

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

*Susan W. McGee*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

AARON WHEELER and DAVID PARSONS, )

Plaintiffs, )

v. )

BRIAN ANDERSON, CHAD COIT, LISA )

SLADE, MARCELLA HALL, JOHN )

BAMBENEK, CRAIG ANDERSON, and )

SAMANTHA OLSON, )

Defendants. )

2022LA000162

No. \_\_\_\_\_

**JURY DEMANDED**

VERIFIED COMPLAINT

NOW COME the Plaintiffs, AARON WHEELER and DAVID PARSONS, by and through their attorneys, Meyer Capel, *A Professional Corporation*, by James J. Schmidt and Lauren B. McQueen, and for their Complaint against Defendants, state:

Facts

1. Plaintiffs are residents of Mahomet Township, Champaign County, Illinois.
2. Plaintiffs are elected officials in Mahomet Township. Aaron is the Township Supervisor and David is the Township Clerk.
3. Defendants are, upon information and belief, residents or landowners of Mahomet Township.
4. Defendants desire to either have Plaintiffs removed from their elected positions or to force Plaintiffs to resign.
5. To that end, Defendants have engaged in a concerted effort to defame, harass, and humiliate Plaintiffs, as further described in this Complaint.

*Brian Anderson*

6. Brian Anderson has personally attacked both Plaintiffs at township meetings and online.

7. Anderson created a Facebook group entitled Mahomet Township Citizens and posted multiple, untrue statements and accusations against Plaintiffs and other township officials.
8. Anderson has sent Freedom of Information Act requests of a frequency and manner that are calculated to harass, annoy, and burden Plaintiffs and other township officials.
9. In the eight months from March 2022 through November 2022, for example, Anderson sent at least 49 FOIA requests to the township: March 1, March 5, a second request dated March 5, March 7, March 9, March 10, March 13, March 17, March 18, a second request dated March 18, a third request dated March 18, March 20, March 26, April 1, April 8, April 10, April 11, a request dated March 17 but received April 12, April 14, a second request dated April 14, May 10, May 20, an undated request in May, an undated handwritten request on or around May 26, a typed request dated May 26, June 3, June 12, June 13, June 23, June 28, June 29, July 3, July 6, July 7, July 13, a second request date July 13, July 15, July 24, August 10, August 19, September 12, September 24, September 27, October 17, October 20, October 26, November 8, November 11, and November 22.
10. Many of these requests are improper requests by which Anderson harasses and attempts to intimidate Plaintiffs and other township officials. In his March 20 letter, for example, Anderson includes the following paragraph:

**Please explain how Aaron Wheeler can sign that the information is a "correct report". Under EXPENDITURES, line item PAYROLL (gross salary), Chris Doenitz is listed in the category of \$25,000-\$49,999. Unless the township uses a different definition of "gross", I believe that the financial statement is not a "correct report". How many other people's wages are erroneously and misleadingly reported in the two 2021 financial statements? How many other year's statements have been incorrect? Will the 2022 fiscal financial statements contain incorrect information?**

11. Anderson has also sent FOIA requests to the Mahomet Township Road District .

12. If Anderson's FOIA request is not granted in its entirety without any redactions, he often files a Request for Review by the Illinois Attorney General Public Access Counselor.
13. The Public Access Counselor has not, to Plaintiffs' recollection, upheld a single request for review by Anderson.
14. Anderson has appeared at Mahomet Township meetings and made accusations that Plaintiffs and others have committed fraud.
15. At the October 12, 2022 Mahomet Township meeting, Anderson stated that Plaintiffs should resign and that he would come in and clean up.
16. Anderson has called Aaron on Aaron's employer's business phone line at least twice while Aaron is working to discuss Township business.
17. On or around April 14, 2022, Anderson called Aaron's employer, Country Financial.
18. During that call, Anderson, at that time a client of Country Financial, withdrew his business from Country Financial.
19. The reason Anderson gave for withdrawing his business was that he would not do business with a company that employed someone that engaged in fraud, referring to Aaron.
20. Anderson publicly expressed his displeasure that withdrawing his business from Country Financial "does not affect [Aaron] financially."
21. Aaron has not committed fraud.
22. Anderson's statement that Aaron committed fraud was untrue.
23. Upon information and belief, in or around 2007, Anderson contacted the Champaign County State's Attorney's office and complained that David had doctored a timecard.
24. Anderson later told David on multiple occasions that he hoped that David did not get in trouble for whatever unlawful action Anderson believed that David took.

25. On July 11, 2022, Anderson called David to ask David why David talked badly about Anderson to an acquaintance of Anderson's. Anderson asked whether David, in making the alleged statements, was representing the Township or David's personal business.
26. That night, Anderson and Chad Coit each made multiple Facebook posts about David.
27. Chad Coit also frequently posts untrue statements and accusations against Plaintiffs on Facebook and social media, including accusing them of fraud.
28. Coit has sent Freedom of Information Act requests of a frequency and manner that are calculated to harass, annoy, and burden Plaintiffs and other township officials.
29. In the eight months from March 2022 through November 2022, for example, Coit sent at least 19 FOIA requests to the township: May 2, May 6, May 11, May 15, May 24, May 31, June 3, June 13, June 14, June 21, June 25, June 29, July 6, July 15, July 24, August 4, August 10, August 15, and October 16.
30. Coit has also sent FOIA requests to the Mahomet Township Road District.
31. If Coit's FOIA is not granted in its entirety without any redactions, he often files a Request for Review by the Illinois Attorney General Public Access Counselor.
32. The Public Access Counselor has not, to Plaintiffs' recollection, upheld a single request for review by Coit.
33. Coit has appeared at Mahomet Township meetings and made accusations that Plaintiffs and others have committed fraud.
34. Plaintiffs have not committed fraud.
35. Coit's statements that Plaintiffs have committed fraud were untrue.
36. On or around February 21, 2022, Coit created a Facebook page purporting to represent the Mahomet Township Road District.

37. The Road District was forced to obtain a restraining order to force Coit to stop operating a Facebook page that falsely claimed to be the Mahomet Township Road District.
38. On or around April 14, 2022, the same day that Anderson called Aaron's employer, Coit, too, called Country Financial.
39. Coit, at that time also a client of Country Financial, withdrew his business from Country Financial.
40. Just like Anderson, Coit stated that he would not do business with a company that employed someone that engaged in fraud, referring to Aaron.
41. Coit's statement that Aaron committed fraud was untrue.
42. On or around July 1, 2022, Coit met with David Parsons at the township building to receive and sign paperwork regarding a petition.
43. In Coit's words, he "confronted" David regarding a statement David allegedly made to another individual.
44. As Parsons was making copies, Coit indicated his actions toward Plaintiffs would end when someone leaves their position with the Township.
45. Coit initially would not indicate who the "someone" was. When Parsons asked if it was Doenitz, Coit replied "yes, and his crime family."
46. Soon after that interaction, on July 6, 2022, Coit sent a FOIA request seeking all bills and invoices from Parsons Electric—David's late father's company—to the Mahomet Township Road District from April 1, 2013 through March 31, 2018. A true and correct copy of Coit's July 6, 2022 FOIA Request is attached as Exhibit 1 and incorporated by reference.

47. The clear intent behind this request was to infer that Parsons, his father, or both are part of a "crime family" and that Coit would not stop harassing Parsons unless and until Parsons was no longer in office.

48. On or around July 12, 2022, Coit sent an email to Aaron's personal email address regarding his request for an extension of a culvert at the end of his driveway.

49. *Lisa Slade*

Lisa Slade is, upon information and belief, in a romantic relationship with Brian Anderson.

50. Slade has sent FOIA requests in the same format as the other Defendants, including the same language and typographical error.

51. In the eight months from March 2022 through November 2022, Slade sent at least 14 FOIA requests in 2022: May 15, May 22, June 1, June 8, dated June 16 (but sent June 27), June 29, July 3, July 9, August 11, a second request dated August 11, August 18, September 15, October 9, and October 15.

52. *Marcella Hall*  
Marcella Hall, also known as Marcy Hall, has posted untrue statements and accusations about Plaintiffs on Facebook.

53. In the eight months from March 2022 through November 2022, Hall has sent at least three FOIA requests in the same format as the other Defendants, including the same language and typographical error: September 19, October 17, and November 21.

54. *John Bambenek*  
On or around September 14, 2022, Bambenek filed two lawsuits, one each against Aaron and David, alleging that they unlawfully hold their offices.

55. On September 15, 2022, Bambenek issued a "press release" regarding the lawsuits in which he stated that, in his opinion, Aaron and Dave were "defraud[ing] their neighbors." A true and correct copy of Bambenek's "press release" is attached as Exhibit 2 and incorporated by reference.
56. Plaintiffs have not "defraud[ed] their neighbors."
57. Bambenek's statement that Plaintiffs were "defraud[ing] their neighbors" was false.
58. The next day, on or around September 16, 2022, Bambenek created a TikTok video in front of the Township office with the words displayed "Where's [sic] Aaron Wheeler and David Parsons?"
59. On October 12, 2022, Bambenek attended the Mahomet Township meeting and expressed his intent to "take over and clean up this mess."
60. On November 15, 2022, Bambenek sent an email to Aaron's personal email address stating that Bambenek was "a reporter for Mahomet Leaks." Bambenek asked Aaron if Aaron had any comment on a police report and asked Aaron to let him know by the close of business on November 16 so that Bambenek could include Aaron's "perspective in [Bambenek's] story":

Mr. Wheeler-

I'm a reporter for Mahomet Leaks. Do you have any comment on the attached police report. If you could let me know by close of business tomorrow, I can include your perspective in my story.

Thanks,

J

A true and correct copy of the email dated November 15, 2022 is attached as Exhibit 3 and incorporated by reference.

61. This email was sent the evening before the hearing on Bambenek's Motion to File Quo Warranto Complaint.

62. Moreover, Mahomet Leaks is not a legitimate news organization.
63. Rather, it was created as a tool to further harass, defame, demean, and intimidate Plaintiffs.
64. Indeed, the website itself says that it is "Powered by Bourbon and Bad Decisions":

MAHOMET LEAKS

POWERED BY BOURBON AND BAD DECISIONS

COPYRIGHT © 2022 MAHOMET LEAKS - ALL RIGHTS RESERVED.

65. As of this filing of this Complaint, December 5, 2022, 20 days after Bambenek's request, Bambenek had not published any "story" about the police report for which he sought Aaron's "perspective."
66. On or around December 2, 2022, Bambenek filed another lawsuit against David, in his official capacity as Mahomet Township Clerk, alleging that David failed to call a special meeting Bambenek had demanded and for failing to add Mahomet Leaks to the Mahomet Township media distribution list.
67. On or around December 5, 2022, Bambenek created the website MahometTownship.com.
68. Although the site states that it is a parody, it is clearly directed towards Plaintiffs and other Mahomet Township officials and intended to harass, defame, demean, and intimidate them.
- Craig Anderson*
69. Craig Anderson is, upon information and belief, Brian Anderson's brother.
70. Craig Anderson will appear at Township meetings and criticize Township officials, often when Brian Anderson runs out of time.
71. At one Township Board meeting, Craig Anderson accused David of doctoring records.
72. David has not doctored records.
73. Craig Anderson's statement that David has doctored records is untrue.



74. Samantha Olson called Aaron at Aaron's employer at least twice to discuss township matters.
75. Olson was rude with Aaron's employer's office manager.
76. Olson told Aaron that she would use social media and other efforts to demean Aaron.
77. Olson later left a phone message to Aaron stating "I hope you get convicted."
- Defendants acted in concert.*
78. The above listed acts are examples; Defendants have engaged in other conduct intended to harass, defame, demean, and intimidate Plaintiffs.
79. Defendants routinely work together to harass, defame, demean, and intimidate Plaintiffs.
80. Defendants have made multiple requests for investigation to the Champaign County State's Attorney and Illinois State Police.
81. Anderson has even indicated to David that he contacted the Federal Bureau of Investigation.
82. Neither Plaintiff has been charged with any crime relating to their work for the Township.
83. Upon information and belief, Anderson and Coit have been told by the Illinois State Police to stop conducting their own investigation and to stop harassing the township.
84. Defendants coordinate submitting FOIA requests so that they do not get flagged as "recurrent requesters" or to get around one or more of the Defendants' status as a "recurrent requester." See 705 ILCS 140/3(i) (excluding requests made by recurrent requesters from the time constraints imposed by that section).
85. Defendants then share that information with each other.

86. Defendants will request the same information, using verbatim language. For example, Anderson made an undated request in or around May 2022 and Coit made the exact same request using all of the same language, salutation, and typographical errors on June 3. True and correct copies of those requests are attached as Group Exhibit 4 and incorporated by reference.
87. Upon information and belief, the Public Access Bureau of the Illinois Attorney General has designated Anderson, Coit, and Slade as a "group" for purposes of determining their status as recurrent requesters.
88. On June 29, 2022, Anderson sent a request for certain invoices "for the period April 1, 2015 through and including March 31, 2018" that purported to be from Coit. True and correct copies of those requests and the email exchange between David and Anderson are attached as Group Exhibit 5 and incorporated by reference.
89. Coit's request was denied because it was sent from Anderson's email address. See Exhibit 5.
90. Anderson then resent the same request, dated June 28, stating that "[Coit] was going to send but is out of town today" and asking David to accept and acknowledge Anderson's request. See Exhibit 5.
91. In June 2022, Defendants began sometimes requesting information from both Mahomet Township and the Mahomet Township Road District at the same time by using a header that boxed the names and address of both entities.
92. On July 13, 2022, Anderson requested all documents relating to the engagement by Mahomet Township and the Mahomet Township Road District of the law firm Sorling Northrup.

93. On July 9, Slade requested documents related to Sorling Northrup's charges from June 7, 2022 through July 13, 2022.
94. On July 15, Coit requested documents related to Sorling Northrup's charges from October 1, 2020 through September 1, 2021.
95. On September 12, 2022, Anderson submitted the verbatim request that Slade had submitted on August 18, albeit for different dates.
96. While Defendants certainly have the right to access this information, they do so in a manner intended to harass and intimidate Plaintiffs.
97. Anderson was present with Bambenek at the hearing on Bambenek's Motions to File a Quo Warranto Complaint. Anderson and Bambenek conferred after the hearing.

*Plaintiffs have suffered damages.*

98. Defendants' incessant harassment has caused Plaintiffs to suffer emotional distress.
99. This distress has manifested itself in multiple ways, including anxiety and angst.
100. Plaintiffs have been forced to seek medical treatment for the distress Defendants have caused.
101. Moreover, Plaintiffs' good names have been defamed.

**COUNT I**  
**HARASSMENT**

102. Plaintiffs restate and incorporate paragraphs 1 through 101 as if fully restated herein.
103. Defendants' conduct was and continues to be extreme and outrageous.
104. Defendants' conduct was intended to harass, defame, demean, and intimidate Plaintiffs.
105. That is, Defendants intend to inflict severe emotional distress or at least know that there is a high probability that their conduct will cause severe emotional distress.
106. The conduct has caused severe emotional distress.
107. Defendants acted together and harassed Plaintiffs on each other's behalf.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Enter judgment in their favor and against Defendants on Count I;
- B. Enter an order finding that Defendants' actions constitute harassment and intentional infliction of emotional distress;
- C. Award them compensatory damages in an amount in excess of \$50,000.00;
- D. Award them punitive damages, including an amount for their attorney fees;
- E. Award them their costs; and
- F. Grant them any other relief it finds just and equitable under the circumstances.

PLAINTIFFS DEMAND A TRIAL BY TWELVE OF THEIR PEERS.

**COUNT II**  
**ABUSE OF PROCESS**

108. Plaintiffs restate and incorporate paragraphs 1 through 101 as if fully restated herein.
109. A review of a FOIA response by the Public Access Counselor of the Attorney General's office is a quasi-judicial proceeding. See 5 ILCS 140/9.5(f) (Upon review, "the Attorney General shall examine the issues and the records, shall make finding of fact and conclusions of law," and shall issue an opinion that is binding on the requester and public body); 5 ILCS 140/11.5 ("A binding opinion issued by the Attorney General shall be considered a final decision of an administrative agency, for purposes of administrative review under the Administrative Review Law").
110. Defendants filed their FOIA requests and sought review by the Public Access Counselor for the ulterior motive of defaming, harassing, humiliating, and intimidating Plaintiffs in an unlawful manner.
111. The use of the legal process in this manner is not proper.
112. Bambenek, in filing his Quo Warranto, Special Meeting, and Open Meetings Act actions, sought not to properly enforce the law, but to defame, harass, humiliate, and intimidate

Plaintiffs, to be given Aaron's position as Township Supervisor, and to "take over" the Mahomet Township board.

113. The use of the legal process in this manner is not proper.
114. Defendants acted together and abused the legal process on each other's behalf.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Enter judgment in their favor and against Defendants on Count II;
- B. Award them compensatory damages in an amount in excess of \$50,000.00;
- C. Award them punitive damages, including an amount for their attorney fees;
- D. Award them their costs; and
- E. Grant them any other relief it finds just and equitable under the circumstances.

PLAINTIFFS DEMAND A TRIAL BY TWELVE OF THEIR PEERS.

**COUNT III**  
**DEFAMATION**

115. Plaintiffs restate and incorporate paragraphs 1 through 101 as if fully restated herein.
116. Defendants made the above-described statements and others, including that Plaintiffs committed fraud and "doctored records."
117. The intended recipients of these published statements were unprivileged third parties.
118. These statements were defamatory in that they were solely meant to suggest Plaintiffs committed crimes and lacked integrity to complete the duties of their positions, employment, or both.
119. Defendants acted with malice in publishing these statements.
120. Defendants acted together and published the statements on each other's behalf.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Enter judgment in their favor and against Defendants on Count III;
- B. Award them compensatory damages in an amount in excess of \$50,000.00;

- C. Award them punitive damages, including an amount for their attorney fees;
- D. Award them their costs; and
- E. Grant them any other relief it finds just and equitable under the circumstances.

PLAINTIFFS DEMAND A TRIAL BY TWELVE OF THEIR PEERS.

**COUNT IV**  
**FALSE LIGHT**

- 121. Plaintiffs restate and incorporate paragraphs 1 through 101 as if fully restated herein.
- 122. Defendants' statements were made publicly and directed to the public.
- 123. Defendants' statements were false.
- 124. Defendants knew that the statements were false at the time they made them or, at the least, acted with careless disregard for their falsity.
- 125. Defendants' statements were highly offensive.
- 126. Defendants' statements would be highly offensive to a reasonable person.
- 127. Defendants' statements publicly placed Plaintiffs in a false light.
- 128. Defendants acted with malice in publishing these statements.
- 129. Defendants acted together and published the statements on each other's behalf.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Enter judgment in their favor and against Defendants on Count IV;
- B. Award them compensatory damages in an amount in excess of \$50,000.00;
- C. Award them punitive damages, including an amount for their attorney fees;
- D. Award them their costs; and
- E. Grant them any other relief it finds just and equitable under the circumstances.

PLAINTIFFS DEMAND A TRIAL BY TWELVE OF THEIR PEERS.

**COUNT V**  
**CIVIL CONSPIRACY**

130. Plaintiffs restate and incorporate paragraphs 1 through 129 as if fully restated herein.
131. Defendants engaged in concerted behaviors to achieve their shared goal of defaming, harassing, humiliating, and intimidating Plaintiffs.
132. Defendants made defamatory statements to unprivileged third parties.
133. Defendants abused the legal process.
134. Defendants made public statements that portrayed Plaintiffs in a false light.
135. Defendants engaged in conduct that harassed Plaintiffs and intentionally caused them to suffer emotional distress.
136. Defendants conspired together to defame, harass, humiliate, and intimidate Plaintiffs in an unlawful manner.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Enter judgment in their favor and against Defendants on Count V;
- B. Award them compensatory damages in an amount in excess of \$50,000.00;
- C. Award them punitive damages, including an amount for their attorney fees;
- D. Award them their costs; and
- E. Grant them any other relief it finds just and equitable under the circumstances.

**PLAINTIFFS DEMAND A TRIAL BY TWELVE OF THEIR PEERS.**

Respectfully submitted,

AARON WHEELER and DAVID PARSONS, Plaintiffs

By: /s/ James J. Schmidt  
James J. Schmidt (ARDC# 6331516)  
Lauren B. McQueen (ARDC # 6331440)  
Meyer Capel, A Professional Corporation  
306 West Church Street  
P. O. Box 6750  
Champaign, IL 61826-6750

Telephone: 217/352-1800  
[jschmidt@meyercafel.com](mailto:jschmidt@meyercafel.com)  
[lmqueen@meyercafel.com](mailto:lmqueen@meyercafel.com)

**Verification**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certify as aforesaid that they verily believe the same to be true.

*aaron wheeler*  
aaron wheeler (Dec 5, 2022 16:37 CST)

Aaron Wheeler

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certify as aforesaid that they verily believe the same to be true.

*David Parsons*  
David Parsons (Dec 5, 2022 16:30 CST)

David Parsons

**Prepared by:**  
James J. Schmidt (ARDC# 6331516)  
Meyer Capel, A Professional Corporation  
306 West Church Street  
P. O. Box 6750  
Champaign, IL 61826-6750  
Telephone: 217/352-1800  
[jschmidt@meyercafel.com](mailto:jschmidt@meyercafel.com)



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

AARON WHEELER and DAVID PARSONS,

Plaintiffs,

v.

BRIAN ANDERSON, CHAD COIT, LISA  
SLADE, MARCELLA HALL, JOHN  
BAMBENEK, CRAIG ANDERSON, and  
SAMANTHA OLSON,

Defendants.

No. \_\_\_\_\_

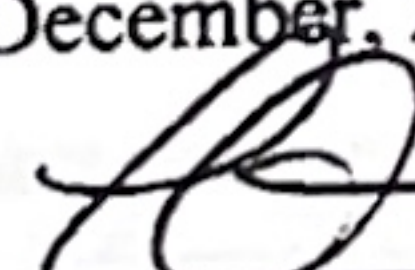
**JURY DEMANDED**

**AFFIDAVIT OF DAMAGES  
PURSUANT TO SUPREME COURT RULE 222**

The undersigned, being first duly sworn upon oath, deposes and states that he is  
Plaintiffs' attorney in the above-titled cause of action seeking money damages and states that the  
damages requested in this action exceed \$50,000.00.

  
James J. Schmidt

SUBSCRIBED AND SWORN  
to before me this 5th day  
of December, 2022.

  
Notary Public

OFFICIAL SEAL  
KIRSTEN ALEXANDRA LUYANDO MOORE  
NOTARY PUBLIC, STATE OF ILLINOIS  
MY COMMISSION EXPIRES: 07/30/2023

Prepared by:  
James J. Schmidt (ARDC #6331516)  
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306 W Church St.  
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[jschmidt@meyercafel.com](mailto:jschmidt@meyercafel.com)

Mahomet Township  
Attn: Mahomet Township FOIA Officer  
mtclerk@mahomettownship.org  
512 E. Main  
P.O. Box 492  
Mahomet, Illinois 61853

July 6, 2022

Re: Parsons Electric

FOIA Officer:

The purpose of this letter is to request information pursuant to the Illinois Freedom of Information Act (5ILCS 140), specifically (5 ILCS 140/2) subsection (g), "request" means a written document (or oral request, if the public body chooses to honor oral requests) that is submitted to a public body via personal delivery, mail, telefax, electronic mail, or other means available to the public body and that identifies the particular public record the requester seeks. One request may identify multiple records to be inspected or copied. If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

- 1) For the period April 1, 2013 through and including March 31, 2018 please provide me with an exact, unaltered copy of each and every bill and each and every invoice of any and all descriptions which were presented by **PARSONS ELECTRIC** to the Mahomet Township Road District for payment.

If these records are no longer available by any and all means generally acceptable under the Local Records Act (50ILCS 205), provide me with the official Records Disposal Certificate which granted the township the authority to legally dispose of the items I have requested.

If any part or all of the materials are withheld under a FOIA exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemptions that form the basis for any deletion from a document or the complete withholding of a document.

As provided for by the Freedom of Information Act, provide your reply within five (5) business days.

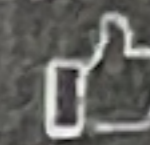
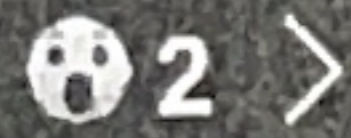
Thank you in advance for your assistance in this matter.

Chad E. Coit  
5 CR 2300 N  
Mahomet, IL 61853



11:33

🕒 4G 68%



**John Bambenek**

Hey, first time caller long-time listener, love the program. I filed, here is the press release I just sent:

**FOR IMMEDIATE RELEASE**

September 15, 2022

MAHOMET, IL - Today Mahomet Resident John Bambenek released the following statement on filing two Quo Warranto motions to remove the Mahomet Township Supervisor Aaron Wheeler and Township Clerk David Parsons from office that they resigned from on April 14th, 2022:

"On April 14th, 2022, Aaron Wheeler and David Parsons resigned from office. The locks were changed on the building, the trustees began to interview replacements. Weeks later, those politicians "rescinded" their resignations. However, it's long established law set forth by the Illinois Supreme Court that once you resign office you cannot unresign. After multiple attempts to get them to follow the law have failed, they decided in my opinion to defraud their neighbors by continuing to collect a paycheck from an office they forfeited. Unfortunately, this means a private citizen needs to take action where career politicians prefer to line their pockets and those of family members instead."

According to the Illinois Supreme Court in People ex rel. Adamowski v. Kerner, 167 NE 2d 555 - Ill: Supreme Court 1960

(see:[https://scholar.google.com/scholar\\_case?case=17156394293440444933&q=](https://scholar.google.com/scholar_case?case=17156394293440444933&q=)

Rules

Write a comment...

Mahomet Township  
Mahomet Township POA Office  
112 S. Main  
P.O. Box 491  
Mahomet, Illinois 61853

Re: 2021-2022 Road District Expenses

POA Officer:

The purpose of this letter is to request information pursuant to the Illinois Freedom of Information Act (5 ILCS 140). If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

**From:** John Bambenek  
**To:**  
**Sent:** Tuesday, November 15, 2022 at 10:32:21 PM CST  
**Subject:** Media Request

Mr. Wheeler-

ARW	9/14/21	4405		\$15,000.00
Sheriff Doeuz	6/14/21	5157	tractor	\$90,000.00
Diced Lap Top LLC	1/26/21	4414	weather	\$ 2,400.00
	1/12/21	11549	Maint Road	\$ 2,000.00

I'm a reporter for Mahomet Leaks. Do you have any comment on the attached police report. If you could let me know by close of business tomorrow, I can include your perspective in my story.

If any part or all of the materials are withheld under a FOIA exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemption that forms the basis for any deletion from a document or the complete withholding of a document.

Thanks,

J

As provided for by the Freedom of Information Act, provide your reply within five (5) business days.

Brian K. Anderson  
2700 College  
Mahomet, Illinois 61854



Mahomet Township  
Mahomet Township FOIA Officer  
512 E. Main  
P.O. Box 492  
Mahomet, Illinois 61853

Re: 2021-2022 Road District Expenses

FOIA Officer:

The purpose of this letter is to request information pursuant to the Illinois Freedom of Information Act (5ILCS 140). If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

Provide a description of each item or items purchased along with an exact, unaltered copy of each and every invoice, bill, or demand for payment, of any and all descriptions, for each of the following expenditures which are listed on the Road District's various income and expense reports for the fiscal year '21-'22:

AHW	9/14/21	4405		\$15,000.00
AHW	9/14/21	3107	tractor	\$90,000.00
Sherith Doenitz	10/26/21	4414	weather	\$ 2,430.00
Diesel Lap Top LLC	1/12/22	11349	Maint Road	\$ 2,695.00

If any part or all of the materials are withheld under a FOIA exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemptions that form the basis for any deletion from a document or the complete withholding of a document.

As provided for by the Freedom of Information Act, provide your reply within five (5) business days.

Brian K Anderson  
2398 CR 0E  
Mansfield, Illinois 61854

EXHIBIT  
4-1

Mahomet Township  
Mahomet Township FOIA Officer  
512 E. Main  
P.O. Box 492  
Mahomet, Illinois 61853

June 3, 2022

June 3, 2022

Re: 2021-2022 Road District Expenses

FOIA Officer:

The purpose of this letter is to request information pursuant to the Illinois Freedom of Information Act (5ILCS 140). If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

Provide a description of each item or items purchased along with an exact, unaltered copy of each and every invoice, bill, or demand for payment, of any and all descriptions, for each of the following expenditures which are listed on the Road District's various income and expense reports for the fiscal year '21-'22:

AHW	9/14/21	4405		\$15,000.00
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Sherith Doenitz	10/26/21	4414	weather	\$ 2,430.00
Diesel Lap Top LLC	1/12/22	11349	Maint Road	\$ 2,695.00

If any part or all of the materials are withheld under a FOIA exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemptions that form the basis for any deletion from a document or the complete withholding of a document.

As provided for by the Freedom of Information Act, provide your reply within five (5) business days.

Chad Coit  
5 CR 2300 N  
Mahomet, IL 61853

*Denial - sent per Coit*  
*Andrew E. Coit*

**EXHIBIT**  
**4-2**

# 12

June 29, 2022

Mahomet Township  
Attn: Mahomet Township FOIA Officer

512 E. Main  
P.O. Box 492  
Mahomet, Illinois 61853

Re: 2015-2018 Invoices

FOIA Officer:

The purpose of this letter is to request information pursuant to the Illinois Freedom of Information Act (5ILCS 140), specifically (5 ILCS 140/2) subsection (g), "request" means a written document (or oral request, if the public body chooses to honor oral requests) that is submitted to a public body via personal delivery, mail, telefax, electronic mail, or other means available to the public body and that identifies the particular public record the requester seeks. One request may identify multiple records to be inspected or copied. If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

For the period April 1, 2015 through and including March 31, 2018, provide an exact, unaltered copy of each and every invoice, bill, or demand for payment, of any and all descriptions which have been received and paid for with funds of the Mahomet Township Road District or Mahomet Township for the following described expenditures:

- June 15, 2017 Midwest Fence \$9,069.00
- Oct. 17, 2017 Midwest Fence \$14,545.00
- Mar. 8, 2017 Scheid Diesel \$ 1,174.60

If any or all these records are no longer available by any and all means generally acceptable under the Local Records Act (50ILCS 205), provide me with the official Records Disposal Certificate which granted the township the authority to legally dispose of the items.

If any part or all of the materials are withheld under a FOIA exemption, please provide a list of the information withheld and mark any deleted sections. Please list the specific exemptions that form the basis for any deletion from a document or the complete withholding of a document.

As provided for by the Freedom of Information Act, provide your reply within five (5) business days.

Chad Coit  
5 County Road 2300 N  
Mahomet, IL 61853

*Denise - sent from Brian Anderson's E-Mail*

**EXHIBIT**  
**5-1**

## Mahomet Township Clerk

---

**From:** b a <bka57@hotmail.com>  
**Sent:** Wednesday, June 29, 2022 11:38 AM  
**To:** Mahomet Township Clerk  
**Subject:** Re: FOIA REQUEST

I hope this cleared up your confusion Dave and allows you to accept and acknowledge the changes as provided.  
Brian

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

---

**From:** b a <bka57@hotmail.com>  
**Sent:** Wednesday, June 29, 2022 10:39:17 AM  
**To:** Mahomet Township Clerk <mtclerk@mahomettownship.org>  
**Subject:** Re: FOIA REQUEST

Sorry about that.....Chad was going to send but is out of town today.  
Please accept and acknowledge the attached FOIA request.

Brian Anderson

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**From:** Mahomet Township Clerk <mtclerk@mahomettownship.org>  
**Sent:** Wednesday, June 29, 2022 10:35 AM  
**To:** b a <bka57@hotmail.com>  
**Cc:** Steve Mahrt <smahrt@ancelglink.com>  
**Subject:** RE: FOIA REQUEST

I am confused, this FOIA is from Mr. Anderson but signed by Chad Coit?

David

This email is from Mr. Anderson but the FOIA

**From:** b a <bka57@hotmail.com>  
**Sent:** Wednesday, June 29, 2022 10:23 AM  
**To:** Mahomet Township Clerk <mtclerk@mahomettownship.org>  
**Subject:** FOIA REQUEST

David,  
Please accept and acknowledge the attached FOIA request.

Brian Anderson