

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

<b>MONIQUE JORDAN and DORAN</b>	)	
<b>MYRICKES,</b>	)	
	)	<b>Case No.</b>
<b>Plaintiffs,</b>	)	
	)	<b>JURY DEMAND</b>
<b>v.</b>	)	
	)	
<b>LUXURY U.S., INC. d/b/a MANNY’S</b>	)	
<b>BLUE ROOM LOUNGE and IRVIN</b>	)	
<b>SMITH, Individually, NAKEEAH</b>	)	
<b>BUCHANAN SMITH, Individually,</b>	)	
<b>And the LAVERNE WILLIAMS AND</b>	)	
<b>EMANUAL WILLIAMS TRUST,</b>	)	
	)	
<b>Defendants.</b>	)	

**COMPLAINT AT LAW**

NOW COME the Plaintiffs MONIQUE JORDAN and DORAN MYRICKES, by and through their attorneys, GREGORY E. KULIS & ASSOCIATES, LTD., complaining against the Defendants, LUXURY U.S. INC. d/b/a MANNY’S BLUE ROOM LOUNGE and IRVIN SMITH, individually, and NAKEEAH BUCHANNON SMITH, individually, and the LAVERNE WILLIAMS AND EMANUAL WILLIAMS TRUST, as follows:

1. The Plaintiff, MONIQUE JORDAN, is an individual resident of Cook County, Illinois.
2. The Plaintiff, DORAN MYRICKES, is an individual resident of Cook County, Illinois.
3. The Defendant, LUXURY U.S., INC. is an Illinois Corporation which has been doing business as MANNY’S BLUE ROOM LOUNGE.
4. MANNY’S BLUE ROOM LOUNGE is a nightclub doing business at 2911 S. Claire Blvd., Robbins, Illinois.

5. The Defendant, IRVIN SMITH, was the manager of Manny's Blue Room Lounge and the husband of Nakeeah Buchanan Smith.

6. The Defendant, NAKEEAH BUCHANAN SMITH, is the owner of LUXURY U.S., INC., an Illinois corporation, which operated and manager MANNY'S BLUE ROOM LOUNGE.

7. Plaintiff DORAN MYRICKES was retained as security for the club with numerous other security officers. DORAN MYRICKES was paid cash.

8. MONIQUE JORDAN was a bartender, paid cash by Defendant IRVIN SMITH.

9. MANNY'S BLUE ROOM LOUNGE has had to retain numerous security officers on a regular basis because of the unsavory characters it allows in the club.

10. On November 10, 2018, DORAN MYRICKES was brought in as a special contractor security officer to work and was paid cash by Defendant IRVIN SMITH.

11. During the early morning hours of November 11, 2018, several unsavory characters were ejected from the club because of their use of gang signs and other actions and use of alleged illegal substances.

12. Several of those characters attempted to re-enter the club and were allowed in despite having caused trouble earlier that night.

13. Some of these same individuals had previously caused trouble in the club.

14. LUXURY U.S., INC. d/b/a MANNY'S BLUE ROOM LOUNGE and IRVIN SMITH allowed these individuals in the club because it was Saturday night, and they wanted their money, knowing there would be trouble.

15. LUXURY U.S. had a duty to run an establishment which was a safe environment for its patrons, clientele, employees, and security staff, and with proper licenses.

16. The Defendants, LUXURY U.S., INC. and IRVIN SMITH breached their duty and were negligent in one or more of the following:

- a. Allowed characters in the club they knew would confront and cause problems with other patrons.
- b. Allowed characters in the club that had previously caused trouble.
- c. Allowed characters in the club that had known gang affiliation.
- d. Allowed characters in the club to openly use illegal substances.
- e. Failed to have security check patrons for weapons.
- f. Failed to listen to and ignored security personnel who previously ejected individuals and had not wished to allow them to reenter.
- g. Failed to maintain a proper business license.
- h. Failed to maintain a state liquor license.
- i. Was otherwise negligent.

17. As a result of the Defendants' negligence one or more of these characters started a fight and DORAN MYRICKES was shot by one of the individuals who was previously ejected.

18. As a result of the Defendant's negligence, one or more of these characters started a fight and MONIQUE JORDAN was shot by one of the individuals who was previously ejected.

19. As a result of the acts and omissions of the Defendants the Plaintiffs MONIQUE JORDAN and DORAN MYRICKES suffered pain, anxiety, permanent injury, and monetary loss and expenses.

WHEREFORE the Plaintiffs MONIQUE JORDAN and DORAN MYRICKES pray for judgment against the Defendants LUXURY U.S., INC., and IRVIN SMITH, jointly and severally, in excess of fifty thousand dollars (\$50,000.00) plus costs.

**COUNT II: INTENTIONAL RECKLESS ENDANGERMENT**

1-13. The Plaintiffs hereby reallege their allegations of paragraphs 1-13 of Count I as their respective allegations of paragraph 1-13 of Count II as though fully set forth herein.

14. Defendants IRVIN SMITH and NAKKEEAH BUCHANAN SMITH are, or at the time of the incident were, husband and wife.

15. Defendants IRVIN SMITH and NAKKEEAH BUCHANAN SMITH operated and comanaged the club.

16. Defendants IRVIN SMITH and NAKKEEAH BUCHANAN SMITH intentionally and willfully ignored safety regulations, local ordinances, their lease requirements, and the safety of their patrons and workers.

17. Defendants IRVIN SMITH and NAKKEEAH BUCHANAN SMITH were intentionally reckless in causing endangerment to Plaintiffs MONIQUE JORDAN and DORAN MYRICKES in one or more of the following, but not limited to:

- a. Failing to maintain a local business license and comply with Robbins requirements.
- b. Failing to maintain a valid Illinois State Liquor License and adhere to state liquor requirements.
- c. Failing to maintain proper security personnel.
- d. Failing to listen to its security personnel.
- e. Allowed known violent gang members in the club.
- f. Allowed individuals to openly engage in illegal drug consumption in the establishment.
- g. Allowed illegal gambling in the club through a third party.

18. As a result of these intentional reckless acts by these Defendants, the Plaintiffs were injured.

19. The acts of these individuals were intentional, willful, and wanton.

20. As a result of these acts, the Plaintiffs suffered pain, anxiety, permanent injury, monetary loss, and future pain and suffering.

21. The Plaintiffs are entitled to punitive damages.

WHEREFORE, the Plaintiffs MONIQUE JORDAN and DORAN MYRICKES pray for compensatory and punitive damages against Defendants IRVIN SMITH and NAKKEEAH BUCHANAN SMITH, both individually and jointly and severally.

**COUNT III: NEGLIGENCE / LAVERNE WILLIAMS AND EMMANUEL WILLIAMS**

**TRUST**

1-13. The Plaintiffs hereby reallege their allegations of paragraphs 1-13 of Count I as their respective allegations of paragraph 1-13 of Count III as though fully set forth herein.

14. The Defendant, LAVERNE WILLIAMS AND EMMANUEL WILLIAMS TRUST at all relevant times was the owner of 2911 S. Claire Boulevard, Robbins, Illinois 60472 (Defendant Trust).

15. Defendants LUXURY U.S., INC. and IRVIN SMITH and NAKKEEAH BUCHANAN SMITH operated and managed MANNY'S BLUE ROOM LOUNGE pursuant to a lease agreement with Defendant Trust.

16. In operating the leasing property, Defendant Trust had knowledge and experience of running a night club at this location.

17. Defendant Trust failed to monitor its tenants' obligations under the lease or the requirements of the law.

18. Defendant Trust turned a blind eye to the goings on at its property.

19. Defendant Trust had a duty of care to make sure illegal activity was not being conducted and proper business was being operated at the property.

20. Defendant trust was negligent to the patrons, business invitees, and individuals who worked at Manny's Blue Room Lounge in one or more of the following:

- a. Failing to make sure its tenant had a proper business license and adhered to the local laws of Robbins.
- b. Failing to make sure its tenant had a proper Illinois Liquor License and adhered to the requirements of such.
- c. Allowed illegal gambling to take place at the premise, bringing unsavory patrons.
- d. Failing to make sure the business was properly staffed.
- e. Failing to make sure the tenant carried proper/adequate insurance.
- f. Failing to make sure the business establishment was operating in a safe manner.
- g. Was otherwise negligent.

21. As a result of its negligence, the Plaintiffs, MONIQUE JORDAN and DORAN MYRICKES, were injured.

22. As a result of tis negligence, the Plaintiffs suffered pain, injury, anxiety, monetary loss and expenses, permanent injuries, and future pain and suffering.

WHEREFORE, the Plaintiffs, MONIQUE JORDAN and DORAN MYRICKES, pray for judgement in excess of fifty thousand dollars (\$50,000.00) plus costs against the LAVERNE WILLIAMS AND EMMANUAL WILLIAMS TRUST.

**JURY DEMAND**

The Plaintiffs hereby request a trial by jury.

Respectfully submitted,  
MONIQUE JORDAN and DORAN  
MYRICKES,

By: /s/ Gregory E. Kulis  
One of Plaintiffs' Attorneys

**Gregory E. Kulis & Associates, Ltd.**  
**30 North LaSalle Street, Suite 2140**  
**Chicago, Illinois 60602-3368**  
**p. (312) 580-1830 / f. (312) 580-1839**  
**e. [gkulis@kulislawltd.com](mailto:gkulis@kulislawltd.com)**  
**Atty. No. 70798**