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**CEASE AND DESIST**

SENT VIA FAX TO: 309-679-6174

June 12, 2020

Ms. Monica Hendrickson  
Peoria County Health Department  
2116 N. Sheridan Rd.  
Peoria, Illinois 61604

Dear Ms. Hendrickson,

Please be advised our firm represents numerous businesses within the City of Peoria. With each day that passes, I continue to read and memorialize various threats made by your department regarding actions which may allegedly be taken against the hard-working business owners operating within the City of Peoria. At this time on behalf of my clients, I am hereby putting the Peoria County Health Department, the City of Peoria, Peoria County, Ms. Carey A. Panier, as well as you personally on notice to cease and desist with any further efforts to violate my client's civil rights.

It is abundantly clear the Peoria County Health Department wields the supreme authority over business closures. However, this extraordinary authority does not include blind allegiance to an executive order which provides no specific articulable facts towards any business you

*560 Suppiger Way, P.O. Box 188  
Highland, Illinois 62249  
Telephone 618-654-8341  
Facsimile 618-654-8391*

*118 North Second Street  
Greenville, Illinois 62246  
Telephone 618-664-9439  
Facsimile 618-664-9486*

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continue to threaten. Whether you agree in principal with the executive order or not is of no consequence, as our legislature did not delegate your office authority over such matters merely so you can acquiesce to the arbitrary and caprice decisions of the executive branch.

To the extent you feel compelled to believe the Governor's executive order somehow supersedes the legislatures delegation of supreme authority to your health department, I would suggest you consider taking the time to discuss such erroneous determinations with the county insurance provider before taking any action against my client solely based upon blind allegiance to this executive fiat.

Please be advised, **you are hereby put on notice**, that if your department takes action against any of our clients not specifically authorized by law, the same will be met with swift and decisive legal action against the health department, the city, the county, as well as any individual public officials specifically participating. Such action includes any and all remedies available under state and federal law.

I close by recognizing that your department, like all citizens and businesses, find themselves in unique and challenging circumstances. However, unlike the State of Illinois, its agencies, and public servants such as yourself, the ability of citizens and small businesses to feed their families and survive requires that they go to work and/or keep their doors open. Small businesses do not have the same advantage as state actors wherein their paychecks continue to flow despite their efforts to destroy the very citizens and businesses which they purportedly

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represent. We would assume you and your department are fully aware of the devastation being wrought upon the people of this State, including but not limited to, financial disaster and health issues, both mental and physical. It seems your department should be focusing its attention on how to assist the good people with those disasters rather than trying to further devastate small business which are the backbone of this State's economy.

To the extent you disagree with that proposition, please remember you have all been put on notice.

Respectfully,

/s/ Thomas G. DeVore  
Thomas G. DeVore  
Silverlake Group, Ltd.  
Greenville, IL 62246  
[tom@silverlakelaw.com](mailto:tom@silverlakelaw.com)

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