are better than negligible. **Roland Mach. Co. v. Dresser Indus. Inc.**, 749 F.2d. 380, 387 (1984).

22. Any benefit resulting to the Plaintiffs as a result of the issuance of a restraining order will substantially outweigh any damage suffered by CHRISTOPHER so that no bond is necessary or appropriate.

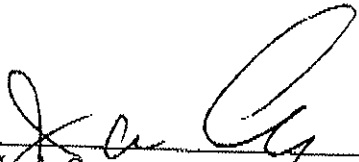
WHEREFORE, the Plaintiffs respectfully pray this Honorable Court as follows:

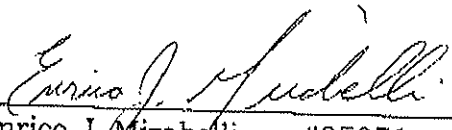
A. This Honorable Court enter a Temporary Restraining Order against the Defendant, CHRISTOPHER COLEMAN, and without bond and thereafter a Preliminary Injunction enjoining and restraining CHRISTOPHER COLEMAN, his agents, assigns, those acting in concert with him and those action under his control from transferring, assigning, encumbering, concealing, hypothecating, pledging, mortgaging, borrowing against, damaging, destroying, depreciating,

selling, withdrawing, dissipating, making gifts of, guaranteeing debts with, expending, or otherwise dealing with or disposing of any of the real or personal property located at 2854 Robert Drive, Columbia, Illinois..

- B. This Honorable Court issue a mandatory injunction requiring Defendant, CHRISTOPHER COLEMAN, to provide a complete and accurate inventory of all items removed from the residence located at 2854 Robert Drive, Columbia, Illinois and ordering the return of all such items removed from the Residence to be promptly returned to said Residence until further order of Court or written agreement of the parties.
- C. That in the event CHRISTOPHER COLEMAN has sold, gifted, or otherwise disposed of any item of personal property taken from the Residence that he be ordered to promptly provide information and an accounting with respect to each item sold, gifted or otherwise disposed of.
- D. That ANGELA DeCICCO, or any of her agents or any person(s) appointed by this Court be allowed access to the Residence for the purpose of photographing the contents thereof and creating an inventory of the personal items remaining therein.
- E. For any and such other further relief as this Honorable Court deems equitable and just.

ANGELA DECICCO, and
MARIO D. WEISS

By: 
Jack Carey #00388025
Attorney for Plaintiffs
23 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

By: 
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Nadler, Pritikin & Mirabelli, LLC
Attorney for Plaintiffs
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SHERI COLEMAN, deceased, GARETT
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Case No. 09-L-

Plaintiffs,

Vs.

CHRISTOPHER COLEMAN,

Defendant.

and

JOYCE MEYER MINISTRIES, INC.,
a nonprofit organization,

Respondent in Discovery,

and

RONALD COLEMAN,

Respondent in Discovery.

**AFFIDAVIT IN SUPPORT OF PETITION FOR VERIFIED
EMERGENCY PETITION FOR INJUNCTIVE RELIEF**

We, ANGELA DeCICCO, and MARIO D. WEISS, Plaintiffs in the above referenced matter, individually and collectively, first being duly sworn under oath, do depose and state as follows:

1. That ANGELA DeCICCO is the mother of the deceased, SHERI COLEMAN, and the grandmother of the deceased, GARETT COLEMAN and GAVIN COLEMAN.

2. That MARIO D. WEISS is the brother of the deceased, SHERI COLEMAN, and the uncle of the deceased GARETT COLEMAN and GAVIN COLEMAN.
3. That on May 5, 2009, the decedent's SHERI COLEMAN and her sons, GARETT COLEMAN and GARETT COLEMAN, were found murdered in their home located at 2854 Robert Drive, Columbia, Illinois 62236.
4. That for approximately seven (7) days after the murder of SHERI COLEMAN, GARETT COLEMAN and GAVIN COLEMAN, the residence was a crime scene and CHRISTOPHER COLEMAN was not allowed access to the residence.
5. That on May 13, 2009, the residence was released to CHRISTOPHER COLEMAN for his entry and access to the same.
6. That on or about May 13, 2009, CHRISTOPHER COLEMAN entered the residence and commenced removing personal property from the residence.
7. That on May 19, 2009, CHRISTOPHER COLEMAN was charged with the murder of SHERI COLEMAN, GARETT COLEMAN and GAVIN COLEMAN.
8. That CHRISTOPHER COLEMAN's application for bond was denied and CHRISTOPHER COLEMAN is currently incarcerated.
9. That the residence at 2854 Robert Drive, Columbia, Illinois, is vacant.
10. That at no time did CHRISTOPHER COLEMAN contact either affiant and upon information and belief, at no time did CHRISTOPHER COLEMAN contact any members of the decedent's families to advise them that he was going to remove items from the residence.
11. That your affiant, ANGELA DeCICCO, and MARIO D. WEISS, are petitioning the Court to appoint them as the special administrators of the estate for SHERI COLEMAN, GARETT COLEMAN and GAVIN COLEMAN.

FURTHER YOUR AFFILIANTS SAYETH NAUGHT.

Angela DeCicco
ANGELA DeCICCO


Mario D. Weiss
MARIO D. WEISS

SUBSCRIBED and SWORN to
before me this 25 Day of

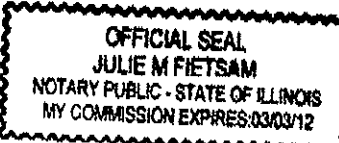
SUBSCRIBED and SWORN to
before me this 25 Day of

May, 2009.

May, 2009

~~Julie M. Fietsam
Notary Public~~


Julie M. Fietsam
Notary Public



Enrico J. Mirabelli, Esq.
Nadler, Pritikin & Mirabelli LLC
Attorney for Plaintiffs
130 E. Randolph Street, 12th Floor
Chicago, Illinois 60601
312.861.4600
Attorney No. 35351

Jack Carey, Esq.
Attorney at Law
Attorney for Plaintiffs
23 S. First Street
Belleville, Illinois 62220
618-234-2424
Attorney No. 00388025

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

FILED

MAY 26 2009

Avon L. Reitz
CLERK OF THE CIRCUIT COURT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
MARIO D. WEISS as brother,)
uncle, and next best friend of)
SHERI COLEMAN, deceased, GARETT)
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)

Case No. 09-L- 14

Plaintiffs,)

vs.)

CHRISTOPHER COLEMAN,)

Defendant.)

and)

JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)

Respondent in Discovery,)

and)

RONALD COLEMAN,)

Respondent in Discovery.)

MOTION FOR SPECIAL ADMINISTRATOR
TO PROSECUTE WRONGFUL DEATH ACTION

Comes now Angela DeCicco, as mother, grandmother and next best friend to
Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman,

deceased, and Mario D. Weiss, as brother, uncle, and next best friend of Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, by and through their attorneys, Jack Carey, Attorney at Law, and Enrico J. Mirabelli, of Nadler, Pritikin & Mirabelli, LLC, and moves this court pursuant to 740 ILCS 180/0.01 etc. to appoint Angela DeCicco and Mario D. Weiss as Special Administrators to prosecute the wrongful death action for Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, and in support of this motion states:

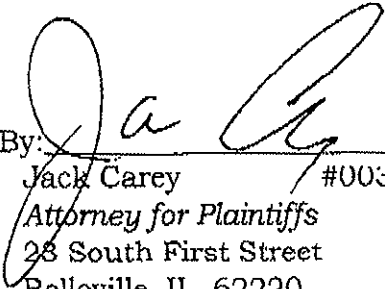
1. Sheri Coleman, Garrett Coleman, and Gavin Coleman died on May 5, 2009, and Plaintiffs' believe there is a cause of action against Defendant for the wrongful deaths of Sheri Coleman, Garrett Coleman, and Gavin Coleman.

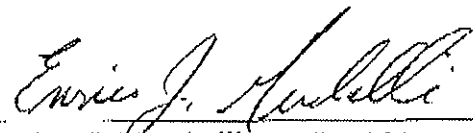
2. Petitioners are the decedent's mother, grandmother, brother and uncle and would be entitled to a recovery for the decedents' wrongful deaths.

3. No Petition for Letters of Office for the Estate of Sheri Coleman, Garrett Coleman, and Gavin Coleman, the deceased, have been filed, and this cause of action for the wrongful death of the decedents is the only asset of the estate.

WHEREFORE, the Petitioners, Angela DeCicco and Mario D. Weiss, respectfully moves this Court to appoint Angela DeCicco and Mario D. Weiss as Special Administrators for the purpose of prosecuting a cause of action for the wrongful death of Sheri Coleman, Garrett Coleman, and Gavin Coleman, deceased, and for such further Orders and the Court may deem just and proper.

ANGELA DECICCO, and
MARIO D. WEISS

By: 
Jack Carey #00388025
Attorney for Plaintiffs
28 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

By: 
Enrico J. Mirabelli #35351
Nadler, Pritikin & Mirabelli, LLC
Attorney for Plaintiffs
One Prudential Plaza
130 East Randolph Drive
Suite 1200
Chicago, IL 60601
(312) 861-4600
(312) 861-4666 FAX

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
MONROE COUNTY, ILLINOIS

FILED

MAY 26 2009

Arnon J. R...
CLERK OF THE CIRCUIT COURT
MONROE COUNTY, ILLINOIS

ANGELA DeCICCO, as mother,)
grandmother and next best)
friend to SHERI COLEMAN, deceased,)
GARETT COLEMAN, deceased and)
GAVIN COLEMAN, deceased, and)
MARIO D. WEISS as brother,)
uncle, and next best friend of)
SHERI COLEMAN, deceased, GARETT)
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)

Case No. 09-L- 14

Plaintiffs,)

vs.)

CHRISTOPHER COLEMAN,)

Defendant.)

and)

JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)

Respondent in Discovery,)

and)

RONALD COLEMAN,)

Respondent in Discovery.)

COMPLAINT

COUNT I

COMES NOW the Plaintiffs, Angela DeCicco, as mother, grandmother and next best friend to Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, and Mario D. Weiss, as brother, uncle, and next

best friend of Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, by and through their attorneys, Jack Carey, Attorney at Law, and Enrico J. Mirabelli, of Nadler, Pritikin & Mirabelli, LLC, and for Count I of their Complaint state:

1. On or about May 5, 2009, Sheri Coleman, Garrett Coleman, and Gavin Coleman died in their home at 2854 Robert Drive, Columbia, Illinois.
2. On May 26, 2009, Angela DeCicco and Mario D. Weiss were duly appointed as Special Administrators of the estates of Sheri Coleman, Garrett Coleman, and Gavin Coleman, deceased, and bring this action pursuant to the provisions of the Illinois Wrongful Death statute.
3. At all times herein mentioned, the decedents, Sheri Coleman, Garrett Coleman, and Gavin Coleman, were citizens and residents of Monroe County, Illinois, and were the lawful wife and children of Christopher Coleman.
4. At all times herein mentioned, Defendant, Christopher Coleman, was an individual living in Monroe County Illinois and owned and held multiple assets in Monroe County and other jurisdictions known solely to the Defendant.
5. At all times herein mentioned, the Defendant, Christopher Coleman, was guilty of causing the death of Plaintiff's daughter, grandchildren, and Plaintiff's sister and nephews.

6. As a direct and proximate result of the Defendant's conduct which caused the deaths of Plaintiffs' decedents, the Plaintiffs' decedents died and their next of kin have been permanently deprived of their love, companionship, society, support, guidance, and have incurred and become liable for large sums of money in burial expenses, all to their damage in a substantial amount.

WHEREFORE, Plaintiffs demand judgment in an amount greater than FIFTY THOUSAND DOLLARS (\$50,000.00), and assurances no individual will profit from Plaintiffs' decedents' deaths, plus costs of suit.

COUNT II

COMES NOW the Plaintiffs, Angela DeCicco, as mother, grandmother and next best friend to Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, and Mario D. Weiss, as brother, uncle, and next best friend of Sheri Coleman, deceased, Garrett Coleman, deceased, and Gavin Coleman, deceased, by and through their attorneys, Jack Carey, Attorney at Law, and Enrico J. Mirabelli, of Nadler, Pritikin & Mirabelli, LLC, and for Count II of their Complaint state:

1. On or about May 5, 2009, Sheri Coleman, Garrett Coleman, and Gavin Coleman died at their home at 2854 Robert Drive, Columbia, Illinois.
2. On May 26, 2009, Angela DeCicco and Mario D. Weiss were duly appointed as Special Administrators of the estates of Sheri Coleman, Garrett Coleman, and Gavin Coleman, deceased, and bring this action

pursuant to the provisions of the Illinois Wrongful Death statute.

3. At all times herein mentioned, the decedents, Sheri Coleman, Garrett Coleman, and Gavin Coleman, were citizens and residents of Monroe County, Illinois, and were the lawful wife and children of Christopher Coleman.
4. At all times herein mentioned, Defendant, Christopher Coleman, was an individual living in Monroe County Illinois and owned and held multiple assets in Monroe County and other jurisdictions known solely to the Defendant.
5. At all times herein mentioned, Defendant, Christopher Coleman is guilty of causing the deaths of the Plaintiffs' decedents by one or more of the following negligent acts or omissions:
 - a.) Negligently and carelessly failing to provide plaintiffs' decedents a safe place to live.
 - b.) Negligently and carelessly failing to protect plaintiffs' decedents from a dangerous condition when Defendant knew or should have known of the dangerous condition.
 - c.) Negligently and carelessly failed to protect Plaintiffs' decedents from an unreasonable risk of harm which Plaintiffs' decedents would neither discover nor appreciate and thus would be unable to seek protection.
6. As a direct and proximate result of the aforesaid negligent acts, omissions and carelessness of the Defendant as aforesaid, Plaintiffs' decedents died and their next of kin have been permanently deprived of

their love, companionship, society, support, guidance, and have incurred and become liable for large sums of money in burial expenses, all to their damage in a substantial amount.

WHEREFORE, Plaintiffs demand judgment in an amount greater than FIFTY THOUSAND DOLLARS (\$50,000.00), and assurances no individual will profit from Plaintiffs' decedents' deaths, plus costs of suit.

ANGELA DECICCO, and
MARIO D. WEISS

By: 

Jack Carey #00388025
Attorney for Plaintiffs
23 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

By: 

Enrico J. Mirabelli #35351
Nadler, Pritikin & Mirabelli, LLC
Attorney for Plaintiffs
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130 East Randolph Drive
Suite 1200
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IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
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ANGELA DeCICCO, as mother,)
grandmother and next best)
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GARETT COLEMAN, deceased and)
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SHERI COLEMAN, deceased, GARETT) Case No. 09-L-
COLEMAN, deceased, and GAVIN)
COLEMAN, deceased,)
)
Plaintiffs,)
)
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CHRISTOPHER COLEMAN,)
)
Defendant.)
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JOYCE MEYER MINISTRIES, INC.,)
a nonprofit organization,)
)
Respondent in Discovery,)
)
and)
)
RONALD COLEMAN,)
)
Respondent in Discovery.)

AFFIDAVIT

Comes now the Affiant, Jack Carcy, and upon his oath states:

1. The damages sought by the Plaintiffs exceed \$50,000 in the above-entitled cause.

FURTHER THE AFFIANT SAYETH NOT.

Jack Carey

Jack Carey #00388025
Attorney for Plaintiffs
23 South First Street
Belleville, IL 62220
(618) 234-2424
(618) 234-2470 Fax

STATE OF ILLINOIS)
) SS.
COUNTY OF ST. CLAIR)

Subscribed and sworn to before me this 25 day of May, 2009.

Julie M. Fietsam
Notary Public

