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VIA ELECTRONIC & U.S. MAIL

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Re: Cease and Desist

Counselors:

Please be advised that I represent Ms. Rayya A. Ghani, the lawfully and duly elected President and Board Member of Dolton School District 149.

As you are well aware, your client, the Board of Education of Dolton School District 149 (the “Board”), claims it has removed Ms. Ghani from her positions as President and Member of the Board. The Board now refuses to recognize Ms. Ghani’s lawful status, has illegally declared her Board position vacant and then proceeded to unlawfully replace her on the Board with another individual.

As an initial matter, the so-called “charges” leveled against Ms. Ghani by her political opponents are false and without merit. But I need not even waste time here dignifying the false allegations pursued by persons who are clearly driven only by corrupt motives and/or a lust for petty political retaliation.

The only relevant point for us here is that the Board has absolutely no lawful authority to take the actions it purports to have taken against Ms. Ghani. The Board has certainly failed to provide any such legal basis. The statements by the Board that it has “convicted” Ms. Ghani of any kind of wrongdoing are absurd. Such a preposterous suggestion is blatantly in violation of not only Illinois law, but also the Constitution of both the State of Illinois and the United States.

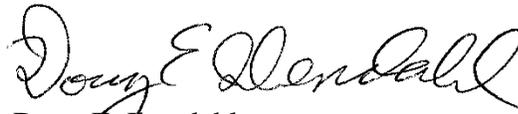
The Board simply has no lawful power to effectuate the scheme it is attempting against Ms. Ghani, and we are at a loss to find any precedent in Illinois which would lend a scintilla of support for lawfully carrying-out such a scheme. *Brown v. Johnson*, 362 Ill. App. 3d 413 (1st Dist. 2005) certainly has no application here. That case was limited to a question of residency, and non-residency is a specifically designated and valid cause for finding an office vacant.

Nothing comparable to *Brown* exists here. The Board's inexplicable decision to declare itself sheriff, judge and jury for the sole purpose of rendering "convictions" on trumped-up allegations is incredible. Frankly I am astounded that any attorney would be part of such a scheme where a school board puts itself into the shoes of not only law enforcement, but also the judiciary branch, and purports to render "convictions." The multiple harms to Ms. Ghani's civil rights are substantial and blatantly obvious.

This letter shall serve as a demand that your client cease and desist its unlawful and unconstitutional actions against Ms. Ghani. My client does not waive her right to pursue all lawful remedies under state and federal law for the harm already inflicted upon her by your client's outrageous actions. However, we do urge your client to immediately take action to restore the lawful status quo so that further harm to Ms. Ghani is minimized.

Expect my call on Monday to further discuss this urgent matter.

Sincerely,



Doug E. Bendahl

cc: Attorney General Kwame Raoul