

**IN THE CIRCUIT COURT
FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS**

IN RE: COVID-19 LITIGATION

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Case No. 2020-MR-589

**VERIFIED PETITION FOR ADJUDICATION OF
INDIRECT CIVIL CONTEMPT**

COMES NOW, Plaintiff, Darren Bailey, by and through his attorney, Thomas DeVore, of DeVore Law Offices, LLC, and as for his Petition for Adjudication of Indirect Civil Contempt against the Defendant, Jay Robert Pritzker (“Pritzker”), states as follows:

1. On or about July 02, 2020, this Court declared Pritzker no longer had any emergency powers under Section 7 of the IEMAA after April 08, 2020.
2. On or about July 02, 2020, this Court also declared any executive orders in effect after April 08, 2020 related to COVID-19 and finding their authority under the emergency powers of Section 7 of the IEMAA void.
3. In complete disregard of this Court’s July 02, 2020 order, on October 02, 2020, Pritzker issued executive order 56 regarding COVID-19 and cites as authority his enumerated powers under Section 7 of the IEMAA.
4. In complete disregard of this Court’s July 02, 2020 order, on October 16, 2020, Pritzker issued executive order 59 regarding COVID-19 and cites as authority his enumerated powers under Section 7 of the IEMAA.
5. In complete disregard of this Court’s July 02, 2020 order, on October 21, 2020, Pritzker issued executive order 60 regarding COVID-19 and cites as authority his enumerated powers under Section 7 of the IEMAA.
6. In complete disregard of this Court’s July 02, 2020 order, on October 21, 2020, Pritzker issued executive order 61 regarding COVID-19 and cites as authority his enumerated powers under Section 7 of the IEMAA.

7. If all of the actions of Pritzker complained of herein could not be more derogatory to this Court's authority and dignity, he specifically went on to issue executive orders 60 and 61 even after this Honorable Court, just two days prior, refused to vacate its July 02, 2020 grant of summary judgment which specifically declared on the merits he no longer had authority under Section 7 of the IEMAA to issue executive orders regarding COVID-19.
8. These willful actions of the Defendant, Jay Robert Pritzker, constitute *prima facie* evidence of contemptuous acts which are calculated to embarrass, hinder, or obstruct this Honorable Court in its administration of justice, and are expressly calculated to derogate from its authority and dignity.
9. Everyday citizens throughout this state who find themselves in front of our honorable courts are never allowed to take actions which will directly embarrass, hinder or obstruct the court's authority and dignity; and our elected officials, even a governor, must unequivocally be held to the same standards of conduct as we hold our citizenry if we ever hope to maintain the sanctity of our system of justice in the eyes and hearts of the people.

WHEREFORE, Plaintiff, Darren Bailey, respectfully prays for this Court to enter an order as follows:

- A. That, Jay Robert Pritzker, be adjudged in indirect civil contempt of this Court and be required to show cause, if any he can, why he should not be held in contempt of this Court and punished in a manner this Court finds proper for his willful and contumacious disregard with this Court's order;
- B. That Jay Robert Pritzker be ordered to purge himself by rescinding the above-mentioned executive orders instanter;
- C. In the alternative, the Court craft any other just sanction which compels Jay Robert Pritzker to purge his contempt.
- D. That Jay Robert Pritzker be held liable for the Darren Bailey's attorney fees he has incurred in enforcing the willful disregard of this Court's order;
- E. That this Court enter any further orders which the Court deems just and equitable.

DARREN BAILEY, Plaintiff

By: /s/ Thomas DeVore

Thomas DeVore, His Attorney

VERIFICATION BY CERTIFICATION

The undersigned hereby certifies under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, that the statements set forth in this document are 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.

/s/ Darren Bailey
Darren Bailey

Thomas G. DeVore
IL Bar Reg. No. 6305737
DeVore Law Offices, LLC
Attorney for Plaintiff
118 N. 2nd St.
Greenville, IL 62246
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CERTIFICATE OF SERVICE

STATE OF ILLINOIS)
) SS.
COUNTY OF BOND)

The undersigned hereby certifies, pursuant to the provisions of 735 ILCS 5/1-109, and the penalties therein provided, that a copy of the foregoing instrument was served via electronic means, on October 22, 2020:

Mr. Thomas Verticchio
Attorney General's Office
tverticchio@atg.state.il.us

Renee L. Monfort
ILLINOIS HEALTH AND HOSPITAL ASSOCIATION
urbecf@heyloyster.com

and that the original was filed with the Clerk of the Court in which said cause is pending.

/s/Thomas DeVore
Thomas DeVore