IN THE CIRCUIT COURT
FOR THE FOURTH JUDICIAL CIRCUIT
CLAY COUNTY, ILLINOIS

Darren Bailey	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2020-CH-06
	)	
Governor Jay Robert Pritzker, in his official capacity.	)	
	)	
Defendant.	)	

LEGAL BRIEF IN SUPPORT OF DARREN BAILEY'S MOTION FOR SUMMARY JUDGMENT

COMES NOW Plaintiff, Darren Bailey, (hereinafter "Bailey") by and through his attorneys, Thomas G. DeVore, Erik Hyam, and DeVore Law Offices, LLC, and provides this memorandum in support of his cause, and hereby states:

INTRODUCTION

1. Bailey readily recognizes COVID-19 is a serious public health matter which has required a concerted effort to combat and protect our state's public health interest.
2. Bailey's objection to Governor Pritzker's ("Pritzker") efforts lies not solely with the efficacy of the unilateral decisions being made, but more with the blatant usurping of long-standing legislative solutions which were already in place to manage such public health emergencies.
3. These long-standing legislative solutions enacted to protect the public health include numerous statutory procedural and substantive due process protections to preserve our people's individual liberties during these trying times, which intentionally or not, have been absolutely shredded by the executive branch over the last two months.

4. Bailey acknowledges that on March 09, 2020, COVID-19 constituted an occurrence or threat, which rose to the level of a disaster, as it required at that time emergency measures to try and avert a public health emergency, all as defined in Section 4 of the IEMAA.
5. As of the filing of his Motion for Summary Judgment, Bailey offers no facts in dispute that as of the filing of Proclamation #3 on April 30, 2020 a public health emergency which originated on March 09, 2020 still existed.
6. The issue of whether or not a public health emergency existed on April 30, 2020 is but a red-herring to deflect from the substantive matters actually present in this cause.
7. Bailey contends the operative provisions of the IEMAA have been perverted by the executive office to wield emergency powers far in excess of the legislative grant to address any such public health emergency.
8. As a direct result of the unilateral action of Pritzker in response to COVID-19, our state and local economies have been devastated and many good people have lost their livelihoods.
9. The economic and societal costs resulting from Pritzker's arbitrary decisions will have far reaching impacts lasting a generation or more.
10. Thousands of businesses Pritzker deemed non-essential have been forced to close their doors and many are staring at the stark reality of financial ruin.
11. Our citizens wake up each day and must determine if their free will has been restrained by Pritzker's list of essential activities.
12. It is undeniable a public health emergency such as this presents challenges to government, businesses and individuals, but these challenges demand a balancing of the public health with all individual's God-given rights, and not just for those who have been arbitrarily

deemed essential by an administrative agency, which agency determination of essentiality was beyond the purview of the watchful public eye.

13. The rule of law forged by our forefathers, and maintained by the sacrifices of millions of patriots in our history, cannot be cast aside during times of crisis, as it is these very times when the rule of law is needed to protect our people.

14. Each of Bailey's three counts for declaratory judgment are matters for which justice requires a timely resolve via summary judgment.

15. There are no issues of material fact in either of the three causes.

16. The facts and circumstances in the public record speak for themselves.

17. Each of the three matters which the Court is being asked to resolve only require a review of the public records, all of which were attached as exhibits in this cause:

18. When the Court reviews all of these documents and relevant statutes, and applies current legal precedent, Bailey avers that summary judgment should be granted in his favor on all three counts.

LEGAL FRAMEWORK OF STATUTORY INTERPRETATION

19. The cardinal rule of statutory construction, to which all other canons and rules are subordinate, is to ascertain and give effect to the true intent and meaning of the legislature. *People v. Boykin* (1983), 94 Ill.2d 138, 141, 68 Ill.Dec. 321, 445 N.E.2d 1174, *quoting People ex rel. Hanrahan v. White* (1972), 52 Ill.2d 70, 73, 285 N.E.2d 129.)

20. In determining the legislative intent, courts should consider first the statutory language. *Boykin*, 94 Ill.2d at 141.

21. Unambiguous terms, when not specifically defined, must be given their plain and ordinary meaning. *Hayes v. Mercy Hospital & Medical Center* (1990), 136 Ill.2d 450, 455, 145 Ill.Dec. 894, 557 N.E.2d 873.

22. The courts presume that the General Assembly, in passing legislation, did not intend absurdity, inconvenience, or injustice and a statute will be interpreted so as to avoid a construction which would raise doubts as to its validity. *Harris v. Manor Healthcare Corp.*, 489 N.E.2d 1374, 111 Ill.2d 350, 95 Ill.Dec. 510 (Ill. 1986)

23. The courts also will avoid a construction of a statute which would render any portion of it meaningless or void. *Id.*

24. Under accepted and established rules of statutory construction, when more than one act might apply to a situation, the more specific provisions prevail over the more general ones in cases of conflict. *Winnebago County v. Davis*, 509 N.E.2d 143, 156 Ill.App.3d 535, 108 Ill.Dec. 717 (Ill. App. 1987); *Board of Education v. Carter* (1983), 119 Ill. App. 3d 857, 75 Ill.Dec. 882, 458 N.E.2d 50.; *Board of Educ. of Minooka Community High School Dist. No. 111, Grundy, Kendall and Will Counties v. Carter*, 458 N.E.2d 50, 119 Ill.App.3d 857, 75 Ill.Dec. 882 (Ill. App. 1983)

OTHER OPERATIVE LEGAL AUTHORITY

25. Section 8 of article V of the Constitution does not grant a Governor the authority to promulgate new legal requirements via executive orders. *Buettell v. Walker*, 319 N.E.2d 502, 59 Ill.2d 146 (Ill. 1974)

26. An executive order can be utilized to execute an existing law but it is not a vehicle for establishing a new one. *Id.*

27. According to the Honorable Former Attorney General Lisa Madigan, a Governor does not have the power to legislate by executive order, and therefore, unless authorized by law an executive order relating to matters other than executive reorganization can be no more than a policy directive to agencies under the Governor's control. (See 2013 Ill. Att'y Gen. Op. 002)

28. According to the Honorable Former Attorney General Jim Ryan, emergency powers granted to a Governor under Section 7 of IEMAA cannot be extended beyond 30-days without legislative approval. (See 2001 Ill. Att'y Gen. Op. I-028)

29. Attorney General Ryan went on to advise the act was clear in that it authorized emergency powers for 30-days and construction of the statute any other way would render the limitation clause meaningless. *Id.*

30. Ryan found further support for this construction is supported by references to section 9 of the IEMAA, which pertains to the financing of disaster response measures. Section 9 provides for the Governor's use of particular appropriated funds for emergency purposes, and, if necessary and the General Assembly is not in session, the transfer of funds from other accounts or the borrowing of additional funds, but only "until such time as a quorum of the General Assembly can convene in regular or extraordinary session". The purpose of this provision, like section 7 of the Act, is to empower the Governor to deal immediately with emerging emergency situations. *Id.*

31. Ryan finished by stating, even though many disaster situations could require remediation for a period long in excess of 30-days, normal governmental processes, including legislative action, can be set in motion to meet such needs within 30-days of the occurrence. *Id.*

32. In the case of emergencies it is indispensable to the preservation of public health that some administrative body should be clothed with authority to make adequate rules which have the force of law, and to put these rules and regulations into effect promptly. *Barmore v. Robertson*, 302 Ill. 422, 134 N.E. 815, 819 (Ill. 1922)

33. While the courts will not pass upon the wisdom of the means adopted to restrict and suppress the spread of contagious and infectious diseases, they will interfere if the regulations are arbitrary and unreasonable. *Id.*

34. Health authorities cannot promulgate and enforce rules which merely have a tendency to prevent the spread of contagious and infectious diseases. *Id.* [1]

35. The health authorities cannot interfere with the liberties of a citizen until the emergency actually exists. *Id.*

36. IDPH has general supervision of the interests of the health and lives of the people of the State. (See 20 ILCS 2305/2(a))

37. IDPH has **supreme authority** in matters of quarantine and isolation. (See 20 ILCS 2305/2(a))

38. IDPH defines quarantine as "the separation and restriction of movement or activities of persons who are not ill...." (See key terms on page 66 of IDPH Pandemic Plan attached to the Complaint as Exhibit 5.)

39. Subject to the provisions of subsection (c), the Department may order a person or group of persons to be quarantined or isolated or may order a place to be closed and made off limits

[1] This prohibition sounds awful similar to "flattening the curve". This is yet another example in this cause where Illinois Supreme Court precedent is being ignored by Pritzker in that he is enforcing by executive fiat health regulations which have been deemed beyond the authority of government for almost a century.

to the public to prevent the probable spread of a dangerously contagious or infectious disease. (See 20 ILCS 2305/2(b))

40. Except as provided in this Section, no person or a group of persons may be ordered to be quarantined or isolated and no place may be ordered to be closed and made off limits to the public except with the consent of the person or owner of the place or upon the prior order of a court of competent jurisdiction. (See 20 ILCS 2305/2(c))

41. If the legislative intent of 20 ILCS 2305 *et seq.* is not clear enough to support the legislature intended to give supreme authority of quarantined, isolation and business closures to the IDPH, further legislative action in the county code provides additional support. (See 55 ILCS 5/5-25001 *et seq.*)

42. The board of health of each county or multiple-county health department shall

    a) Within its jurisdiction, and professional and technical competence, enforce and observe all State laws pertaining to the preservation of health….. See 55 ILCS 5/5-25013 (A)(6).

    b) Within its jurisdiction, and professional and technical competence, investigate the existence of any contagious or infectious disease and adopt measures, not inconsistent with the regulations of the State Department of Public Health… See 55 ILCS 5/5-25013 (A)(7).

43. A board of health must necessarily consist of more than one person, and it generally consists of several persons. *Barmore,* 134 N.E. at 820.

44. Many authorities contend that the administration of public health should be vested in an individual. *Id.*

45. This contention is based on the ground that this form of administration of the health laws is productive of efficiency and economy. *Id.*

46. The same argument might be made in favor of an absolute monarchy, but the experience of the world has been that other forms of government, perhaps more cumbersome and less efficient, insure to the people a more reasonable and less arbitrary administration of the laws. *Id.*

47. Whatever may be best, the Legislature of Illinois has said that the public health of cities shall be regulated and guarded by a board of health. *Id.*

48. The powers given to boards of health are extraordinary, and the legislature was evidently unwilling to leave to one person the determination of such important and drastic measures as are given to such boards. *Id.* (Emphasis Added)

AS TO COUNT I THE COURT SHOULD DELCARE THERE HAS BEEN ONLY ONE DISASTER AND AS SUCH PROCLAMATION #2 AND PROCLAMATION #3 FAILED TO MEET THE DEFINITION OF A DISASTER AND AS SUCH ARE INVALID

49. In the TRO hearing on April 27, 2020, counsel for Pritzker ("Pritzker's Counsel") stated to this Court that a declaration of disaster "triggers" the emergency provisions of section 7 of the IEMAA. (Transcript from TRO Hearing, Pg. 41, Lines 17-24)

50. Pritzker's Counsel stated: "so the triggering event is the proclamation and then the 30-days." (Transcript from TRO Hearing, Pg. 42, Lines 2-3)

51. Pritzker's Counsel stated: "If there's another proclamation, then there's another trigger, and, if there's another proclamation, then there's another trigger." (Transcript from TRO Hearing, Pg. 42, Lines 3-5)

52. Pritzker's Counsel further stated: What's the guardrail? What's the guardrail because this can't go on forever? Well, the guardrail is that the Governor is required under the act to declare a disaster. (Transcript from TRO Hearing, Pg. 42, Lines 5-8)

53. The Court asked "What's to stop him from keeping on declaring a disaster for the next five years? (Transcript from TRO Hearing, Pg. 42, Lines 9-10)

54. Pritzker's Counsel stated: Mr. Bailey could bring a case and say his declaration of disaster was not taken in good faith, and that's the standard. (Transcript from TRO Hearing, Pg. 42, Lines 12-14)

55. Notwithstanding Pritzker's Counsel's suggested standard of bad faith, Bailey would never outright accuse Pritzker of arbitrarily reissuing disaster proclamations every 30-days in bad faith merely as a ruse to attempt to maintain an executive stronghold on the state, but reasonable minds might be inclined to consider such a proposition.

56. The language of the IEMAA is clear that a disaster requires an 'occurrence or threat' which meets the definition of Section 4 of the IEMAA.

57. As for Proclamation #1, the occurrence or threat was COVID-19.

58. While efforts were certainly taken at the onset to try and avert a public health emergency, by the time Proclamation #2 and Proclamation #3 were issued it was clear nothing was being averted anymore, and efforts were being taken to manage COVID-19.

59. There is absolutely one occurrence, and one occurrence only, evidencing why Proclamation #2 and Proclamation #3 were even issued, and that was due to arbitrary and unnecessary termination dates placed in the proclamations merely to reset the trigger of the emergency powers.

60. Pritzker's Counsel at the April 27, 2020 hearing all but admitted to this Honorable Court that serial proclamations were being issued merely to "trigger" the emergency powers.

61. Triggering the extension of the emergency powers is not a threat or occurrence as defined in Section 4 of the IEMAA.

62. Case law is clear this Court should not interpret the IEMAA in such a way as to cause absurd results and this Court should always look for the true intent of the legislature.

63. In doing so, the Court must conclude the legislature never intended for the executive branch to issue serial disaster proclamations for the exact same disaster merely to trigger emergency powers.

64. Such an interpretation of the statute would render the express limitation on the emergency powers meaningless.

65. With the facts present, the Court could certainly entertain the proffered standard that Proclamation #2 and Proclamation #3 were not issued in good faith, but it would suffice for the Court to merely find the legislature never intended the executive branch be allowed to place an arbitrary end date in a disaster proclamation merely to "trigger" a reset of the emergency powers with the issuance of a serial disaster proclamation regarding the exact same occurrence or threat which gave rise to the initial disaster proclamation.

66. The Court should find Proclamation #2 and Proclamation #3 were issued solely for the purpose to "trigger" a reset of the emergency powers of section 7 of the IEMAA.

67. As such, Proclamation #2 and Proclamation #3 should be deemed invalid for failure to meet the definition of a disaster of under Section 4 of the IEMAA.

68. Until such time as our legislature changes the definition of disaster to include a continuing proclamation may issue when necessary to create a fiction to arbitrarily extend the

emergency powers to the executive branch, this Court should decline to find such an injustice was intended by the legislature.

69. If the Court is not inclined to strike down the proclamation in total, the Court ought to invalidate the relevant provision of Proclamation #2 and Proclamation #3 which "trigger" the emergency powers.

70. Should the Court choose to invalidate just the relevant provision of Proclamation #2 which triggered a reset of emergency powers, it can be found in Section 1 of Proclamation #2.

71. Should the Court choose to invalidate just the relevant provision of Proclamation #3 which triggered a reset of emergency powers, it can be found in Section 1 of Proclamation #3.

AS TO COUNT II THE COURT SHOULD DELCARE THE 30-DAY EMERGENCY POWERS LAPSED ON APRIL 08, 2020

72. Upon the issuance of a proclamation of disaster, Pritzker shall have and may exercise for a period not to exceed 30-days certain enumerated emergency powers.

73. Pritzker has by devise been exercising emergency powers under Section 7 of the IEMAA since March 09, 2020.

74. Counsel for Pritzker stated to this Court that a declaration of disaster "triggers" the emergency provisions of section 7 of the IEMAA. (Transcript from TRO Hearing, Pg. 41, Lines 17-24)

75. Pritzker's Counsel further stated: "If there's another proclamation, then there's another trigger, and, if there's another proclamation, then there's another trigger." (Transcript from TRO Hearing, Pg. 42, Lines 3-5)

76. Pritzker has issued three proclamations of disaster.

77. The first on March 09, 2020; second on April 01, 2020; lastly April 30, 2020.

78. COVID-19 was a public health emergency at all times relevant.

79. Pritzker placed an arbitrary 30-day expiration date in each of the three disaster proclamations.

80. The IEMAA has no such requirement regarding any termination date in a proclamation of disaster.

81. Each time Pritzker issues a new proclamation in 30-day increments, he continues to wield the emergency powers under Section 7 of the IEMAA for another 30-days.

82. In each and every disaster proclamation, Pritzker refers to the exact same COVID-19 virus as the threat or occurrence present substantiating his proclamation.

83. The documents and admissions of Pritzker's Counsel evidence the serial proclamations of the same COVID-19 disaster are for no other purpose than to trigger emergency power for as long as Pritzker deems prudent.

84. The courts presume that the General Assembly, in passing legislation, did not intend absurdity or injustice.

85. The courts also will avoid a construction of a statute which would render any portion of said statute meaningless or void.

86. It's absurd to believe the legislature intended to allow the executive office to issue numerous consecutive proclamations of disaster for the exact same occurrence or threat, which in this instance is COVID-19, and to allow the executive office to wield the extraordinary emergency powers into perpetuity.

87. Such an interpretation would also render the 30-day limit on emergency powers meaningless.

88. The issue of the 30-day limitation in the IEMAA was presented to former attorney general Jim Ryan in 2001.

89. According to the Honorable Former Attorney General Jim Ryan, emergency powers granted to a Governor under Section 7 of IEMAA cannot be extended beyond 30-days without legislative approval.

90. Attorney General Ryan went on to advise the act was clear in that it authorized emergency powers for 30-days and construction of the statute any other way would render the limitation clause meaningless.

91. Ryan found further support by finding:

a) This construction is supported by references to section 9 of the IEMAA, which pertains to the financing of disaster response measures.

b) Section 9 provides for the Governor's use of particular appropriated funds for emergency purposes, and, if necessary and the General Assembly is not in session, the transfer of funds from other accounts or the borrowing of additional funds, but only "until such time as a quorum of the General Assembly can convene in regular or extraordinary session".

c) The purpose of this provision, like section 7 of the Act, is to empower the Governor to deal immediately with emerging emergency situations.

d) Even though many disaster situations could require remediation for a period long in excess of 30-days, normal governmental processes, including legislative action, can be set in motion to meet such needs within 30-days of the occurrence.

92. Former Attorney General Ryan's opinion seems consistent with the intent of the legislature and Bailey asks this Court to find that same.

AS TO COUNT III THE COURT SHOULD DELCARE PRITZKER HAS NO CONSTITUTIONAL POWER OR STATUTORY POWER TO EVER ORDER CITIZENS TO STAY AT HOME OR TO FORCIBLY CLOSE BUSINESSES

93. If those relevant parts (stay at home and non-essential business closure) of EO 32 are to be valid, Pritzker must find the authority to execute the same either in the Illinois Constitution or the IEMAA.

94. As alleged authority to issue EO 32, Pritzker relies on two sources:

a) Powers vested in him as the Governor of the State of Illinois.

b) Sections 7(1), 7(2), 7(3), 7(8), 7(9) and 7(12) of the IEMAA.

(See the "THEREFORE" clause on page 2 of EO 32)

95. If the authority does not lie in at least one of those two sources, the relevant provisions of EO 32 are void.

A. Pritzker has No Constitutional Grant of Authority

96. In EO 32, Pritzker states the following:

"In regard to Pritzker's powers vested in him by the Illinois Constitution, he states: "whereas, the Illinois Constitution, in Article V, Section 8, provides that the governor shall have the supreme executive power, and shall be responsible for the faithful execution of the laws, and states in the Preamble, that a central purpose of the Illinois Constitution is to provide for the health, and welfare of the people" (See 2nd to last whereas clause of EO 32)

97. Moreover, Pritzker's Counsel goes through great lengths at the TRO hearing on April 27, 2020 to convince the Court Pritzker wields constitutional power to issue the relevant provisions of the executive orders such as those being disputed herein. (Transcript from TRO Hearing, Pg. 57, Lines 7-8) (Transcript from TRO Hearing, Pg. 58, Lines 4-5) (Transcript from TRO Hearing, Pg. 63, Lines 3-4)

98. It needs to be crystal clear, on April 27, 2020, it was the assertion of Attorney General Kwame Raoul's Assistant Chief Deputy that Pritzker lawfully wields Illinois

Constitutional Authority to enter executive orders which restrict citizens movement and activities, and also to forcibly close businesses deemed non-essential in every corner of this state.

99. The Attorney General is the state's chief legal officer and is responsible for protecting the public interest of the state and its people.

100. Protecting the rights of the good people of this state is an obligation of the Office of Attorney General.

101. One can only presume the Attorney General's Kwame Raoul's Office must have overlooked the penned opinion of Former Attorney General Ms. Lisa Madigan from 2013.

102. And one must further presume the Attorney General's Office was not familiar with Illinois Supreme Court authority which expressly forbids the use of executive orders for reasons argued proper to this Honorable Court on April 27, 2020.

103. Section 8 of article V of the Constitution does not grant a Governor the authority to promulgate new legal requirements via executive orders. *Buettell v. Walker*, 319 N.E.2d 502, 59 Ill.2d 146 (Ill. 1974)

104. An executive order can be utilized to execute an existing law but it is not a vehicle for establishing a new one. *Id*.

105. Ms. Madigan's interpretation of the authority of a Governor to legislate via executive order draws a stark contrast to those taken by the current office of Attorney General in this Court.

106. It bears mentioning former Attorney General Madigan's opinion was grounded in the Illinois Supreme Court authority cited directly above.

107. Former Attorney General Madigan was crystal clear when she wrote: "**unless authorized by law an executive order relating to matters other than executive reorganization can be no more than a policy directive to agencies under the Governor's control**"

108. It is fair to say EO 32 goes just a tad bit further than a policy directive to agencies.

109. Contrary to the argument of the current Attorney General's Office in this Court on April 27, 2020, Pritzker can find no refuge in the Illinois Constitution to issue those provisions of EO 32 which trample upon the rights of every citizen in this great state.

No Delegated Authority from the IEMAA

110. None of the specifically enumerated provisions of the IEMAA expressly give Pritzker authority to restrict the movement of people and their activities, or to forcibly close businesses.

111. Only one of the six enumerated provisions of the IEMAA cited by Pritzker could even remotely provide a semblance of implied power.

112. Section 7(8) states:

> (8) To control ingress and egress to and from a disaster area, the movement of persons within the area, and the occupancy of premises therein. (See 20 ILCS 3305/7(8))

113. While it would be a strained interpretation to say the least, the Court need only look to other statutory schemes as well as relevant case law to conclude the legislature never intended to delegate such extraordinary power to the executive in the IEMAA.

114. IDPH has **supreme authority** in matters of quarantine and isolation.

115. IDPH defines quarantine as "the separation and restriction of movement or activities of persons who are not ill…."

116. The board of health of each county or multiple-county health department shall enforce all state laws pertaining to the preservation of health.

117. IDPH finds it authority in 20 ILCS 2305 *et seq.* which authority contains significant procedural and substantive safeguard protections for our people and businesses.

118. Our Illinois Supreme Court was clear almost 100 years ago that such power wielded over our people must be done by a board and not one person.

119. Should the Court find it even necessary to compare the IDPHA and the IEMAA, only one conclusion can be drawn, and that is the legislature created a specific statutory scheme for protecting the public health during times like these within the IDPHA.

120. That scheme includes a board of health in every county, with the oversight of our courts if necessary, which has been entrusted by our legislature, with balancing the protection of the public health with the liberty interests of our people.

121. IDPH wields the power to isolate and quarantine our citizens and to close our businesses when necessary to protect the public health.

122. Almost 100 years ago, our Supreme Court made it clear the legislature never intended to delegate such extraordinary power to one person.

123. Let alone to delegate this power to the heavy hand of the executive branch under the IEMAA, which act is devoid of any procedural safeguards afforded to our citizens in the IDPHA.

124. Pritzker has made no qualms about unleashing administrative agencies with "tools" to enforce his arbitrary orders, which "tools" include potentially placing our citizens in handcuffs and jailing them, all without due process of law.

125. These actions by the executive branch show a complete disregard for the legislative and judicial branches of government.

126. In this great state the rule of law reigns supreme, and as such this Court should conclude the legislature never granted the executive branch the power to issue orders to isolate and quarantine our citizens or to close our businesses under some implied interpretation of the IEMAA.

127. Such an interpretation would cause an injustice of immense proportions to our people and this Honorable Court can safely presume the legislature intended no such purpose.

Respectfully submitted,

By: /s/ Thomas Devore
Thomas G. DeVore
IL Bar Reg. No. 6305737
DeVore Law Offices, LLC
Attorneys for Plaintiff
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
tom@silverlakelaw.com

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that, the undersigned hereby certifies, that a true and correct copy of the foregoing was served via the electronic filing system, this 19th Day of May, 2020, to:

Thomas J. Verticchio, Esq.
Assistant Chief Deputy Attorney General
Office of the Illinois Attorney General
100 West Randolph Street, 11th Floor
Chicago, Illinois 60601
(312) 814-5354 (office)
(708) 525-7635 (cell)
tverticchio@atg.state.il.us

Mr. Isaac Jones, Esq.
Assistant Attorney General, Special Litigation
Office of the Illinois Attorney General
100 West Randolph Street, 11th Floor
Chicago, Illinois 60601
ifreilichjones@atg.state.il.us

By: /s/ Thomas Devore
Thomas G. DeVore
IL Bar Reg. No. 6305737
DeVore Law Offices, LLC
Attorneys for Plaintiff
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
tom@silverlakelaw.com