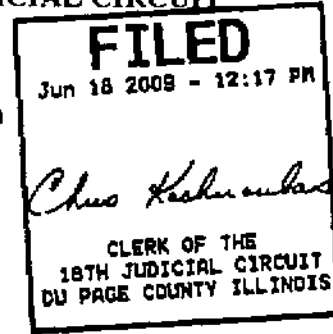


IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
DUPAGE COUNTY, ILLINOIS

2009L000766



ROBERT V. ROHRMAN,  
*Plaintiff,*

vs.

SAMI M. BITTAR,  
*Defendant*

)  
)  
) Status Date: 09/15/09  
) Mgmt Date: 12/07/09  
) Assigned To: 2020  
) Case No.  
)  
)  
)

COMPLAINT FOR ALIENATION OF AFFECTIONS

NOW COMES the Plaintiff, ROBERT V. ROHRMAN, by and through his attorney, ENRICO J. MIRABELLI of NADLER, PRITIKIN & MIRABELLI, LLC, and pursuant 740 ILCS 5/1 *et. seq.* complains of injuries and resulting damages against Defendant, SAMI M. BITTAR, and in support thereof, respectfully states as follows:

1. That on or about December 28, 2002, Plaintiff, ROBERT V. ROHRMAN (hereinafter referred to as "ROBERT"), married RONDA KAY ROHRMAN (hereinafter referred to as "RONDA") in a lavish wedding ceremony in Kauai, Hawaii.
2. That on or about June 23, 2008, ROBERT filed a Petition for Dissolution of Marriage in Tippecanoe County, in the State of Indiana.
3. That on or about April 29, 2009, RONDA filed a Petition for Dissolution of Marriage in DuPage County, in the State of Illinois.
4. That since the date of ROBERT and RONDA's marriage up until the filing of ROBERT's Petition for Dissolution of Marriage, ROBERT and RONDA lived together as husband and wife.
5. That ROBERT was at all times a loving and affectionate husband to RONDA throughout the parties' marriage.

6. That RONDA was at all times a loving and affectionate wife to ROBERT throughout the parties' marriage.

7. That ROBERT and RONDA enjoyed a happy marriage.

8. That ROBERT has supported RONDA throughout the pendency of the marriage, providing for her a luxurious lifestyle.

9. That though ROBERT and RONDA had no biological children of their own, ROBERT has supported RONDA's two (2) adult children from a previous relationship throughout the pendency of ROBERT and RONDA's marriage, providing for them a luxurious lifestyle.

10. That Defendant, SAMI M. BITTAR (hereinafter referred to as "SAMI"), is a plastic surgeon practicing in DuPage County, Illinois.

11. That both ROBERT and RONDA met SAMI when a family member was undergoing a plastic surgery in early 2008.

12. That SAMI had knowledge of RONDA's marriage to ROBERT.

13. That despite SAMI's knowledge of RONDA's marriage to ROBERT, SAMI solicited and initiated a romantic and sexual relationship with RONDA.

14. That beginning on or about April of 2008, SAMI committed certain overt acts and conduct, including but not limited to:

- a. Purchasing expensive gifts for RONDA;
- b. Taking RONDA on dates to expensive restaurants;
- c. Engaging in sexual relations with RONDA on multiple occasions and in multiple locations;

- d. Contacting RONDA on her cellular telephone on a continuous basis, for the purpose of initiating sexual relations and romantic rendezvous with RONDA;
- e. Contacting RONDA via electronic mail on a continuous basis for the purpose of initiating sexual relations and romantic rendezvous with RONDA; and
- f. Encouraging RONDA to spend time away from ROBERT and with SAMI.

15. That SAMI's conduct was done with knowledge of ROBERT and RONDA's marriage and with the calculated objective to undermine the sanctity of said marriage.

16. That as a direct result of the overt acts and conduct of SAMI toward RONDA, who was otherwise happily married to ROBERT, ROBERT and RONDA's marital relationship has undergone an irretrievable breakdown, resulting in the aforementioned Petition for Dissolution of Marriage.

17. That as a direct result of the overt acts and conduct of SAMI toward RONDA, who was otherwise happily married to ROBERT, RONDA's previous love and affections for ROBERT departed permanently.

18. That SAMI's overt acts and conduct are the proximate cause of actual damages to ROBERT, said damages include, but are not limited to, the following:

- a. Loss of RONDA's potential income as a wife; and
- b. Amounts to be paid to private investigator for services used to uncover infidelity of RONDA.

WHEREFORE, Plaintiff, ROBERT V. ROHRMAN, respectfully prays of this Honorable Court for:

- A. The entry of a Judgment against Defendant, SAMI M. BITTAR for alienation of affections, in the amount of not less than \$50,000.00 plus costs; and
- B. Such other relief as this Court deems just and equitable.

Respectfully submitted,

  
ENRICO J. MIRABELLI

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