

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT
EDGAR COUNTY, ILLINOIS

JOHN KRAFT, PAMELA KRAFT,
RICHARD WILKEN, JR., STACEY
WILKEN, DIANNE DUZAN, STEVE
TERRELL, MARLENE TERRELL,
ALBERT SCHNEIDER and GORDON
BROWN,

Plaintiffs,

vs.

COUNTY OF EDGAR

and

CHRIS PATRICK, individually and in
his official capacity as Edgar County
Board Chairman

and

BEN JENNESS, MIKE HELTSLEY,
DAN BRUNER, KARL FARNHAM, JR.,
ALAN ZUBER, JEFF VOIGT, each
individually and in official capacities
as Edgar County Board Members

Defendants.

FILED

JUN - 5 2013

Karen D. Halloran
Circuit Clerk, 5th Judicial Circuit Edgar County

Case No: 13- MR -

50

COMPLAINT

NOW COME Plaintiffs, John Kraft, Pamela Kraft, Richard Wilken, Jr.,
Stacey Wilken, Dianne Duzan, Steve Terrell, Marlene Terrell, Albert Schneider
and Gordon Brown (Plaintiffs), by and through their attorney, Jude M. Redwood
and Complaining of Defendants County of Edgar, Chris Patrick, Ben Jenness,
Mike Heltsley, Dan Bruner, Karl Farnham, Jr., Alan Zuber and Jeff Voigt
(Defendants), state as follows:

INTRODUCTION

1. Plaintiffs bring this action for declaratory relief against Defendants as a result of implementation of Defendants' unconstitutional County Board policies, including resolutions/legislation which impair, dilute and debase the voting rights of District 3 residents, including the Plaintiffs and against Defendant Chris Patrick for violation of the Illinois Governmental Ethics Act and State Officials and Employees Ethics Act which impairs, dilutes and debases the voting rights of District 3 residents, including the Plaintiffs.

2. On or about April 12, 2013, the Board held an open public meeting. A true and correct copy of the April 12, 2013 meeting agenda is attached hereto and incorporated herein as Exhibit A.

3. During the aforesaid meeting, the Board approved and passed a resolution/legislation which is an official policy that impairs, dilutes and debases the voting rights of District 3 residents, in that their elected representative, Chris Patrick, is barred from making any decisions and from participating in any vote and from participating in the award or execution of any contract relative to any airport, highway, bridge, or local road construction that is or will be financed in whole or in part with State or Federal Funds. A true and correct copy of this April 12, 2013 resolution attached hereto and incorporated herein as Exhibit B.

4. During the aforesaid meeting, the Board approved and passed a resolution/legislation which is a policy that impairs, dilutes and debases the voting rights of District 3 residents, in that their elected representative, Chris Patrick, is barred from supervising the Edgar County Engineer, as required by

state law (605 ILCS 5/5-205). A true and correct copy of this April 12, 2013 resolution attached hereto and incorporated herein as Exhibit C.

5. Defendant Chris Patrick has totally recused himself from performing his duty to vote on all matters relating to highway, bridge and airport construction and maintenance projects in the County of Edgar due to a financial conflict of interest which impairs, dilutes and debases the voting rights of District 3 residents, in that their elected representative, Chris Patrick refuses to vote on these matters. A true and correct copy of the April 12, 2013 letter signed by Chris Patrick attached hereto and incorporated herein as Exhibit E.

6. On December 5, 2011, Defendant Chris Patrick filed his statement of candidacy as the Republican Party Candidate from District 3 for the Edgar County Board and on aforesaid date, Defendant Chris Patrick filed the required *Statement of Economic Interests* in which he falsely failed to disclosed required financial information, to wit his position as President of Zimmerly Ready Mix Co. A true and correct copy of the December 5, 2011 *Statement of Economic Interest* filed by Chris Patrick is attached hereto and incorporated herein as Exhibit F.

7. Plaintiffs bring this action seeking a Declaratory Judgment that Defendant Chris Patrick acted outside his authority as County Board Member by illegal recusal of himself from voting on matters related to highway, bridge and airport construction and maintenance projects in the County of Edgar.

8. Plaintiffs bring this action seeking a Declaratory Judgment that Defendants Edgar County and the County Board acted outside their authority by

adopting official policies enacting unconstitutional resolutions/legislation.
(Exhibit B and Exhibit C).

9. Plaintiffs bring this action seeking a Declaratory Judgment that Defendant Chris Patrick violated the Illinois Governmental Ethics Act and State Officials and Employees Ethics Act (5 ILCS 420/1-101 et.seq.)("Ethics Act"), and deprived the voters of Edgar County District 3 of knowledge related to a financial conflict of interest affecting the Republican candidate for their District.

THE PARTIES

10. The Plaintiffs are residents of Edgar County, Illinois and specifically Plaintiffs are residents of District 3, which elected Chris Patrick to represent District 3 residents on all matters coming before the Edgar County Board.

11. Defendant, County of Edgar, is a public body, represented by the County Board.

12. Defendant Chris Patrick is the Chairman of the Edgar County Board, a member of the Board required to vote. He is a state actor. Chris Patrick is also the president, secretary and registered agent of a for-profit corporation, Zimmerly Ready Mix, a private ready-mix company located in Edgar County, Illinois which provides and has provided ready-mix, gravel, sand, and other road construction materials to Edgar County and to contractors for the construction and maintenance of Edgar County road and sewer projects and Edgar County airport projects, to the personal financial benefit of Chris Patrick. A true and correct copy of Illinois Secretary of State *Corporation File Detail Report for Zimmerly Ready Mix Co.* attached hereto and incorporated herein as Exhibit D.

13. Defendants Ben Jenness, Mike Heltsley, Dan Bruner, Karl Farnham, Jr., Alan Zuber, Jeff Voigt, are the other six members of the Edgar County Board (the Board) and these members passed unconstitutional resolutions/legislation, requiring Chris Patrick to refrain from voting on airport, road, bridge and maintenance issues and from supervising the County Engineer, which are policies enacted in violation of state and federal law. These Defendants are state actors.

JURISDICTION AND VENUE

14. The Court has jurisdiction over the present action under Illinois Code of Civil Procedure, 735 ILCS 5/2-701 for Declaratory Judgment; Illinois Constitution art. III, §1; 42 U.S.C. §1983 for redress of violation of civil rights under the 14th Amendment's protection of citizens' voting rights; and for statutory attorney's fees under 42 U.S.C. §1988.

15. Venue is proper pursuant to Section 2-101 of the Illinois Code of Civil Procedure. 735 ILCS 5/2-101. All parties reside in Edgar County, Illinois.

FACTUAL BACKGROUND RELATED TO ALL COUNTS

16. On December 5, 2011 Chris Patrick indicated his intent to run as the Republican candidate from District 3, for a position on the Edgar County Board in the November 2012 election, pursuant to state law and using state electoral procedures.

17. On December 5, 2011, pursuant to state law and using state electoral procedures, Chris Patrick filed the *Statement of Economic Interests*, as required by the Ethics Act and in his filing (Exhibit F) he falsified information wherein he failed to disclose his financial interest in Zimmerly Ready Mix Co., which entity

engaged in “doing business with a unit of local government” ie, the County of Edgar and in which Chris Patrick’s ownership interest exceeded \$5,000 fair market value, both within the preceding calendar year.

18. On November 6, 2012, Chris Patrick was elected to the County Board by the voters of District 3, for his first term in office.

19. It was not until four months after the voters of District 3 elected Defendant Chris Patrick to the County Board, that he filed a *Statement of Economic Interests* which disclosed his ownership interest in Zimmerly Ready Mix Co., an entity which has and continues to do business with the County of Edgar and that his ownership interest exceeded \$5,000 fair market value.

20. The voters of District 3 were thereby informed of Defendant Chris Patrick’s financial conflict of interest only after his election to an office which is required to vote on road, bridge, maintenance and airport projects involving Zimmerly Ready Mix Co.

21. Prior to the April 12, 2013 Board meeting, the Illinois Department of Transportation (IDOT) recognized a potential financial conflict of interest regarding the allocation of federal and state funds for highway projects in Edgar County due to Chris Patrick’s direct financial relationship with Zimmerly Ready Mix and his concurrent position as a voting member of the Edgar County Board and IDOT put a “hold” on all state and federal funds until resolution of the issue.

22. At it’s first meeting after the election, the Edgar County Board adopted Robert’s Rules of Order for all of their meetings, which includes the following rule: “The president of the voting body has the exact same rights and

privileges as all other members have, including the right to make motions, to speak in debate, and to vote on all questions. No member can be compelled to refrain from voting even if there is a perceived conflict of interest.” [RONR (11th ed.), p. 407, ll.21-31.]

23. On April 12, 2013, the Board violated the Rule referenced in paragraph 22 when it adopted by vote, a resolution/legislation (*See Exhibit B*) which compelled Chris Patrick to refrain from voting on certain questions before the Board, which is an official policy of Edgar County.

24. The Illinois Highway Code requires the “county superintendent of highways [in counties with population of less than 3,000,000, the county engineer performs all of the duties given to the county superintendent of highways (605 ILCS 5/5-201)] shall, subject to the general supervision of the county board and to the rules and regulations of the Department, perform the functions stated in the following Sections preceding Division 3.” 605 ILCS 5/5-205

25. On April 12, 2013, the Board violated Section 5-201 of the Illinois Highway Code when it adopted by vote, a resolution/legislation (*See Exhibit C*) which removed the supervision of the county engineer from the county board and turned supervision of county engineer over to the road and bridge and motor fuel tax committees, which is an official policy of Edgar County.

26. The Illinois Counties Code provides: “Quorum; approval of ordinances. A majority of the members of any county board shall constitute a quorum for the transaction of business; and all questions which shall arise at

meetings shall be determined by the votes of the majority of the members present, except in such cases as is otherwise provided.” 55 ILCS 5/2-1005 and “Open meetings. The county board shall sit with open doors, and all persons may attend their meetings. The vote on all propositions to appropriate money from the county treasury shall be taken by ‘ayes’ and ‘nays’ and entered on the record of the meeting.” 55 ILCS 5/2-1006

27. No provision in the Counties Code permits an elected official to refuse to vote or to abstain from voting. “If a quorum is present, municipal legislators cannot avoid their voting responsibilities by refusing to vote when present at a meeting.” *Prosser v. Village of Fox Lake*, 91 Ill.2d 389, 394, 438 N.E.2d 134, 135 (1982).

28. A county board member is not allowed to have his physical presence counted toward constitution of a quorum and at the same time be allowed to deny, in effect, his official presence by a failure to vote. “A legal significance must be given to each failure to vote by a municipal legislator who is present at a board meeting in order to prevent frustration or abuse of the legislative process.” *Prosser v. Village of Fox Lake*, 91 Ill.2d 389, 394, 438 N.E.2d 134, 135-36 (1982).

29. Under Illinois law, Chris Patrick’s presence at the county board meeting constitutes a vote. Depending on whether the affirmative vote of a majority or the concurrence of a majority is required, the effect of abstaining or refusing to vote is either counted as an “aye” or a “nay” vote. *Prosser v. Village of Fox Lake*, 91 Ill.2d 389, 393, 438 N.E.2d 134, 135 (1982).

30. Chris Patrick's presence at county board meetings creates a conflict of interest wherein he does, de facto, vote on matters in which he has either a direct or indirect financial interest, including contracts using federal, state and county funds for roads, bridges, road maintenance, airport runways, airport maintenance and other projects where Zimmerly Ready Mix Co. serves as contractor, subcontractor or material supplier to contractors awarded those contracts.

31. Pursuant to the Public Officers Prohibited Activities Act, an elected county board member may not be called upon to vote on any contract in which the elected official may, in any manner, be financially interested, either directly in his own name or indirectly in the name of any other person or corporation. And any contract made and procured in violation of this Act is void. 50 ILCS 105/3

32. The three statutory exceptions to this portion of the Act, apply only where the interested official abstains from that particular vote and has less than either a 7½% share in the ownership of the corporation (105/3(b)(1)(A)) or less than a 1% share in the ownership of the corporation (105/3(b-5)(A)) or the total amount of the contract is less than \$2,000.00 (105/3(b)(2)(B)).

33. There is no provision in the Public Officers Prohibited Activities Act which allows an elected official to be totally barred, by legislation, from making any decisions and from participating in any vote and from participating in the award or execution of any contract relative to any airport, highway, bridge, or local road construction or maintenance that is or will be financed in whole or in part with State or Federal Funds.

**COUNT I - VIOLATION OF ILLINOIS GOVERNMENTAL ETHICS AND
STATE OFFICIAL AND EMPLOYEES ETHICS ACT - CHRIS PATRICK**

34. The Plaintiffs incorporate paragraphs 1, 6, 7, 9, 10, 12 and 14-33 as if fully stated again.

35. Defendant Chris Patrick willfully filed a false or incomplete *Statement of Economic Interests*, intending to mislead the Plaintiffs and other voters of Edgar County District 3 and to deprive them of knowledge important to their voting decisions.

36. The Plaintiffs and other voters of Edgar County District 3 were misled and deprived of the knowledge of Defendant Chris Patrick's financial conflict of interest at the relevant time period, prior to and during the County Board election.

37. The Plaintiffs and other voters of District 3 were misled and deprived of the knowledge that Defendant Chris Patrick's financial conflict of interest would result in unconstitutional County Board resolutions/legislation which are official Edgar County policies that impair, dilute and debase the voting rights of District 3 residents, including the Plaintiffs.

38. Defendant Chris Patrick knowingly and willfully deprived the voters of Edgar County District 3, including the Plaintiffs herein, of their fundamental constitutional right to have their votes protected against dilution or debasement and to have their votes counted.

WHEREFORE, Plaintiffs pray that this Court:

- A. Declare that Chris Patrick violated the Illinois Governmental Ethics Act and State Officials and Employees Ethics Act;
- B. Declare that, by his willful filing of a false or incomplete *Statement of Economic Interests*, Defendant Chris Patrick deprived the Plaintiffs of knowledge related to Defendant's financial conflict of interest affecting their voting rights;
- C. Declare that Defendant Chris Patrick has an incurable conflict of interest regarding his personal financial interests as president, secretary and registered agent of Zimmerly Ready Mix Co. and the financial interests of the County of Edgar and the citizens of District 3 which requires Chris Patrick to resign his position on the Edgar County Board;
- D. Award Plaintiffs attorney's fees and other litigation costs reasonably incurred; and,
- E. Order such other and further relief as the Court deems just and equitable.

COUNT II - ACTION FOR REDRESS OF VIOLATION OF VOTING RIGHTS - ALLEGED AGAINST DEFENDANTS COUNTY OF EDGAR, CHRIS PATRICK, BEN JENNESS, MIKE HELTSLEY, DAN BRUNER, KARL FARNHAM, JR., ALAN ZUBER AND JEFF VOIGT

- 39. The Plaintiffs incorporate paragraphs 1-8, 10-15, 18 and 21-33 as if fully stated again.
- 40. The Defendants created the aforesaid policies (Exhibits B, C and D) for the transaction of governmental business in Edgar County which

unconstitutionally deprive the Plaintiffs herein and other voters of District 3 of their voting rights.

41. The result and impact of the unconstitutional resolutions/legislation enacted by the Board and by Chris Patrick's refusal to vote on a large number of issues involving the voters of District 3 is that the Plaintiffs' claim injury to their voting rights, which are rights of representation personal to each Plaintiff and gives the Plaintiffs standing to sue for declaratory relief. *Kluk v. Lang*, 125 Ill.2d 306, 531 N.E.2d 790 (1988).

42. The right to vote in an election is a fundamental constitutional right *Tully v. Edgar*, 171 Ill.2d 297, 305, 664 N.E.2d 43, 48 (1996), protected by the United States Constitution, 14th Amendment against dilution or debasement. *Hadley v. Junior College District of Metropolitan Kansas City, Missouri*, 397 U.S. 50, 54, 90 S.Ct. 791, 794 (1970).

43. Suffrage - the expression by the people of their will - is fundamental to a viable democratic form of government which is protected by Article III, section 1 of the 1970 Illinois Constitution which reaffirms that all qualified citizens have a constitutionally protected right to vote and to have their votes counted. *Tully v. Edgar*, 171 Ill.2d 297, 305-306, 664 N.E.2d 43, 48 (1996)

44. When the people have chosen their representative in a valid election, legislation that nullifies the people's choice by eliminating the right of the elected official to serve implicates the fundamental right to vote. *Tully v. Edgar*, 171 Ill.2d 297, 308, 664 N.E.2d 43, 49 (1996).

45. As stated by the Supreme Court of Vermont: A public official's overriding and undivided duty of loyalty is to the public he serves; a man cannot serve two masters at the same time and the public interest should not be entrusted to an official who has a pecuniary, personal or private interest which is or may be in conflict with the public interest; public policy demands that an office holder discharge his duties with undivided loyalty. *In re Boardman*, 186 Vt. 176, 184, 979 A.2d 1010, 1015-15 (2009).

46. Defendants have knowingly and willfully deprived the voters of Edgar County District 3, including the Plaintiffs herein, of their fundamental constitutional right to have their votes protected against dilution or debasement and to have their votes counted in violation of Illinois Constitution art. III, §1 and the 14th Amendment to the United States Constitution.

WHEREFORE, Plaintiffs pray that this Court:

A. Declare the County Board resolution/legislation approved on April 12, 2013 and attached hereto as Exhibit B to be unconstitutional and void on its face;

B. Declare the County Board resolution/legislation approved on April 12, 2013 and attached hereto as Exhibit C to be unconstitutional and void on its face;

C. Declare Defendant Chris Patrick's April 12, 2013 recusal letter to be unconstitutional and void on its face;

D. Declare that Defendant Chris Patrick has an incurable conflict of interest regarding his personal financial interests as president, secretary and registered agent of Zimmerly Ready Mix Co. and the financial interests of the

County of Edgar and the citizens of District 3 which requires Chris Patrick to resign his position on the Edgar County Board;

E. Declare as void and unconstitutionally obtained, all votes and all actions taken by the Edgar County Board from which Chris Patrick's vote was excluded, either by Board resolution or his personal recusal;

F. Declare as void any contract made or procured in violation of the Public Officers Prohibited Activities Act;

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

H. Order such other and further relief as the Court deems just and equitable.

Respectfully submitted,

John Kraft, Pamela Kraft, Richard Wilken, Jr.,
Stacey Wilken, Dianne Duzan, Steve Terrell,
Marlene Terrell, Albert Schneider and Gordon
Brown, Plaintiffs.

Dated: June 5, 2013

By: Jude M. Redwood
Jude M. Redwood, Attorney for Plaintiffs

Mrs. Jude M. Redwood
Redwood Law Office
P.O. Box 864
St. Joseph, IL 61873
(217) 469-9194
Fax (217) 469-8094
redwoodlaw42@hotmail.com

EDGAR COUNTY BOARD

SPECIAL MEETING

4/12/13

1:00 p.m.

Edgar County Courthouse

Courtroom #2

Paris, IL 61944

AGENDA

1. Call To Order
2. Pledge of Allegiance
3. Roll Call
4. Public Session
5. Board approval of Vice Chairman to execute all IDOT required documents passed by the Board effecting local aeronautic, road and bridge maintenance and construction projects.
6. Board approval of clarifying County Engineer's responsibility to report Road & Bridge Committee and MFT Committee.
7. Adjourn

EDGAR COUNTY BOARD

SPECIAL MEETING

4/12/13

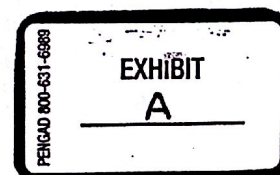
1:00 p.m.

Edgar County Courthouse

Courtroom #2

Paris, IL 61944

AGENDA



1. Call To Order

2. Pledge of Allegiance

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Call

Roll

4. Public Session

5. Board approval of Vice Chairman to execute all IDOT required documents
and bridge maintenance passed by the Board effecting local aeronautic, road
and construction projects.

6. Board approval of clarifying
County Engineer's responsibility to report to

Road & Bridge Committee and MFT Committee.

7. Adjourn

WHEREAS, the Illinois Department of Transportation (IDOT) controls distribution of funds for local projects involving airport, road and bridge maintenance and construction improvements; and

WHEREAS, IDOT has expressed concern over the potential for a conflict of interest involving duly elected County Board Member Chris Patrick, appointed by the County Board as Chairman, who is the sole concrete supplier in Edgar County; and

WHEREAS, IDOT, the Edgar County Board and the Chairman of the County Board seek to protect tax payer funds and to avoid the potential for a conflict of interest; and

WHEREAS, the Edgar County Board, IDOT and the Chairman of the County Board agree that the Chairman will not make any decisions nor participate in any vote or participate in the award or execution relative to any airport, highway or local road construction or maintenance contract that is or will be financed in whole or in part with State or Federal Funds; therefore

BE IT HEREBY RESOLVED that the Edgar County Board authorizes its Vice Chairman to execute any and all necessary documents on behalf of the Edgar County Board relative to local road, bridge and airport maintenance and construction contracts during the duration of Mr. Patrick's tenure as Chairman of the Edgar County Board.

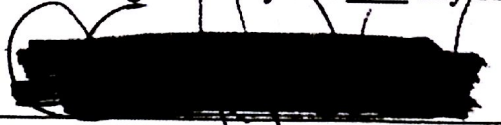
I move for the adoption of the foregoing Resolution.


Board Member

I second the motion for the adoption of the foregoing Resolution.


Board Member

13. Passed and adopted by the County Board of Edgar County this ____ day of April,


Chairman of the Board

WITNESSES:

_____(SEAL)
Edgar County Clerk

EXHIBIT

B

FD-503 (Rev. 8-63) 5010-108

WHEREAS, the Illinois Department of Transportation (IDOT) controls distribution of funds for local projects involving road, bridge and airport maintenance and construction improvements; and

WHEREAS, IDOT has expressed concern over the potential for a conflict of interest involving duly elected County Board Member Chris Patrick, appointed by the County Board as Chairman, who is the sole concrete supplier in Edgar County; and

WHEREAS, IDOT, the Edgar County Board and the Chairman of the County Board seek to protect tax payer funds and to avoid the potential for a conflict of interest; and

WHEREAS, the Edgar County Engineer is responsible for the oversight of local road and bridge maintenance and construction improvements; and

WHEREAS, the Edgar County Engineer is responsible for the oversight of federal and state funds received in Edgar County for local road and bridge maintenance and construction improvements.

BE IT HEREBY RESOLVED that the Edgar County Engineer shall report, seek guidance from and make recommendations to the Road and Bridge Committee and the Motor Fuel Tax Committee, both of which are standing committees of the Edgar County Board.

I move for the adoption of the foregoing Resolution.


Board Member

I second the motion for the adoption of the foregoing Resolution.

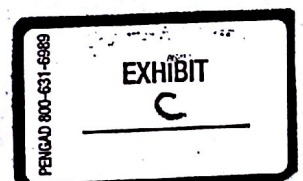

Board Member

Passed and adopted by the County Board of Edgar County this ____ day of April, 2013.

Chairman of the Board

TEST:

_____(SEAL)
Edgar County Clerk



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ILLINOIS.COM

JESSE WHITE
SECRETARY OF STATE



CORPORATION FILE DETAIL REPORT

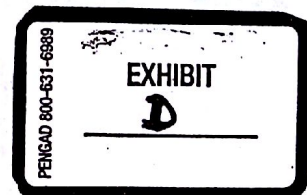
Entity Name	ZIMMERLY READY MIX CO.	File Number	35803793
Status	ACTIVE		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	01/25/1956	State	ILLINOIS
Agent Name	CHRIS J PATRICK	Agent Change Date	02/09/1993
Agent Street Address	1604 S MARSHALL PO BOX 395	President Name & Address	CHRIS J PATRICK 5566 N 1175TH STREET PARIS 61944
Agent City	PARIS	Secretary Name & Address	CHRIS J PATRICK 5566 N 1175TH STREET PARIS 61944
Agent Zip	61944	Duration Date	PERPETUAL
Annual Report Filing Date	12/10/2012	For Year	2013

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EDGAR COUNTY BOARD

115 W. Court St. Rm. J

Paris, IL 61944-1785

Ph. (217) 466-7433 - Fax: (217) 466-7430

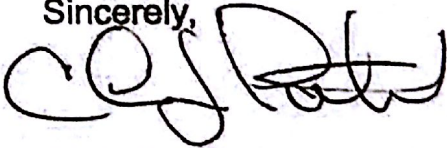
eccr@edgarcountyillinois.com

April 12, 2013

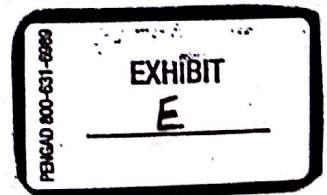
To Whom It May Concern;

In my capacity as the Edgar County Board Chairman, I recuse myself from making any decisions, participating in any vote or participating in the award or execution relative to any airport, highway or local road construction or maintenance contract that is or will be financed in whole or in part with state or federal funds.

Sincerely,



Chris Patrick



Chris Patrick, Chairman

Ben H. Jenness, Vice-Chairman

Alan Zuber

D. Jeffry Voigt

Dan Bruner

Karl E. Farnham, Jr.

Mike Heltsley

Statement of Economic Interests to be Filed with the County Clerk
Your Name Was Submitted For Filing by an Entity That You Represent
(Type or Print)

Name: CHRIS PATRICK

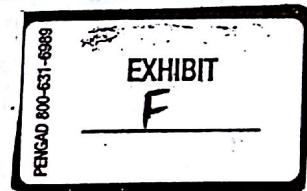
**COPY
FILED**

Each Office or Position of Employment for which this Statement is Filed:

COUNTY BOARD DIST 3

DEC 05 2011

Edgar County Clerk
EDGAR COUNTY CLERK



Full Post Office Address:

5566 N 1175 ST

PARIS, ILLINOIS 61944

GENERAL DIRECTIONS

The interest (if constructively controlled by the person making the statement) of a spouse or any other party shall be considered to be the same as the interest of the person making the statement. Campaign receipts shall not be included in this statement. If more space is needed, please attach supplemental listing.

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000 fair market value, or from which dividends in excess of \$1,200 were received during the preceding calendar year: (In the case of real estate, location thereof shall be listed by the street address, or if none, then by legal description.) No time or demand deposit in a financial institution, nor any debt instrument shall be listed.

Business Entity	Instrument of Ownership	Position of Management
<hr/>	<hr/>	<hr/>
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2. List the name, address and type of practice of any professional organization in which the person making the statement was an officer, director, associate, partner or proprietor, or served in any advisory capacity, from which income in excess of \$1,200 was derived during the preceding calendar year:

Name	Address	Type of Practice
<hr/>	<hr/>	<hr/>
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3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required to file) to each entity from which income exceeding \$5,000 was received for professional services rendered during the preceding calendar year by the person making the statement:

<hr/>
<hr/>

4. List the identity (including address or legal description of real estate) of any capital asset from which a capital gain of \$5,000 or more was realized during the preceding calendar year:

5. List the name of any entity and the nature of the governmental action requested by any entity that has applied to a unit of local government in relation to which the person must file for any license, franchise or permit for annexation, zoning or rezoning of real estate during the preceding calendar year, if the ownership interest of the person filing is in excess of \$5,000 fair market value at the time of filing, or if income or dividends in excess of \$1,200 were received by the person filing from the entity during the preceding calendar year:

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file, from which income in excess of \$1,200 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity: (No time or demand deposit in a financial institution nor any debt instrument need be listed.)

7. List the name of any unit of government that employed the person making the statement during the preceding calendar year, other than the unit or units of government in relation to which the person is required to file:

8. List the name of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500, was received during the preceding calendar year:

VERIFICATION

I declare that this Statement of Economic Interests (including any accompanying schedules and statements) has been examined by me and to the best of my knowledge and belief is a true, correct and complete statement of my economic interests as required by the Illinois Governmental Ethics Act. I understand that the penalty for willfully filing a false or incomplete statement shall be a fine not to exceed \$1,000, or imprisonment in a penal institution other than the penitentiary not to exceed one year, or both fine and imprisonment.

Signature of Person Making Statement

12-5-11
Date

COPY