

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

FRANK HANEY, in his individual capacity, SCOTT ANDERSON, RICHARD CROSBY, ED GEESER, JAN MANSFIELD, DAVID DALE JOHNSON, JOHANNA KOSLOFSKI, DEE PREMO, KEVIN HORTSMAN, SARAH PIPITONE, ANTHONY PIPITONE, DENNIS GREIER, JUDY GREIER, GERRY MILLER, CAROL MILLER, BECKY ECKER, MARK BEAULIEU, JANICE BUTITTA, JIM BUTITTA, JODI AMANS, JACKIE SCIORTINO, KEITH THOMPSON, BRENDAN BLACKLER, LORRAINE BLACKLER, KRISTIN DIXON, LESLIE HANEY, MARILYN PALADINO, JOHN PALADINO, NICK PALADINO, DOM GRISANZIO, BARB BETTS, BRENDA CHRISTIANSEN, KEN CHRISTIANSEN, PATRICIA ALMS, GARY ALMS, BILL GELSHEN, JANETTE GRISANZIO, VITO GRISANZIO, MICHAEL GRISANZIO, PHYLLIS GRISANZIO, FRANK GIAMMARESE, ROBERT HANEY, MARY JO HANEY, WILLIAM GEHLSSEN, MARY KAY GEHLSSEN, DOMINIC PALADINO, JENNIFER LAVASSEUR and BRIAN MAIER,

Plaintiff,

v.

WINNEBAGO COUNTY BOARD, THE COUNTY OF WINNEBAGO, DAVID BOOMER, in his official capacity, DAVE FIDUCCIA, in his official capacity, JOE HOFFMAN, in his official capacity, FRED WESCOTT, in his official capacity, JIM WEBSTER, in his official capacity, JAMIE SALGADO, in his official capacity, ANGIE GORAL, in her official capacity, DOROTHY REDD, in her official capacity, DAVE TASSONI, in his official capacity, BURT GERL, in his official capacity, STEVE SCHULTZ, in his official capacity, KEITH MCDONALD, in his official capacity, and PAUL ARENA, in his official capacity,

Defendants.

No.

VERIFIED COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

Plaintiffs FRANK HANEY, SCOTT ANDERSON, RICHARD CROSBY, ED GEESER, JAN MANSFIELD, DAVID DALE JOHNSON, JOHANNA KOSLOFSKI, DEE PREMO, KEVIN

HORTSMAN, SARAH PIPITONE, ANTHONY PIPITONE, DENNIS GREIER, JUDY GREIER, GERRY MILLER, CAROL MILLER, BECKY ECKER, MARK BEAULIEU, JANICE BUTITTA, JIM BUTITTA, JODI AMANS, JACKIE SCIORTINO, KEITH THOMPSON, BRENDAN BLACKLER, LORRAINE BLACKLER, KRISTIN DIXON, LESLIE HANEY, MARILYN PALADINO, JOHN PALADINO, NICK PALADINO, DOM GRISANZIO, BARB BETTS, BRENDA CHRISTIANSEN, KEN CHRISTIANSEN, PATRICIA ALMS, GARY ALMS, BILL GELSHEN, JANETTE GRISANZIO, VITO GRISANZIO, MICHAEL GRISANZIO, PHYLLIS GRISANZIO, FRANK GIAMMARESE, ROBERT HANEY, MARY JO HANEY, WILLIAM GEHLSSEN, MARY KAY GEHLSSEN, DOMINIC PALADINO, JENNIFER LAVASSEUR and BRIAN MAIER, by their attorneys, Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd. and Daniel Law Office, P.C., and for their Verified Complaint against Defendants WINNEBAGO COUNTY BOARD, THE COUNTY OF WINNEBAGO, DAVID BOOMER, DAVE FIDUCCIA, JOE HOFFMAN, FRED WESCOTT, JIM WEBSTER, JAMIE SALGADO, ANGIE GORAL, DOROTHY REDD, DAVE TASSONI, BURT GERL, STEVE SCHULTZ, KEITH MCDONALD, and PAUL ARENA states as follows:

Introduction

1. Plaintiffs Frank Haney, Scott Anderson, Richard Crosby, Ed Geeser, Jan Mansfield, David Dale Johnson, Johanna Koslofski, Dee Premo, Kevin Hortzman, Sarah Pipitone, Anthony Pipitone, Dennis Greier, Judy Greier, Gerry Miller, Carol Miller, Becky Ecker, Mark Beaulieu, Janice Butitta, Jim Butitta, Jodi Amans, Jackie Sciortino, Keith Thompson, Brendan Blackler, Lorraine Blackler, Kristin Dixon, Leslie Haney, Marilyn Paladino, John Paladino, Nick Paladino, Dom Grisanzio, Barb Betts, Brenda Christiansen, Ken Christiansen, Patricia Alms, Gary Alms, Bill Gelshen, Janette Grisanzio, Vito Grisanzio, Michael Grisanzio, Phyllis Grisanzio, Frank Giammarese, Robert Haney, Mary Jo Haney, William Gehlsen, Mary Kay Gehlsen, Dominic Paladino, Jennifer Lavasseur and Brian Maier seek redress for unlawful acts by Defendants in violation of 42 U.S.C. § 1983; Ill. Const. 1970, art. I, § 3; and Ill. Const. 1970, art. III. Plaintiffs seek declaratory and injunctive relief as well as damages for their injuries.

Jurisdiction

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1367.

3. Venue is proper under 28 U.S.C. §1391(b). The events giving rise to the claims asserted herein occurred in this judicial district, the individual Defendants all reside in this district, and the Defendants, Winnebago County Board and the County of Winnebago, are located in this judicial district.

The Parties

4. Frank Haney (“Haney”) is the Chairman of the Winnebago County Board (“Chairman”). Haney was a registered voter in the November 8, 2016 election for Chairman of the Winnebago County Board (the “Election”). On November 8, 2016, and at all times relevant to the Election, Haney was a resident of Winnebago County, State of Illinois.

5. Scott Anderson, Richard Crosby, Ed Geeser, Jan Mansfield, David Dale Johnson, Johanna Koslofski, Dee Premo, Kevin Hortsman, Sarah Pipitone, Anthony Pipitone, Dennis Greier, Judy Greier, Gerry Miller, Carol Miller, Becky Ecker, Mark Beaulieu, Janice Butitta, Jim Butitta, Jodi Amans, Jackie Sciortino, Keith Thompson, Brendan Blackler, Lorraine Blackler, Kristin Dixon, Leslie Haney, Marilyn Paladino, John Paladino, Nick Paladino, Dom Grisanzio, Barb Betts, Brenda Christiansen, Ken Christiansen, Patricia Alms, Gary Alms, Bill Gelshen, Janette Grisanzio, Vito Grisanzio, Michael Grisanzio, Phyllis Grisanzio, Frank Giammarese, Robert Haney, Mary Jo Haney, William Gehlsen, Mary Kay Gehlsen, Dominic Paladino, Jennifer Lavasseur and Brian Maier (“Citizen Plaintiffs”) were registered voters in the Election and on November 8, 2016, and at all times relevant to the Election, were residents of Winnebago County, State of Illinois.

6. The County of Winnebago is an Illinois unit of local government (the “County”).

7. The Winnebago County Board is made up of 20 members not voted on at-large, but, rather, voted on in individual county board districts (the “Board”).

8. The Chairman is a non-member of the Board, and the position is voted for at large by voters in the entire County.

9. David Boomer, Dave Fiduccia, Joe Hoffman, Fred Wescott, Jim Webster, Jamie Salgado, Angie Goral, Dorthy Redd, Dave Tassoni, Burt Gerl, Steve Schultz, Keith McDonald, and Paul Arena are County residents and members of the Board.

10. All individual Defendants are sued solely in their official capacities.

Factual Background

11. In Winnebago County, the electorate votes for the position of Chairman countywide, while the electorate votes for Board members by districts within the County.

12. The Chairman was elected with over 60,000 votes in the November 2016 election, after running on a platform of government reform highlighted through his ACT Initiative.

13. Some of the reform efforts the Chairman ran on include:

a. Implementing anti-nepotism policies that extended to the Chairman's Office and County Board members;

b. Implementing a number of transparency initiatives and increased communication with the Board and public, especially in regards to financial and budget matters;

c. Supporting reduction in mid-year reserve spending, changes to host fee spending, and advocating against investing county incentives on retail-related development projects;

d. Developing public and private partnerships related to regional planning, blight reduction and neighborhood revitalization, workforce development, youth outreach, and public safety;

e. Revamping the outdated, closed, and overly political appointment process when an elected official does not finish his or her term;

f. Supporting an overhaul of multiple county departments, including but not limited to, Animal Services as well as the Purchasing Department, which experienced a highly publicized embezzlement case and its former purchasing director going to prison;

14. Since Haney was elected as Chairman, he has attempted to implement these reforms and other reforms of Winnebago County government.

15. Haney's efforts to implement reform have been thwarted by a majority of the Board segment of the Board through the passage of ordinances that, midterm, eliminate the authority and powers of the Chairman position, which have existed for over 25 years. The Chairman position functionally no longer existed on the organizational chart, copies of the charts showing before and after the ordinance changes are attached as Exhibit A.

16. Several ordinances were passed after Haney was elected into office that restrict or eliminate executive functions and executive powers that reside with the Office of Chairman:

a. On June 22, 2017, the Board passed Ordinance 2017-CO-067, which changed that the Chairman cannot terminate the County Administrator and CFO without Board approval. Prior to this Ordinance the Chairman has sole authority regarding the employment status of these positions. This was the first in a series of changes that provided an avenue for a few Board members to, when taken to an extreme, triangulate, undercut and undermine Haney in "leading the effective administration of the county."

b. On November 21, 2017, the Board passed Ordinance 2017-CO-110, which removed the requirement that the County Administrator be a resident of the County if certain qualifications are met. It also allows the County Administrator to appoint his or her designee to assist in the supervision of the County departments he or she oversees rather than the Chairman doing so.

c. On July 26, 2018, the Board passed Ordinance 2018 CO-075. This represented a sweeping shift of organizational authority from the Chairman to the County Administrator. The view of this matter by the head of the Civil Division of the State's

Attorney's Office has shifted overtime. At first, it was theoretically explained as merely a delegation of a duty to a person who reported to the Chairman meaning that final say would always reside with the Chairman. In practice, this midterm change represented a shift of authority to the County Administrator in a manner that would completely exclude the Chairman from engaging in or having final say on duties that resided with the Chairman position for 25 years. This change impacted a range of duties, including appointment and dismissal of department heads, union negotiations, and other financial duties. This action, coupled with the January 24, 2019 ordinance change and the March 28, 2019 ordinance change, essentially removed the Chairman from the organizational chart, both figuratively and literally.

d. On January 24, 2019, the Board passed Ordinance 2019-CO-005, which removed the Chairman's authority and power to supervise, direct and control the County Administrator and instead placed such authority and power with the Board and placed additional County departments solely under control by the Administrator. Additionally, it removed the ability of the Chairman to assign other duties to the County Administrator and gave this power to the Board. The Chairman position functionally no longer existed on the organizational chart.

This midterm change was planned for several months over private email and was forecasted in a series of text messages. Having open, transparent discussions about the merits of this change proved extremely difficult. This midterm power shift completely fractured the day to day working environment between the Chairman and those directly involved in driving the change. Engagement and information sharing by staff to the Chairman on core issues like budget, policy development, and partnership development became almost non-existent overnight. Practically speaking, this change ensured the Chairman's executive authority no longer existed and the position existed as

a de-facto lobbyist outside the organization, one that also had no legislative authority as a member of the Board.

The ability to impact discussions and outcomes of consequence to the citizens who voted in November of 2016 is crippled. The County Administrator began reporting to 20 Board members with no process for the Board to direct the non-elected employee outside of the two week long ordinance and resolution process. The result of this midterm change resulted in a non-elected person having considerably more access and ability to impact virtually all outcomes, as compared to 20 elected Board members and the Chairman position combined, but with less accountability than ever before. Functionally speaking, the set-up remains unlike any other county government in the state. Multiple Board members, remarked, although in the minority view, that this change was retaliation over a policy disagreement on a recent appointment of the open State's Attorney position and an economic development project. As is not uncommon on high profile issues, both items sparked much debate on the Board and in the community.

e. On March 28, 2019, the Board passed Ordinance 2019-CO-040, which amends certain sections of the Winnebago County Code of Ordinances to strip considerable executive authority from the Chairman. These changes include, but are not limited to, removing the power of the Chairman to oversee, hire, and fire the County Administrator, as well as remove the Chairman's ability to recommend a budget, participate in short-term planning and negotiate any economic or other operational agreements. There is no other instance of midterm changes of this magnitude to an elected official's position taking place in any other of the 101 counties. It is without precedent.

17. The Board continues to try to pass ordinances that strip duties and responsibilities from Haney. On July 25, 2019, the Chairman was presented with two new ordinances for approval. The first ordinance amends Section 2-168 of the Winnebago County Code of

Ordinances to allow the Chief of Human Resources or the County Administrator to recommend, appoint, discipline or dismiss the Human Resource Director or for the Board to perform these functions in their absence. The second ordinance amends Section 2-89 of the Winnebago County Code of Ordinances to remove the Chairman's duties of appointing, re-appointing and reviewing department heads annually and gives the County Administrator with the advice and consent of the Board the duty to appoint or re-appoint department heads for positions not mentioned in the Winnebago County Code of Ordinances or in state statute. Additionally, the responsibility of performing annual reviews of the department heads is given to the County Administrator and two Board members.

18. On February 12, 2019, the State's Attorney sent a letter to Haney informing him that she believes the Board is correct in prohibiting him from speaking at Board meetings.

19. The position of Chairman has been under endless threat of change over the past two years. The majority of the Board has repeatedly placed limitations on Haney's position. The enacted changes have constructively terminated the position of County Chairman by severely limiting the authority of Haney, re-assigning the Chairman responsibilities, for which he was elected, to the County Administrator who is an unelected employee, and restricted the Chairman's and Haney's authority to speak at Board meetings about pending Ordinances and further to perform his statutory and constitutional duties.

20. The changes implemented by the Board have come in retaliation to Haney's actions to reform County government, Haney's speaking out against the Board's recent actions, and/or Haney's election at the November 2016 election. Haney has been vocal about reforms that need to be passed in order to eliminate unethical conduct and improve transparency in Winnebago County government. The Chairman has spoken out against "the old guard" government and that he hopes to have more inclusion and diversity in government.

21. Ordinance 2019-CO-040, along with multiple other actions of the Board, have restricted the duties and responsibilities of Haney, and removed important checks and balances

in government without the consent of the electorate via referendum. Further, the actions disregard the will of the voters, who elected Haney, county-wide, and do not allow Haney to perform the functions vested to him by law in the Office of Chairman.

Count I
Section 1983 – Fourteenth Amendment
Denial of Equal Protection – Right to Vote

22. Plaintiffs restate and re-allege by reference paragraphs 1 through 21 above as though fully set forth herein.

23. Haney and Citizen Plaintiffs had a Fourteenth Amendment right to equal protection of their vote.

24. Legislation that affects any state of the election process that deprives a vote of its natural and intended effect implicates the right to vote.

25. Equal protection rights are violated when through arbitrary and disparate treatment one person's vote is given more value than that of another.

26. Haney and Citizen Plaintiffs were registered voters in the Election and voted for Haney to be elected Chairman.

27. After the Chairman was elected, Haney and Citizen Plaintiffs' votes were nullified by the various ordinances that stripped the Chairman of his duties and responsibilities for which he was elected. The ordinances establish a total disregard for all the votes cast by citizens in the Election and constructively terminated Haney and the Chairman position midterm, without cause.

28. The ordinances have the effect of nullifying the result of a valid election and effectively remove Haney, whom the citizens elected to serve, midterm. Even though Haney received the majority of the vote cast, with over 60,000 votes in the Election, the Board constructively terminated Haney and the Chairman position preventing him from essentially holding office for the term for which he was elected.

WHEREFORE, Plaintiffs Frank Haney and Citizen Plaintiffs pray that this Court:

- A. Declare the following Ordinances illegal and unconstitutional and of no force and effect: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005; and
- C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
- D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- E. Grant such further and other relief as this Court deems just and proper.

Count II
Violation of Ill. Const. 1970, art. III: Right to Vote

29. Plaintiffs restate and re-allege by reference paragraphs 1 through 28 above as though fully set forth herein.

30. Article III of the Illinois State Constitution protects the fundamental right to vote.

31. Legislation that affects any state of the election process that deprives a vote of its natural and intended effect implicates the right to vote.

32. Haney and Citizen Plaintiffs were registered voters in the Election and voted for Haney to be elected Chairman.

33. After Haney was elected, Haney and Citizen Plaintiffs' votes were nullified by the various ordinances that stripped Haney of his duties and responsibilities for which he was elected. The ordinances establish a total disregard for all the votes cast by citizens in the Election and constructively removed Haney from his position midterm, without cause.

34. The ordinances have the effect of nullifying the result of a valid election and effectively remove Haney, whom the citizens elected to serve, midterm. Even though Haney received the majority of the vote cast, with over 60,000 votes in the Election, he is effectively being prohibited from holding office for the term for which he was elected.

WHEREFORE, Plaintiffs Frank Haney and Citizen Plaintiffs pray that this Court:

- A. Declare the following Ordinances illegal and unconstitutional and of no force and effect: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005; and
- C. Grant such further and other relief as this Court deems just and proper.

Count III

Section 1983 – First Amendment Retaliation – Freedom of Speech

35. Plaintiffs restate and re-allege by reference paragraphs 1 through 34 above as though fully set forth herein.

36. The First Amendment protects an elected official's right to speak out on matters of public concern.

37. The Defendants' actions reflect a policy, custom, or pattern of official conduct of engaging in and condoning retaliation against individuals who speak out on matters of public concern:

- a. Because of their political or perceived political affiliations;
- b. Because of their perceived position against the administration and its allies;
- c. Because they have complained about matters of public concern and taken action to reform matters of public concern; and/or

- d. Approving and/or condoning malicious and unwarranted actions for retaliatory reasons.

38. The Defendants acted under color of law, misused their authority and position with the County, and retaliated against Plaintiff for speaking out about matters of public concern such as governmental and ethical reforms that need to be passed, Board actions or policy disagreements and intentionally subjected Haney to unequal and retaliatory treatment by passing various ordinances after the Haney was elected that stripped Haney of his duties and responsibilities, restricted Haney's ability to speak at Board meetings, and constructively terminated his position.

39. The Defendants agreed, and participated, in these wrongful acts despite knowing that the stripping of Haney's duties and responsibilities, restricting Haney's ability to speak at Board meetings, and constructively terminating his position was baseless and motivated by the Defendants' desire to retaliate against Haney for his protected First Amendment activities.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
- D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- E. Grant such further and other relief as this Court deems just and proper.

Count IV
Section 1983 – Fourteenth Amendment – Substantive Due Process

40. Plaintiffs restate and re-allege by reference paragraphs 1 through 40 above as though fully set forth herein against all Defendants.

41. An elected official that is entitled to hold office under state law has a property interest in that office.

42. When a statute provides that an elected official shall serve for a certain period of time and shall only be removed in certain circumstances, there is an expectation that the elected official will serve for that time period and only be removed for cause.

43. Haney is an elected official that is entitled to hold office under 55 ILCS 5/2-3007 and Winnebago County Code of Ordinances, art. II, § 2-46 for a period of four years. The four year term commences on the first Monday of the month following the election and continues until his successor is elected and qualified.

44. As Haney is an elected official that is entitled to hold office under state law, Haney has a property interest in the Office of Chairman.

45. As there is no cause for the Board to remove Haney from office midterm, the Defendants acted under color of law and violated Haney's right to due process by passing various ordinances after Haney was elected to office that stripped Haney of his duties and responsibilities to such a degree and extent that that the position of Chairman was constructively terminated. As a result, Haney was left with the title of Chairman but unable to perform the functions and that he was validly elected to perform.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
 - B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
 - C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
 - D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions;
- and

E. Grant such further and other relief as this Court deems just and proper.

Count V
Section 1983 – Fourteenth Amendment – Procedural Due Process

46. Plaintiffs restate and re-allege by reference paragraphs 1 through 46 above as though fully set forth herein against all Defendants.

47. An elected official that is entitled to hold office under state law has a property interest in that office.

48. When a statute provides that an elected official shall serve for a certain period of time and shall only be removed in certain circumstances, there is an expectation that the elected official will serve for that time period and only be removed for cause.

49. Haney is an elected official that is entitled to hold office under 55 ILCS 5/2-3007 and Winnebago County Code, art. II, § 2-46 for a period of four years. The four year term commences on the first Monday of the month following the election and continues until his successor is elected and qualified.

50. As Haney is an elected official that is entitled to hold office under state law, Haney has a property interest in the Office of Chairman.

51. Before Haney may be deprived of his property interest in his office, he must be afforded due process.

52. Haney was deprived of his property interest in his office through various ordinances that were passed after he was elected that stripped Haney of his duties and responsibilities and constructively terminated his position.

53. The Defendants acted under color of law and violated Haney's right to due process by not providing him with notice and not affording him an opportunity to present his objections before he was deprived of his protected right to office.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

A. Order Defendants to reinstate Plaintiff to the position for which he was elected;

- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
- D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- E. Grant such further and other relief as this Court deems just and proper.

Count VI
Section 1983 – Fourteenth Amendment
Denial of Equal Protection – Class of One

54. Plaintiffs restate and re-allege by reference paragraphs 1 through 54 above as though fully set forth herein against all Defendants.

55. Haney has a Fourteenth Amendment right to equal protection.

56. The Defendants acted with malice when they passed at least five ordinances over the past two and a half years that single out Haney in an attempt to strip away all of his duties and responsibilities, restrict his ability to speak at Board meetings and constructively terminate his position within the County. There is no conceivable legitimate purpose for the Defendants' behavior and it is a clear deviation from the duties and responsibilities delegated to past Chairman.

57. Haney's duties and responsibilities were stripped, his ability to speak at Board meetings was restricted, and he was constructively terminated for speaking out about government reform, actions of the Board, or policy disagreements with the Board when similarly situated past Chairmen who committed the same or worse conduct did not have their duties or responsibilities stripped, were not restricted in their ability to speak at Board meetings or have their position constructively terminated.

58. The Defendants acted under color of law, misused their authority and position with the County, and acted with intent and animus to deprive Haney of equal protection of the laws guaranteed to him under the Fourteenth Amendment when they passed various ordinances stripping Haney of his duties and responsibilities, restricting the Haney's ability to speak at Board meetings, and constructively terminated his position, but similarly situated past Chairmen who had committed the same or worse conduct were not treated like Haney.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
- D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- E. Grant such further and other relief as this Court deems just and proper.

Count VII
Common Law Retaliation

59. Plaintiffs restate and re-allege by reference paragraphs 1 through 59 above as though fully set forth herein.

60. Haney voiced his opinion on government reform, actions of the Board and policy disagreements with the Board.

61. Against public policy, the Defendants retaliated against Haney for voicing his opinions on these issues by passing various ordinances that stripped him of his duties and responsibilities, restricted his ability to speak at Board meetings, and constructively terminated the position that he was elected for.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 for prosecuting this claim;
- D. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- E. Grant such further and other relief as this Court deems just and proper.

Count VIII
Violation of Ill. Const. 1970, art. I, § 3: Substantive Due Process

62. Plaintiffs restate and re-allege by reference paragraphs 1 through 63 above as though fully set forth herein against all Defendants.

63. An elected official that is entitled to hold office under state law has a property interest in that office.

64. When a statute provides that an elected official shall serve for a certain period of time and shall only be removed in certain circumstances, there is an expectation that the elected official will serve for that time period and only be removed for cause.

65. Haney is an elected official that is entitled to hold office under 55 ILCS 5/2-3007 and Winnebago County Code, art. II, § 2-46 for a period of four years. The four year term commences on the first Monday of the month following the election and continues until his successor is elected and qualified.

66. As Haney is an elected official that is entitled to hold office under state law, Haney has a property interest in that office.

67. As there is no cause for the Board to remove Haney from office midterm, the County violated Haney's right to due process when the County, through various ordinances that were passed after Haney was elected to office, stripped Haney of his duties and responsibilities and constructively terminated his position.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- D. Grant such further and other relief as this Court deems just and proper.

Count IX
Violation of Ill. Const. 1970, art. I, § 3: Procedural Due Process

68. Plaintiffs restate and re-allege by reference paragraphs 1 through 69 above as though fully set forth herein against all Defendants.

69. An elected official that is entitled to hold office under state law has a property interest in that office.

70. When a statute provides that an elected official shall serve for a certain period of time and shall only be removed in certain circumstances, there is an expectation that the elected official will serve for that time period and only be removed for cause.

71. Haney is an elected official that is entitled to hold office under 55 ILCS 5/2-3007 and Winnebago County Code, art. II, § 2-46 for a period of four years. The four year term commences on the first Monday of the month following the election and continues until his successor is elected and qualified.

72. As Haney is an elected official that is entitled to hold office under state law, Haney has a property interest in that office.

73. Before Haney may be deprived of his property interest in his office, he must be afforded due process.

74. Haney was deprived of his property interest in his office through various ordinances that were passed after he was elected that stripped Haney of his duties and responsibilities and constructively terminated his position.

75. The County violated Haney's right to due process by not providing him with notice and affording him an opportunity to present his objections before he was deprived of his protected right to office.

WHEREFORE, Plaintiff Frank Haney prays that this Court:

- A. Order Defendants to reinstate Plaintiff to the position for which he was elected;
- B. Permanently enjoin the enforcement of the following Ordinances: 2019-CO-040; 2017-CO-035; 2017-CO-058; 2017-CO-110; 2018-CO-060; 2018-CO-061; 2018-CO-062; 2018-CO-075; 2018-CO-136; 2019-CO-003; 2019-CO-005;
- C. Award Plaintiff actual damages he suffered as a result of the County's illegal actions; and
- D. Grant such further and other relief as this Court deems just and proper.

Respectfully submitted,

Frank Haney and Citizen Plaintiffs

By: /s/ Kenneth M. Florey
One of their attorneys

Kenneth M. Florey
M. Neal Smith
ROBBINS, SCHWARTZ, NICHOLAS, LIFTON & TAYLOR, LTD.
2990 N. Perryville Rd, Suite 4144B
Rockford, IL 61107-6814
Phone: 815.390.7090
Fax: 630.783.3231
kflorey@robbins-schwartz.com
nsmith@robbins-schwartz.com

Mark Daniel
Daniel Law Office, P.C.
17W733 Butterfield Road, Unit F
Oakbrook Terrace, IL 60181
Phone: 630.833.3311
mark@thedaniellawoffice.com

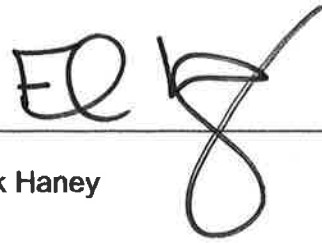
VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he has read the forgoing Verified Complaint; and that based upon his personal knowledge, he believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Executed this 9 day of August, 2019.

By: _____

Frank Haney

A handwritten signature in black ink, appearing to be 'FH' followed by a stylized 'g' or 'h' with a long vertical stroke extending downwards.

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By Brenda CHRISTIANSEN 8/11/2019 | 2:41 PM PDT
E0F13950BEFD435...

[Insert]

Brenda Christiansen

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By: Ken Christiansen 8/11/2019 | 2:42 PM PDT
E0F13950BEFD435...

[Insert]

Ken Christiansen

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11th day of August, 2019.

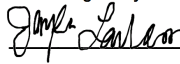
BRIAN MAIER
By: Brian Maier

[Insert]

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By:  8/11/2019 | 12:47 PM PDT
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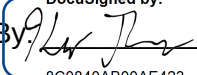
[Insert]

Jennifer Lee Lavasseur

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By 
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8/11/2019 | 12:05 PM PDT

[Insert]

Keith Thompson

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By: Jodi Amans JA 8/11/2019 | 6:04 AM PDT
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[Insert]

Jodi Amans

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

DocuSigned by:
By: Jim Butitta 8/11/2019 | 5:53 AM PDT
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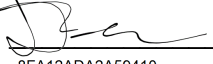
[Insert]

Jim Butitta

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

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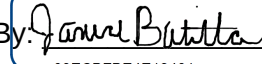
[Insert]

Dom Grisanzio

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

DocuSigned by:
By: 
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8/10/2019 | 7:06 PM PDT

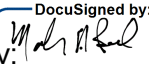
[Insert]

Janice Butitta

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

DocuSigned by:
By: 
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8/10/2019 | 3:23 PM PDT

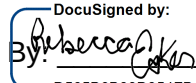
[Insert]

Mark Beaulieu

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

DocuSigned by:

D565B6B88D354FB... 8/10/2019 | 2:26 PM PDT

[Insert]

Becky Ecker

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

DocuSigned by:
By: Jan Mansfield 8/10/2019 | 3:44 PM
77C87B1AF610494...

[Insert]

Jan Mansfield

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

DocuSigned by:
By:  8/10/2019 | 10:31 AM PDT
6099F979A8094FA...

[Insert]

Kevin Horstman

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9 day of August, 2019.

DocuSigned by:
By: Johanna Koslofski 8/9/2019 | 2:26 PM P
539B6FA4BB8F44A...

[Insert]

Johanna Koslofski

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9 day of August, 2019.

9921D099E02941A
By: *David Dale Johnson*
DocuSigned By: David Dale Johnson

8/9/2019 | 1:33 PM

[Insert]

David Dale Johnson

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9th day of August, 2019.

By: 

[Insert]

Robert Scott Anderson

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9 day of August, 2019.

DocuSigned by:
By: Richard J Crosby 8/9/2019 | 1:55 PM PDT
B457EE5848804D6...

[Insert]

Richard J Crosby

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this _____ day of August, 2019.

DocuSigned by:
By Jackie Sciortino 8/11/2019 | 7:10 AM PDT
DF15FFDB21BA4A1...

[Insert]

Jackie Sciortino

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this _____ day of August, 2019.

DocuSigned by:
By: Dolores A. Premo
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8/10/2019 | 8:34 AM

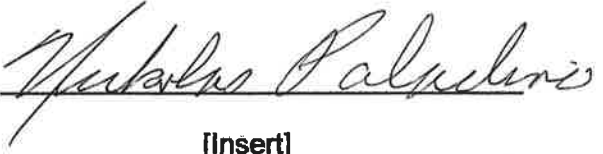
[Insert]

Dee Premo

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

By: 
[Insert]
NICKOLAS PALADINO

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

By: 
Gary Alms

VERIFICATION

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Executed this 11 day of August, 2019.

By: Patricia A. Alms
Patricia A. Alms

VERIFICATION

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Executed this 10TH day of August, 2019.

By: Brendan Blackler

[Insert]

BRENDAN T. BLACKLER

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he has read the forgoing Verified Complaint; and that based upon his personal knowledge, he believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Executed this 10TH day of August, 2019.

By: Lorraine Blackler

~~Frank Haney~~

Lorraine Blackler

VERIFICATION

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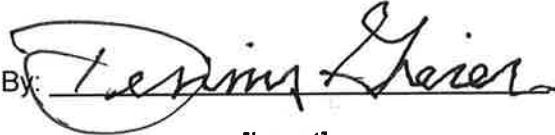
Executed this 10 day of August, 2019.

By: Judy Greier
[Insert]
Judy Greier

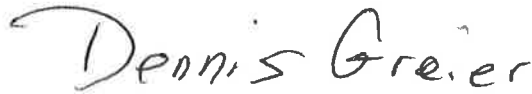
VERIFICATION

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Executed this 10 day of August, 2019.

By: 

[Insert]



VERIFICATION

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Executed this 10th day of August, 2019.

By: Carol S. Miller

[Insert]

Carol S. Miller

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10th day of August, 2019.

By: Gerald L. Miller

[Insert]

Gerald L. Miller

VERIFICATION

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Executed this 9th day of August, 2019.

By: Krist Dixon
Kristin Dixon
[Insert]

VERIFICATION

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Executed this 10th day of August, 2019.

By: Dominic A. Paladino

[Insert]

Dominic A. Paladino

VERIFICATION

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Executed this 9 day of August, 2019.

By: Leshe Haney
[Insert]
Leshe Haney

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9th day of August, 2019.

By: John P Paladino
[Insert]
JOHN P PALADINO

VERIFICATION

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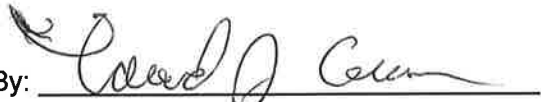
Executed this 9 day of August, 2019.

By: Marilyn J. Paladino
[Insert]
MARILYN J Paladino

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10th day of August, 2019.

By: 

[Insert]

Edward J. Geeser

VERIFICATION

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Executed this 11th day of August, 2019.

By: Barbara D. Betts

[Insert]
Barbara D. Betts

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

By: 

Anthony ^[Insert] Pipitone

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

By: Sarah Pipitone

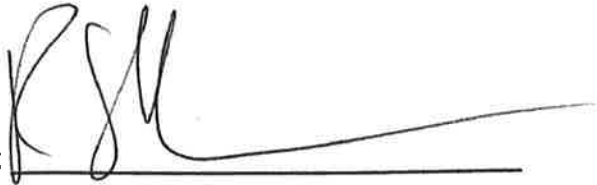
[Insert]

Sarah Pipitone

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 9th day of August, 2019.

By: 

[Insert]

Robert Scott Anderson

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11th day of August, 2019.

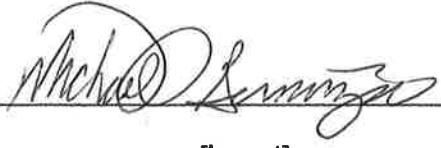
BRIAN MAIER
By: Brian Maier

[Insert]

VERIFICATION

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Executed this 11 day of August, 2019.

By: 
[Insert]

VERIFICATION

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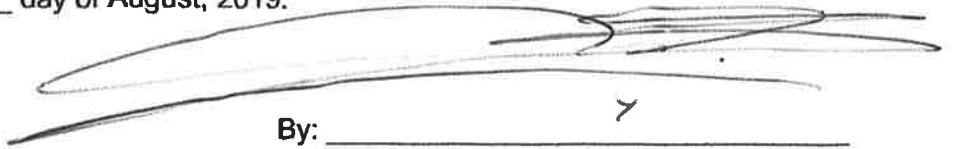
Executed this 11 day of August, 2019.

By: Phyllis Grisanzio
[Insert]
Phyllis Grisanzio

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10th day of August, 2019.


By: _____

 [Insert]
Frank N. Ciammrese

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10 day of August, 2019.

By: Vito Grisanzio

[Insert]

Vito Grisanzio

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 10th day of August, 2019.

By: Tamette Grisanzio

[Insert]

Tamette Grisanzio

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11 day of August, 2019.

Robert M. Haney
By: Robert M. Haney
[Insert]

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he has read the forgoing Verified Complaint; and that based upon his personal knowledge, he believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Executed this 11 day of August, 2019.

By: Mary Jo Haney
Frank Haney MARY JO HANEY

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11th day of August, 2019.

By: 

[Insert]

W. Gehlsen.

VERIFICATION

Under penalties of perjury under the laws of the United States, the undersigned certifies that he/she has read the forgoing Verified Complaint; and that based upon his/her personal knowledge, he/she believes all statements contained therein to be true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Executed this 11th day of August, 2019.

By: Mary Kay Gehlsen

[Insert]

Mary Kay Gehlsen

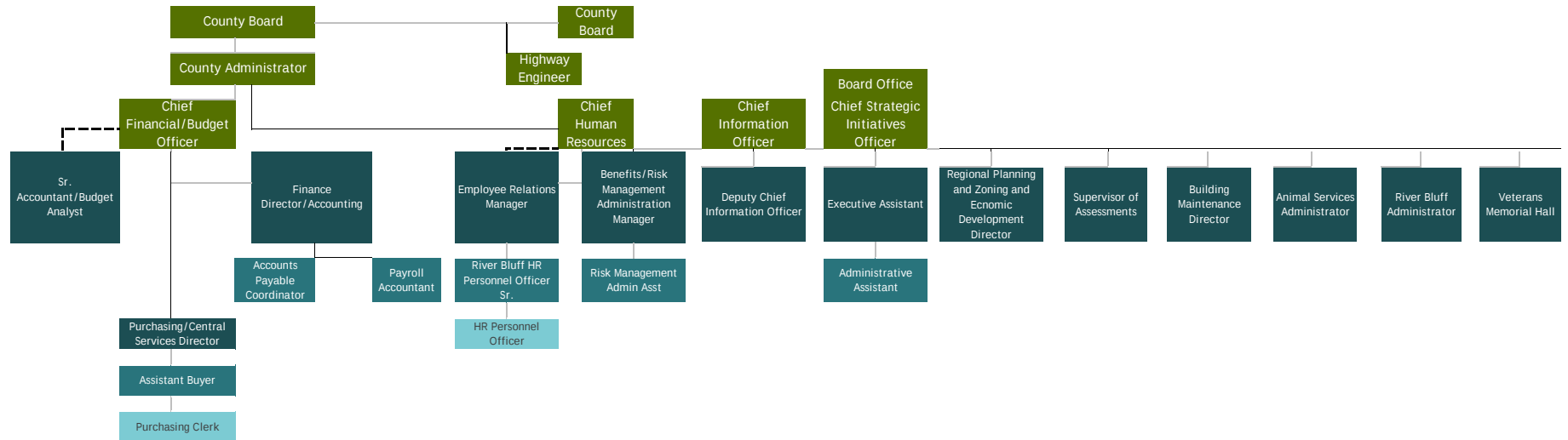
EXHIBIT A



Winnebago County Government Departments



Winnebago County Organizational Chart



Winnebago County Organizational Chart

