

IN THE CIRCUIT COURT OF COOK COUNTY,  
COUNTY DEPARTMENT, CHANCERY DIVISION

FILED - 1  
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COURT CLERK  
COROBY BROWN - CL

NAVY PIER, INC.,  
Plaintiff,

v.

INTERNATIONAL BROTHERHOOD OF  
TEAMSTERS, LOCAL 727, JOHN T. COLI  
JR., AND JOHN T. COLI SR.,  
Defendants.

Case No.

2017CH07379  
CALENDAR/ROOM 13  
TIME 00:00  
Injunction

**COMPLAINT AND  
PETITION FOR INJUNCTIVE RELIEF**

Navy Pier, Inc. ("NPI") respectfully asks the Court to grant a Temporary Restraining Order and preliminary and permanent injunctive relief against Defendants the International Brotherhood of Teamsters Local 727, John T. Coli Jr., and John T. Coli.

**INTRODUCTION**

1. Navy Pier is Illinois's most popular tourist attraction and, with over 80 tenants, is one of the top-visited leisure and cultural destinations in the world. Navy Pier showcases the vitality of Chicago and is a place where Chicagoans and visitors from around the world come to shop, dine, go to the theater or trade show, view the skyline, ride the Ferris Wheel, see the lake and be out and about. The upcoming Memorial Day weekend is one of the busiest and most important weekends of the year for the Pier and the numerous stores, vendors, attractions, and restaurants that populate the Pier and is the beginning of the Pier's busy summer season.

2. For the past week, Teamsters Local 727 members have been standing in the street, physically blocking delivery trucks, buses and other vehicles that seek access to the Pier under the guise of a "labor dispute" with a contractor that provides security services to Navy Pier. When a delivery truck attempts to turn on Grand Avenue to access the Pier, Local 727 members literally stand in the street, in front of the truck, forcing it to stop. They then surround the cab and

harangue and coerce the driver in an attempt to stop the driver from coming into Navy Pier. Meanwhile, vehicles behind the delivery truck are stopped and blocked from entering the Pier. Local 727 members also park their personal vehicles in cross walks and in the narrow, no-parking lanes that lead to Navy Pier to block and impede incoming traffic. As a result, they create unsafe and hazardous conditions to vehicle and foot traffic, and they have jeopardized the operation of the Pier and the numerous businesses that operate on the Pier, none of which have any dispute with Local 727. Local 727's efforts to block access to the Pier are unlawful and unjustified and should be immediately enjoined, prior to the start of the Memorial day weekend and the kickoff to the summer tourist season.

3. To be clear, NPI is not seeking to stop Local 727 from engaging in peaceful, lawful picketing. What it seeks to enjoin is Local 727 from physically blocking the streets leading into Navy Pier with their persons, their vehicles or any other objects.

### **THE PARTIES**

4. NPI is a private 501(c)(3) organization that operates and manages Chicago's Navy Pier and Headlands area under a lease agreement with the Metropolitan Pier and Exposition Authority. NPI is based in and conducts business in Cook County, Illinois.

5. Navy Pier is a commercial, entertainment and tourist venue that is unique in the Midwest. The Pier's attractions include numerous restaurants and shops; the Chicago Children's Museum; an IMAX theater; commercial passenger boats; an indoor botanical garden; the Skyline Stage; Pier Park, which contains a Ferris wheel, carousal, and wading pool/ice skating rink; Festival Hall, a convention, trade show and meeting facility; the Shelter and Terminal Buildings, which are historical structures housing meeting and facilities and the Grand Ballroom; and the South Dock, an outdoor promenade with concessions and entertainment that runs along the Pier's

south side. NPI strives to ensure that visitors encounter a fun, pleasant atmosphere conducive to shopping, dining, and other recreational options provided by its tenants.

6. By attracting visitors to the City and State, NPI's tourist, convention and trade show activities at Navy Pier provide significant benefits to the economies of both the City of Chicago and the State of Illinois, and produce substantial local and state tax revenues.

7. NPI, the City of Chicago, and the entire state of Illinois have a substantial financial interest in maintaining the Pier as an attractive and safe destination for Chicago residents and visitors alike, and in avoiding disruption of the commercial and entertainment activities taking place at the Pier.

8. NPI has a substantial interest in maintaining a free and orderly flow of traffic into and out of Navy Pier facilities. The Pier poses unique emergency and crowd control challenges because it is a long narrow structure bounded on three sides by water with only two egress points. Given this configuration, and given that as many 85,000 people visit Navy Pier daily, safety and traffic flow is a constant challenge. As described below, the Teamsters' unlawful conduct has rendered NPI incapable of effectively ensuring efficient and safe entrance to Navy Pier without this Court's assistance.

9. International Brotherhood of Teamsters Local 727, is a local union of the International Brotherhood of Teamsters, Chauffeurs, Warehousemen and Helpers of America. It is headquartered in Park Ridge, Illinois and conducts its activity within Cook County, Illinois.

10. John T. Coli, Jr. is President of Local 727; John T. Coli is Secretary and Treasurer of Local 727.

## LOCAL 727'S ILLEGAL CONDUCT

11. On May 18, 2017, Local 727 began picketing on public sidewalks and streets that serve as the sole routes of pedestrian and vehicle access to Navy Pier and the Headlands as part of a labor dispute with Allied Universal, Inc., the security vendor at Navy Pier.

12. Allied was recently retained by NPI to provide security services on Navy Pier as a result of a Request for Proposal issued by NPI to select the most qualified and cost effective security services for Navy Pier. Local 727 represents employees of the company that previously provided security services at Navy Pier. Under the terms of the RFP, Allied must employ qualified former full-time employees represented by Local 727 if they pass Allied's drug and background check process. Members of Local 727, rather than utilizing this application process, have instead resorted to physically blocking entry by delivery vehicles and other vehicles and unlawful intimidation of the numerous visitors to Navy Pier that have no connection or relationship to Allied, the employer with which they have the purported labor dispute.

13. Since Thursday, May 18, 2017, Defendants' picketing activity has blocked ingress and egress at Navy Pier, impeding the flow of traffic, barring the entry and exit paths of vehicles, and obstructing delivery trucks and tour buses from entering and leaving Navy Pier. Defendants have accomplished this through the imposition of human bodies and illegally parked vehicles in public streets at the entrance to Navy Pier.

14. The Teamsters' unlawful activities have violated NPI's right to the use of its property, as well as the rights of those attempting to enter and exit NPI facilities. Defendants' actions also have created safety hazards on the streets adjacent to NPI property. In addition, Defendants' illegal picketing has created situations which endanger the public at large.

15. NPI has notified the Chicago Police Department of Defendants' activities. However, Defendants have persisted in impeding access to Navy Pier.

16. As a result of the actions described above, NPI is suffering, and will continue to suffer, irreparable damage.

17. If the Teamsters' unlawful acts are permitted to continue, NPI will continue to be deprived of unobstructed ingress and egress to its property and of the right to conduct its own business and business with other persons lawfully entitled to be upon its premises.

18. NPI has no adequate remedy at law. The damages and injuries which NPI has suffered, is suffering and will continue to suffer unless the illegal acts and conduct of Defendants are restrained and enjoined, are incapable of definite ascertainment as required by law. Moreover, the delays incident in obtaining relief by way of an action at law would result in serious and irreparable damage to NPI's business before relief can be obtained.

19. NPI will suffer further irreparable injury and damage as a result of the illegal acts and conduct of the Defendants unless a temporary restraining order is issued by this Court, restraining and enjoining Defendants from continuing its illegal acts and conduct pending a hearing for a preliminary injunction.

20. The over 80 attractions, theaters, vendors, restaurants and bars that operate on Navy Pier are being irreparably harmed because Local 727 is preventing the delivery of necessary supplies such as food and beverages. This harm will be particularly devastating if Local 727's conduct is not enjoined prior to the Memorial Day weekend, one of the busiest weekends of the year for Navy Pier and the start of the busy summer season. NPI has a direct interest in preventing this harm, as the NPI's own future and financial interests are tied directly to those of Navy Pier tenants and vendors.

21. The requested injunctive relief will not deprive Defendants of any legal right and will in no way cause Defendants any loss, injury or damage. They have no right to stand in the

middle of the street, block traffic, or force large vehicles to stop in "No Parking" areas which results in the blockage of access to Navy Pier.

22. Based on the foregoing, emergency conditions exist which justify the hearing of this Complaint and Petition without providing 48 hours prior notice of hearing to the Defendants.

WHEREFORE, NPI respectfully requests:

1. That a temporary restraining order be issued by this Court, restraining and enjoining, pending the hearing of this cause and until the further order of this Court, Teamsters Local 727 and their officers (including the two individual Defendants), agents, members, employees and all persons in active concert or participation with them, from:

(a) Physically, through the use of their own bodies, vehicles, or other items, blocking any portion of Grand Avenue, Illinois Street, or Streeter Drive in a manner that impedes or prevents access to Navy Pier.

(b) Parking any vehicle in a No Parking zone on Grand Avenue, Illinois Street, Streeter Drive, or taking any action to direct, command or encourage any vehicle to park or stop on any of these streets or in any No Parking zone on these streets.

(c) Having or allowing any more than two picketers at any point along the streets leading to Navy Pier or at any entrance to Navy Pier or the Headlands, and that the picketers remain on the perimeter of the streets or entrances; provided, however, that the picketers may cross the streets at normal, uninterrupted speed so long as ingress and egress is not blocked or delayed, and so long as picketers shall not place themselves or objects in front of vehicles entering or leaving Navy Pier.

(d) Endangering public safety by delaying and blocking traffic on the streets and entrances to Navy Pier and the corresponding thoroughfares.

2. That a writ of injunction embodying the terms of the order requested above, be issued immediately from this Court.

3. That the Chicago Police Department be directed to enforce the terms of any order of this Court.

4. That NPI be granted further relief as this Court deems just and appropriate.

Respectfully submitted,

NAVY PIER, INC.

By:   
One of Its Attorneys

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Firm I.D. No. 31593

Dated: May 24, 2017

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that he caused a true and correct copy of the foregoing **COMPLAINT AND PETITION FOR INJUNCTIVE RELIEF** to be served upon the following individuals by email and messenger delivery on this 24th day of May, 2017:

International Brotherhood of Teamsters, Local 727  
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William R. Pokorny