

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION**

JASON HOUSE, BRITTNEY NORWOOD,)
KIANA BELCHER, and TAMMY BROWN,)
as Village Trustees and as residents of)
the Village of Dolton, and ALISON KEY,)
as Village Clerk,)

Plaintiffs,)

v.)

TIFFANY HENYARD, as Mayor of the Village)
of Dolton,)

Defendant.)

Case No. 2023 CH 10204

Calendar 5

**MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR
PRELIMINARY INJUNCTION**

Plaintiffs Jason House, Brittney Norwood, Kiana Belcher, Tammy Brown and Alison Key, by their attorneys, Odelson, Murphey, Frazier & McGrath, Ltd., and for their Motion for Temporary Restraining Order and/or Preliminary Injunction, state as follows:

1. Plaintiffs Trustees have filed a Verified Complaint seeking mandamus, declaratory and injunctive relief and an accounting in this matter.
2. For the reasons set forth in detail in the Memorandum of Law in Support of Their Motion for Temporary Restraining Order and Preliminary Injunction filed concurrently with this Motion, Plaintiffs have a protectable right and will suffer irreparable harm if injunctive relief is not granted; a remedy at law is inadequate, and there is a likelihood of success on the merits.

WHEREFORE, Plaintiffs respectfully request that this Court grant them the following relief for the reasons set forth in its Memorandum of Law in Support of their Motion for Temporary Restraining Order and Preliminary Injunction:

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- a) directing the Mayor to immediately take all necessary action to add Clerk Key as a signatory on all Village accounts with Fifth Third Bank and any other banking institution, and remove all other individuals other than the Defendant;
- b) directing the Mayor to cause the Trustees to have access to view all monthly banking statements of all Village accounts, either via online access or providing printed or emailed copies every month;
- c) directing the Mayor to cause the Trustees to have access to My Viewpoint; or alternatively provide Trustees with printed or emailed copies of all invoices and receipts for every expenditure to be approved by the Board, at least 48 hours prior to the start of the Board meeting where the expenditure is listed on the agenda for approval;
- d) directing the Mayor to provide all statements for all Village credit cards from May, 2023 going forward;
- e) directing the Mayor to cause payroll reports to be provided to the Village Trustees on a monthly basis, and at least 48 hours prior to the start of the Board meeting where approval of payroll is listed on the agenda;
- f) directing the Mayor to cause the Trustees to receive monthly financial reports;
- g) enjoining the Mayor from issuing any check for payment from Village funds unless (1) payment been approved by the Village Board; and (2) the check contains the signature of both the Defendant and Clerk Key;
- h) directing the Mayor to sign checks for all invoices approved for payment by the corporate authorities and give them to the Clerk for her signature;
- i) directing that the Village undertake an accounting of all Village accounts, including all payments issued from said accounts since 2021; and
- j) granting all such further relief to the Plaintiffs that the Court deems just.

Respectfully submitted,

**HOUSE, NORWOOD, BELCHER,
BROWN and KEY**

By: /s/ Michael J. McGrath
One of their attorneys

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