

1. Plaintiff – John Kraft, *pro se*. The Plaintiff is a resident of Illinois and the County of Edgar.

2. Defendants – Edgar County Board and the Edgar County Airport Advisory Board (ECAAB), “public bodies” as that term is defined by 5 ILCS 120/1.02, Adonna Bennett, individually and in her official capacity as ECAAB chairman, Jake Payne, Ben Jenness, Dale Barkley, Mike Heltsley, Dan Bruner, and Glen Hutchinson, each individually and in their official capacity as ECAAB member

3. On April 16, 2013, at 6:00 p.m., the ECAAB held an open public meeting in the second floor courtroom of the Edgar County Courthouse.

A true and correct copy of the April 16, 2013 meeting agenda is attached hereto and incorporated herein as Exhibit A.

4. During the course of this meeting several items were motioned, seconded, and passed by the majority of the board in violation of the OMA in that the meeting agenda did not list these items as items to be acted upon.

COUNT ONE

(Violation of the Open Meetings Act, 5 ILCS 120/1, *et seq.*)

5. Plaintiffs reaffirm paragraphs 1-4 as though fully restated herein.

6. Plaintiffs have been irreparably harmed by Defendants’ failure to list on the April 16, 2013 ECAAB meeting agenda, as an item where action was taken, specifically, “allowing the chairman of the board to vote.”

7. Plaintiffs have no adequate remedy at law.

COUNT TWO

(Violation of the Open Meetings Act, 5 ILCS 120/1, *et seq.*)

8. Plaintiffs reaffirm paragraphs 1-4 as though fully restated herein.

9. Plaintiffs have been irreparably harmed by Defendants' failure to list on the April 16, 2013 ECAAB meeting agenda, as an item where action was taken, specifically, "that we don't have a commercial operation at the airport main hangar and don't proceed with writing anymore on the contract."

10. Plaintiffs have no adequate remedy at law.

WHEREFORE, Plaintiffs pray that the Court:

A. Declare the Defendants to be in violation of the Open Meetings Act, 5 ILCS 120//1, *et seq.*; and,

B. Grant a Relief by Mandamus by requiring that future ECAAB meetings properly list actionable item on agendas; and,

C. Grant an injunction against future violations of the Open Meetings Act; and,

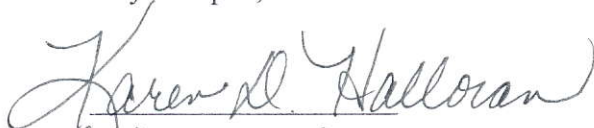
D. Award Plaintiffs attorney's fees and other litigation costs reasonably incurred; and,

E. Order such other and further relief, as outlined in 5 ILCS 120/4.

Dated: April 17, 2013

Respectfully submitted,

Signed and Sworn
Before me this 17th
Day of April, 2013


Karen D. Halloran
Circuit Clerk



John Kraft
7060 Illinois Highway 1
Paris, Illinois 61944
Tel: (217) 808-2527
Plaintiff, pro se

EXHIBIT A

AGENDA
EDGAR COUNTY AIRPORT COMMITTEE
TUESDAY, APR. 16, 2013 AT 6PM

AT THE
EDGAR COUNTY COURTHOUSE
UPSTAIRS COURTROOM
PARIS, IL 61944

1. CALL MEETING TO ORDER
2. MINUTES OF 03-10-13 MEETING
3. ELECT NEW CHAIRMAN AND VICE-CHAIRMAN
4. PUBLIC SESSION
5. FUEL REPORT
6. RENT AND LABOR REPORT
7. APPROPRIATIONS REPORT
8. OLD BUSINESS
 - *DISCUSSION OF BUSINESS CONTRACT
9. NEW BUSINESS
 - *DISCUSS AWOS
10. CLOSED SESSION (IF NECESSARY)
11. ADJOURN