

12-Person Jury

FILED  
11/25/2019 8:10 AM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2019L012935

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

TOM WILDER and LUCIA MORALES, )  
as Parents and Next Friend )  
of RYLAN WILDER, a minor, )  
 )  
Plaintiffs, )  
v. )  
 )  
MAURICE MURPHY, )  
 )  
Defendant. )

7489347

No. 2019L012935

*Plaintiffs Demands Trial by Jury*

**COMPLAINT AT LAW**

NOW COMES the Plaintiffs, TOM WILDER and LUCIA MORALES, as Parents and Next Friend of RYLAN WILDER, a minor, by and through their attorneys, CAVANAGH LAW GROUP, and complaining against Defendant, MAURICE MURPHY, allege as follows:

1. On and before November 19, 2019, and at all relevant times, RYLAN WILDER was a fifteen (15) year old young man, living with his parents and attending Lane Tech High School.

2. On and before November 19, 2019, and at all relevant times, RYLAN WILDER was an intern working at UpBeat Music and Arts located at 4318 W. Irving Park Road in the City of Chicago, County of Cook, State of Illinois; RYLAN WILDER worked 4:00 p.m. until 7:15 p.m. every Tuesday. His responsibilities included welcoming patrons to the business, walking students to their classrooms, opening the door for customers and cleaning classrooms.

FILED DATE: 11/25/2019 8:10 AM 2019L012935

3. On and before November 19, 2019, and at all relevant times, RYLAN WILDER worked at UpBeat Music and Arts due to his love of music. RYLAN WILDER was also lead guitarist and vocalist for Monarchy Over Monday.

4. On and before November 19, 2019, and at all relevant times, Bank of America operated a branch located at 1300 E. Oakton Street, City of Des Plaines, County of Cook, State of Illinois.

5. On or before November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, hatched a plan with Christopher Willis to commit an armed robbery of the Bank of America branch located at 1300 E. Oakton Street.

6. On or before November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, agreed to act as the getaway driver once the pair robbed the Bank of America branch at 1300 E. Oakton.

7. On or before November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, traveled from his home in Chicago to Des Plaines, Illinois with a firearm with the intention of committing an armed bank robbery with Christopher Willis.

8. On November 19, 2019, at approximately 4:30 p.m., Defendant MAURICE MURPHY, and Christopher Willis entered the Bank of America branch at 1300 E. Oakton brandishing firearms and demanding bank employees turn over United States currency using the threat of harm and/or the imminent use of force.

9. On November 19, 2019, and at all relevant times, Defendant MAURICE MURPHY and Christopher Willis subsequently exited the Bank of America branch with approximately \$15,500 in stolen cash and left the scene of the crime.

10. On November 19, 2019, and at all relevant times, yet unknown officers from the Des Plaines Police Department responded to the scene of the bank robbery and placed Defendant, MAURICE MURPHY, under arrest.

11. On November 19, 2019, and at all relevant times, and after the arrest of Defendant, MAURICE MURPHY, Christopher Willis fled and committed an armed carjacking.

12. On November 19, 2019, and at all relevant times, Christopher Willis then led officers from the Des Plaines Police Department, the Chicago Police Department and other yet unknown law enforcement agencies on a high-speed car chase for approximately eleven (11) miles through various jurisdictions on the Kennedy Expressway, eventually exiting at Irving Park Road in Chicago, Illinois.

13. On November 19, 2019, and at all relevant times, while fleeing from police in a stolen vehicle, Christopher Willis traveled at dangerous speeds and drove in a reckless manner placing all those around him in danger of being seriously injured.

14. On November 19, 2019, and at all relevant times, after exiting the Kennedy expressway at Irving Park Road, Christopher Willis headed westbound in the stolen vehicle eventually coming to a stop at or near UpBeat Music and Arts sometime after 6:36 p.m.

15. On November 19, 2019, and at all relevant times, RYLAN WILDER was finishing his shift at Upbeat Music and Arts and taking the garbage from the front lobby of the business when he observed through the window many police cars speed down Irving Park Road.

16. On November 19, 2019, and at all relevant times, a co-worker “Katie” from UpBeat Music and Arts exited the business and went out the front door; RYLAN WILDER continued his end of shift duties.

17. On November 19, 2019, and at all relevant times, “Katie” frantically rushed back to UpBeat Music and Arts, trying to get in the front door and a parent of a student buzzed her in.

18. On November 19, 2019, and at all relevant times, as “Katie” rushed in the front door, Christopher Willis ran into the business with a weapon in hand as the front door was closing shut.

19. On November 19, 2019, and at all relevant times, Christopher Willis ran past RYLAN WILDER, brandishing a firearm in his hand.

20. Upon seeing Christopher Willis, RYLAN WILDER intended to exit the business.

21. On November 19, 2019, and at all relevant times, yet unknown suburban police officers came into UpBeat Music and Arts and started firing their weapons as RYLAN WILDER was intending to exit the business.

22. On November 19, 2019, and at all relevant times, RYLAN WILDER was shot in the left arm and left side of his abdomen reportedly by a Des Plaines police officer per the Chicago Police Department.

23. On November 19, 2019, and at all relevant times, subsequent to being shot, RYLAN WILDER, ran into an adjoining room in the building and saw that his pants and shoes were drenched in blood.

24. On November 19, 2019, and at all relevant times, RYLAN WILDER went from the adjoining room into the front ensemble room which was occupied by approximately five (5) students and a teacher “Eric.”

25. On November 19, 2019, and at all relevant times, “Eric” led the five (5) students and RYLAN WILDER from the building and took cover behind a parked car.

26. On November 19, 2019, and at all relevant times, RYLAN WILDER was transported to Lurie Children’s Hospital where he has undergone numerous surgeries to his abdomen and left arm.

27. RYLAN WILDER continues to have bone shards in his left arm that are not repairable.

28. RYLAN WILDER may never fully recover from his injuries and will likely never regain full use of his injured arm.

29. On November 19, 2019, and at all relevant times, during transport to Lurie Children’s Hospital, RYLAN WILDER was in fear he might die.

30. On November 19, 2019, and at all relevant times, LUCIA MORALES requested that TOM WILDER pick up RYLAN from UpBeat Music and Arts at the completion of RYLAN’s shift that evening.

31. On November 19, 2019, and at all relevant times, TOM WILDER was headed to UpBeat Music and Arts to pick up RYLAN when he was stopped by officers at Irving Park Road and not permitted to pass through.

32. On November 19, 2019, and at all relevant times, both TOM WILDER and LUCIA MORALES attempted to call and text RYLAN to determine his well-being with no success.

33. On November 19, 2019, and at all relevant times, LUCIA MORALES and RYLAN WILDER exchanged the following text messages:

RYLAN at 6:36 p.m.: “Could you pick me up at 7:15 please?”

LUCIA: “Yes, daddy will pick you up. He wants to see how the mini is running. 🥰”

RYLAN: “Cool, thanks! 🥰”

LUCIA at 7:25 p.m.: “Hey is everything OK? Dad’s trying to get there, but everything is blocked off by police.”

LUCIA: “He keeps trying to call you, but you’re not answering.”

34. On November 19, 2019, and at all relevant times, TOM WILDER exited his vehicle several blocks away UpBeat Music and Arts and ran towards the location.

35. On November 19, 2019, and at all relevant times, TOM WILDER received a phone call from a Chicago Fire Department paramedic who informed TOM WILDER that RYLAN had been shot.

36. TOM WILDER and LUCIA MORALES then rushed to Lurie Children’s Hospital to see RYLAN.

37. RYLAN WILDER’s injuries include:bullet wounds to his left arm and abdomen.

38. On November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, knew or should have been aware that his actions of aiding and abetting in and/or committing a bank robbery could lead to further acts of violence involving innocent bystanders, including RYLAN WILDER.

39. On November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, knew or should have been aware that aiding and abetting in and/or committing an armed bank robbery endangered the general welfare of the public at large, including RYLAN WILDER.

40. On November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, knew or should have been aware that aiding and abetting in and/or committing an armed bank robbery would lead to a large police response which endangered the general welfare of the public at large, including RYLAN WILDER.

41. On November 19, 2019, and at all relevant times, Defendant, MAURICE MURPHY, knew or should have been aware that aiding and abetting in and/or committing a bank robbery while being armed with a firearm would lead to a large police response which endangered the general welfare of the public at large, including RYLAN WILDER.

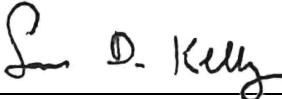
42. On November 19, 2019, Defendant, MAURICE MURPHY, was guilty of one or more of the following intentional acts:

- a. Agreed to participate in a bank robbery putting the lives of innocent people at risk;
- b. Carried a firearm on his person while committing a forcible felony, putting the lives of innocent people at risk;
- c. Committed an armed robbery in violation of 720 ILCS 5/18-2, putting the lives of innocent people at risk;
- d. Committed Armed Violence in violation of 720 ILCs 5/33A-2, putting the lives of innocent people at risk; and
- e. Committed a Bank Robbery in violation of 18 U.S. Code § 2113.

43. As a direct result of the above intentional acts and conduct of the Defendant, MAURICE MURPHY, RYLAN WILDER sustained injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiffs, TOM WILDER and LUCIA MORALES, as Parents and Next Friend of RYLAN WILDER, a minor, demand judgment against the Defendant, MAURICE MURPHY, for a sum in excess of the jurisdictional limits of the Law Division of the Circuit Court of Cook County, plus the costs of this case.

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