

December 3, 2025

**APPROVE PAYMENT OF PROPOSED SETTLEMENT REGARDING  
JANE DOE V. BOARD OF EDUCATION AND BRIAN CROWDER  
CASE NO. 2024 L 004023**

**THE ACTING GENERAL COUNSEL REPORTS THE FOLLOWING SETTLEMENT:**

**DESCRIPTION:** Subject to court approval, the Board and Plaintiff, Jane Doe, through her counsel, Gould, Grieco & Hensley, have reached a settlement disposing of all claims against the Board in Case No. 2024 L 004023, filed on April 12, 2024, in the Circuit Court of Cook County. The settlement amount is \$17.5 million inclusive of all fees and costs, with \$10 million dollars payable by the Board and \$7.5 million payable by its insurance carriers.

Subject to court approval, additional settlement terms will include the following:

**Attorneys' Fees and costs:** Attorneys' fees and costs are included as part of the settlement and are subject to the retainer agreement between Plaintiff and her counsel.

**Release of Claims:** The Plaintiff, Jane Doe, will execute a release of claims against the Board, its employees, and agents.

**Non-Admission:** The Board specifically denies that it is legally liable for the claims and the agreement is entered by the Board solely to conclude protracted and costly litigation and to mitigate financial risk to the Board and the taxpayers.

**Expedited payment:** The Board must submit its payment within 30 days following Board approval.

**LSC REVIEW:** LSC approval is not applicable to this report.

**AFFIRMATIVE ACTION STATUS:** None.

**FINANCIAL:** Charge a total of \$10,000,000.00 as described above to the Law Department.

Budget Classification Fiscal Year 2026 ..... 12460-210

**AUTHORIZATION:** Authorize the Acting General Counsel to negotiate all settlement terms other than the Board-approved settlement amount, to execute the Settlement Agreement and all ancillary documents related thereto and take all actions necessary to implement the terms of the Settlement Agreement.

**GENERAL CONDITIONS:**

**Inspector General** – Each party to the agreement shall acknowledge that, in accordance with 105 ILCS 5/34-13.1, the Inspector General of the Chicago Board of Education has the authority to conduct certain investigations and that the Inspector General shall have access to all information and personnel necessary to conduct those investigations.


**Conflicts** – The agreement shall not be legally binding on the Board if entered into in violation of the provisions of 105 ILCS 5/34-21.3 which restricts the employment of or the letting of contracts to, former Board members during the one year period following expiration or other termination of their terms of office.

**Indebtedness** – The Board's Indebtedness Policy adopted June 26, 1996 (96-0626-PO3), as amended from time to time shall be incorporated into and made a part of the agreement.

**Ethics** – The Board's Ethics Code adopted August 24, 2023 (23-0824-PO2), as amended from time to time, shall be incorporated into and made a part of the agreement.

Contingent Liability – The agreement shall contain the clause that any expenditure beyond the current fiscal year is deemed a contingent liability, subject to appropriation in the subsequent fiscal year budget(s).

APPROVED,

Signed by:  
  
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ELIZABETH K. BARTON  
Acting General Counsel

Initial  
