

27. As a result of the malicious prosecution, Plaintiff was deprived of liberty as set forth above.

28. The actions of Defendants in maliciously prosecuting Plaintiff constituted a violation of his rights under Illinois law to be free from malicious prosecution without probable cause and caused the injuries set forth above.

29. Defendants' actions in maliciously prosecuting Plaintiff were willful and wanton.

WHEREFORE, Plaintiff demands judgment against all Defendants for compensatory damages the costs of this action and whatever additional relief this Court deems equitable and just.

COUNT III

(Respondent Superior Claim-Defendant City of Chicago)

30. Plaintiff realleges paragraphs 1-29 with the same force and effect as if fully set forth herein.

31. The aforesaid acts and state law violations of Defendants Angsten and Ross, as set forth above, were performed in the scope of their employment as Chicago Police Officers, were willful and wanton, and therefore the Defendant City of Chicago as principal is liable for the actions of its agents under the doctrine of *respondeat superior* for the violations of state law.

WHEREFORE, Plaintiff demands judgment against the City of Chicago in the amount sought against the individual Defendants in their state claim.

COUNT V

(755 ILCS 10/9 102-Defendant City of Chicago)

32. Plaintiff realleges paragraphs 1-31 with the same force and effect as if fully set forth herein.

33. Defendant City of Chicago is the employer of the individual Defendants.