



# Martin Law Office

Todd L. Martin  
*Attorney at Law*

October 16, 2019

Mr. Jim Olson  
LaSalle County Board Chairman  
County of LaSalle  
707 E. Etna Road  
Ottawa, IL 61350

Dear Mr. Olson:

Re: Our Files 717-18 and 720-18  
Tori Artman & Pamela Wright

I represent Tori Artman and Pamela Wright, former employees of the County of LaSalle. It is in that capacity that I am writing to you. The purpose of this communication is for settlement purposes only and the content of this correspondence is intended to remain confidential. **If you choose to release any or all of the content of this correspondence prior to any type of an agreement, all discussion of settlement will be terminated and suit will immediately be filed on behalf of both Ms. Artman and Ms. Wright.**

As you know, both Ms. Artman and Ms. Wright were first barred from entering the LaSalle County building by the LaSalle County Board and then terminated from their positions in the Auditor's Office by the Salary and Labor Committee of the LaSalle County Board as the result of criminal charges that were filed by Karen Donnelly and the LaSalle County State's Attorney's Office. As you also know, Tori Artman was found not guilty by a jury of her peers and the charges against Pamela Wright were dismissed.

Our position in this matter is clear, that is that the LaSalle County Board violated Ms. Artman's and Ms. Wright's rights in several ways and most importantly defamed them. **This correspondence is not intended to lay out our complaint against the County, it is intended to avoid what I see as the most expensive litigation that LaSalle County has ever seen or at least since I began practicing law.**

Mr. Jim Olson  
LaSalle County Board Chairman  
Page 2  
October 16, 2019

The imputation of a criminal offense is defamatory *per se* in Illinois as are statements that impute an inability to perform or a want of integrity in the discharge of ones duties of employment. Both of which we have here.

In interviews given to the Ottawa Times Newspaper, two board members openly discussed the employment of specific employees (see enclosed article). One board member is even on record saying that there is enough evidence from court findings to take disciplinary action. This is an absolutely false statement. In addition to this, prior to a full board meeting and outside of executive session, another board member passed out a sheet (see enclosed) detailing salary increases these two employees received without any context of what the increases were for. The import of the handout was to assassinate the charter of these employees.

These activities fly in the face of the language of the Labor Contract between the County Board and the Elected Officials, "[t]he employer shall do whatever is necessary and reasonable, when imposing disciplinary action, in order to avoid unnecessary embarrassment to the employee."

These are just two examples of a multitude of events and accusations that are untrue, uninvestigated and unfounded.

It is clear that the LaSalle County Board acted without regard to the actual facts of the case or to the best interests of the employees. There was absolutely no independent investigation conducted by the County Board to determine the true facts of this case. The board appeared to go out of its way to make decisions without any independent investigation or advice from legal counsel thereby acting with malice towards these employees.

There are even quotes from board members acknowledging that the actions being taken by the majority are violating the employee's rights.

Be advised that trial evidence will show that these accusations against Ms. Artman, 45 years of age and Ms. Wright, 55 years of age have prevented them and continue to prevent them both from obtaining positions in their fields of accounting as well as causing them to suffer from unnecessary humiliation and embarrassment from the repeated number of times this matter was discussed by the LaSalle County Board.

After discussion with my clients I have been authorized to express their willingness to settle all claims they may have for \$1,500,000 to each employee. As a result of any agreement, both employees would be reinstated to their positions and Ms. Artman would resign and Ms. Wright would retire with full eligibility to whatever benefits are available to retirees.

Mr. Jim Olson  
LaSalle County Board Chairman  
Page 3  
October 16, 2019

This proposal will remain open for 30 days. **If there is no agreement, we will initiate suit.** My clients intend to make complaints to all agencies available to them and LaSalle County will expend an inordinate amount of money to defend these claims and the County will still ultimately be held responsible for damages to both Tori Artman and Pamela Wright.

I shall await your timely reply.

Very truly yours,

A handwritten signature in black ink, appearing to read "Todd L. Martin", written over a horizontal line.

Todd L. Martin