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

TIFFANY HENYARD, as Mayor of the
Village of Dolton,
STANLEY BROWN and **ANDREW HOLMES**,
as Trustees of the Village of Dolton,

Plaintiffs

v.

ALISON KEY, as Village Clerk of the Village
of Dolton; **TAMMIE BROWN**,
BRITTNEY NORWOOD, **JASON HOUSE**,
and **KIANA BELCHER**, as Trustees of the
Village of Dolton; and **KEITH FREEMAN**, as
the Village Administrator of the Village of
Dolton, and the
DOLTON PARK DISTRICT,

Defendants,

FILED
10/8/2024 4:42 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2024CH09335
Calendar, 2
29702294

No. 2024CH09335

COMPLAINT
FOR DECLARATORY JUDGMENT AND INJUNCTION

NOW COMES the Defendants, Tiffany Henyard, Stanley Brown, and Andrew Holmes, by and through counsel, pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/2-701 and 5/11-101 *et seq.*, and file their verified complaint against the Defendants Alison Key, Tammie Brown, Brittney Norwood, Jason House, Kiana Belcher, Keith Freeman, and the Dolton Park District. As grounds, Plaintiffs state as follows:

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PARTIES AND JURISDICTION

1. The Village of Dolton ["Village"] is a municipal corporation whose main office and principal place of business is located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois.
2. Plaintiff TIFFANY HENYARD is the duly elected mayor of the Village.
3. Plaintiff STANLEY BROWN is a duly elected trustee of the Village and one of the six (6) duly elected trustees of the Village.
4. Plaintiff ANDREW HOLMES is a duly elected Trustee of the Village and one of the six (6) duly elected Trustees of the Village.
5. Defendant ALISON KEY is the duly elected Clerk of the Village of Dolton.
6. Defendant TAMMIE BROWN is a duly elected Trustee of the Village and one of the six (6) duly elected Trustees of the Village.
7. Defendant BRITTENY NORWOOD is a duly elected Trustee of the Village and one of the six (6) duly elected Trustees of the Village.
8. Defendant JASON HOUSE is a duly elected Trustee of the Village and one of the six (6) duly elected Trustees of the Village.
9. Defendant KIANA BELCHER is a duly elected Trustee of the Village and one of the six (6) duly elected Trustees of the Village.
10. Defendant KEITH FREEMAN is the appointed village administrator for the Village.
11. Defendant DOLTON PARK DISTRICT is a special district unit of government and taxing body, with its own duly elected governing body, and whose main office and

principal place of business is located at the “Lester Long Building,” 14700 S. Evers, Dolton, Illinois 60419.

APPLICABLE LAW

12. The Illinois Open Meetings Act, 5 ILCS 120/1 *et seq.* provides and requires that:

“All meetings required by the Act to be public shall be held at specified times and places which are convenient and open to the public.” Section 2.01; and that:

“Every public body shall give public notice of the schedule of regular meetings at the beginning of each calendar or fiscal year and shall state the regular dates, times, and places of such meetings.” Section 2.02; and that:

“[E]ach body subject to this Act must, at the beginning of each calendar or fiscal year, prepare and make available a schedule of all its regular meetings for such calendar or fiscal year, listing the times and places of such meetings.” Section 2.03.

BACKGROUND AND FACTS

13. The Village of Dolton is a “public body” as defined by the Illinois Open Meetings Act (see Section 120/1.02), whose “meetings,” as defined by the same, is thus subject to and governed by the Open Meetings Act.

14. The regular meeting of the board of trustees¹ for the Village of Dolton is held every first Monday of the month at 630pm. That meeting, and all other meetings, of the

¹ Board of trustees for Illinois Villages consists of the mayor and the trustees. See 65 ILCS 5/3.1-45-5.

board of trustees are scheduled to be so held at the main office and principal place of business of the Village of Dolton (the Village Hall) located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois.

15. The village clerk is statutorily required to attend, be present, and to perform specific duties as prescribed by statute and ordinances at every meeting of the board of trustees.
16. The regular meeting, and all meetings, of the board of trustees for the Village of Dolton has been held, always been held, and has been known by the residents of the Village of Dolton to be held, at the main office and principal place of business of the Village of Dolton (the Village Hall) located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois.
17. On September 3, 2024, the Illinois Attorney General's Office issued "Public Access Opinion 24-010" to the board of trustees directing the board to "take immediate and appropriate action to comply with this opinion by taking measures to make all future meetings convenient and open to the public, including holding meetings at a location with enough space to be reasonably accessible and configuring the meeting set-up to accommodate the public. Although the Board is permitted to take reasonable and appropriate measures to ensure the safety of members of the public and public officials, it is directed to refrain from unnecessary security measures such as street closures, parking barricades, and an excessive police presence that physically impedes members of the public from reaching Village Hall and/or creates a hostile

atmosphere that may deter the public from attending meetings.” The Opinion is attached to this complaint and identified as Exhibit A.

18. On the morning of October 4, 2024, acting upon the Illinois Attorney General’s “Public Access Opinion 24-010,” mayor Henyard directed, via written communication to Defendant Keith Freeman, the village administrator to, in essence, direct resources to ensure compliance with “Public Access Opinion 24-010. The letter is attached to this complaint and identified as Exhibit B.
19. Defendant Keith Freeman refused to acknowledge the written directives of the mayor, refused to act as directed, and refused to communicate in any way, shape, or form with the mayor.
20. Nevertheless, the mayor engaged the voluntary help and assistant of William Moore, the housing director for the Village of Dolton to make sure the Village Hall is prepared and made ready for the regular board meeting scheduled for Monday, October 7, 2024 in compliance with the “Public Access Opinion 24-010.”
21. On October 4, 2024, the agenda for the meeting to be held on October 7, 2024 was conspicuously posted on the doors at the entrance of the Village Hall as required by Village ordinance and the Illinois Open Meetings Act. A copy of the posted agenda is attached to this complaint and identified as Exhibit C.
22. On that same day, October 4, 2024, another meeting agenda and presumably, a CALL, for a “Regular Meeting Board of Trustees” to be held at “Dolton Park District Lester Long Building, 14700 S. Evers, Dolton, IL 60419,” on the letterhead of the Village of

Dolton, was mysteriously posted on the same doors next to the meeting agenda earlier posted. The agenda (and Call) was signed by Defendants Brittney Norwood, Kiana Belcher, and Tammie Brown. A copy of said Trustees' agenda is attached to this complaint and identified as Exhibit D.

23. Defendant Alison Key, the village clerk, was not present for work at the Village Hall on October 4, 2024, and had not been present for work at the Village Hall for weeks, if not months, prior to October 4, 2024.
24. Defendant Keith Freeman, the village administrator was not present for work at the Village Hall on October 4, 2024, and had not been present for work at the Village Hall for weeks, if not months, prior to October 4, 2024.
25. Upon information and belief, the trustees – Defendants Brittney Norwood, Kiana Belcher, and Tammie Brown – who called the parallel meeting to be held at the Dolton Park District and prepared a parallel agenda for the same, were acting upon the instruction and order of Defendant Jason House, a trustee (as mayor pro tem²).
26. On October 7, 2024, the Village Hall was prepared and ready in compliance with “Public Access Opinion 24-010” for the regular meeting of the board of trustees to be held there as regularly scheduled. At about 615pm, residents and Village officials

² Trustee Jason House had been declared mayor pro tem by order of court in another case – 2023CH10204 – but only for the very narrow and specific purpose of the matter pertinent to that specific case.

started arriving at the Village Hall for the regular meeting of the board, including members of the news media.

27. Plaintiffs, in their official capacities also arrived for the board meeting and were present and ready to proceed to conduct the business of and for the Village of Dolton. The Village officials that were present are Pete McCain, fire chief; Terry Young, police sergeant; William Moore, housing director; and Stacey Carrel.
28. As at about 7pm on October 7, 2024, Defendant Alison Key, as village clerk; Defendants Brittney Norwood, Kiana Belcher, Jason House, and Tammie Brown, as trustees; and Keith Freeman, as village administrator, had not arrived and were not present for the regular meeting and for conducting the business of and for the Village of Dolton.
29. Having no quorum to call the meeting to order, mayor Henyard addressed the public and informed them of the lack of quorum, therefore, that the meeting would unfortunately have to be canceled.
30. It was then brought to the attention of the mayor that the parallel meeting called by the trustees and Jason House as mayor pro tem, was in fact being conducted at the Dolton Park District.
31. Out of abundance of caution and given that the mayor is the one authorized by law to preside over meetings of the board, and given that several businesses of the Village need conducting and executing, the mayor proceeded to go to the Dolton Park District in an attempt to preside over that meeting as required by law and, most importantly,

to conduct the business of the Village of Dolton including to make appointments, as the mayor is statutorily vested and required to do, to the vacant appointed positions of police chief, amongst others.

32. Upon arrival at the Dolton Park District at the parallel meeting called by the Defendant trustees, it was discovered that the Defendant trustees, Defendant village clerk, along with attorney Mike McGrath, were seated and conducting business, including voting on and passing ordinances. Defendant Jason House was presiding over the meeting as “mayor pro tem.”
33. The mayor’s attempt to then preside over the meeting and participate in it was met with chaos, jeers, and disruptions, condoned and encouraged by the Defendant village clerk and trustees.
34. Upon information and belief, it has been claimed and it is being claimed by the Defendants village clerk, village trustees, and village administrator that the Illinois Attorney General’s “Public Access Opinion 24-010” serves as basis and conclusion that board meetings can no longer be held at the Village of Dolton’s main office and primary place of business located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois.

COUNT I: DECLARATORY AND INJUNCTIVE RELIEF
As to Defendant ALISON KEY, as Village Clerk

35. Plaintiffs restate and reallege paragraphs 1-34 as if fully set forth herein.
36. An actual controversy does now exist between the Plaintiffs and Defendant village clerk in that “Public Access Opinion 24-010” is being separately interpreted and

treated by the Defendants to justify her preposition that meetings can no longer be held at the Village Hall - to the detriment of the smooth running and functioning of the Village of Dolton, causing disruptions and chaos resulting in a disservice to the people and residents of the Village of Dolton.

37. The Plaintiffs have a clearly ascertainable right to function and to discharge their legally assigned duties in the capacity of their respective public offices held and as publicly elected officials.
38. Plaintiffs, and the residents of Dolton are suffering and will suffer irreparable and irredeemable harm if this controversy were to continue.
39. Plaintiffs have no adequate remedy at law.
40. The Defendant village clerk's supposed position that "Public Access Opinion 24-010" stands for the conclusion that board meetings can no longer be held at the Village Hall is grossly unreasonable and in violation of the Illinois Open Meetings Act.

WHEREFORE, for all the foregoing reasons, Plaintiffs humbly and respectfully request that this Honorable Court enter an order:

- A. Declaring that "Public Access Opinion 24-010" of the Illinois Attorney General does not hold that board meetings can no longer be held at the Village Hall.
- B. Declaring that the Village Hall located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois is the main office and primary place of business for the Village of Dolton and for the purposes of the Illinois Open Meetings Act.

- C. Enjoining the village clerk from continuing to post or participate in the posting of any notices or announcements holding the Dolton Park District out as the primary place of business of the Village of Dolton for the purpose on conducting Village business.
- D. Enjoining the village clerk from acting, to the extent that she is required to do so by law, upon any final decisions made or voted on at the meeting held at the Dolton Park District on October 7, 2024, including any resolutions or ordinances passed at that meeting.
- E. And for any other reliefs as this Honorable Court may deem just and proper.

COUNT II: DECLATORY AND INJUNCTIVE RELIEF

As to Defendants Tammie Brown, Brittney Norwood, Jason House, and Kiana Belcher

- 41. Plaintiffs restate and reallege paragraphs 1-34 as if fully set forth herein.
- 42. An actual controversy does now exist between the Plaintiffs and Defendant village trustees in that “Public Access Opinion 24-010” is being separately interpreted and treated by the Defendants to justify their preposition that meetings can no longer be held at the Village Hall - to the detriment of the smooth running and functioning of the Village of Dolton, causing disruptions and chaos resulting in a disservice to the people and residents of the Village of Dolton.
- 43. The Plaintiffs have a clearly ascertainable right to function and to discharge their legally assigned duties in the capacity of their respective public offices held and as publicly elected officials.

44. Plaintiffs, and the residents of Dolton are suffering and will suffer irreparable and irredeemable harm if this controversy were to continue.

45. Plaintiffs have no adequate remedy at law.

46. The Defendant village trustees' supposed position that "Public Access Opinion 24-010" stands for the conclusion that board meetings can no longer be held at the Village Hall is grossly unreasonable and in violation of the Illinois Open Meetings Act.

WHEREFORE, for all the foregoing reasons, Plaintiffs humbly and respectfully request that this Honorable Court enter an order:

- A. Declaring that "Public Access Opinion 24-010" of the Illinois Attorney General does not hold that board meetings can no longer be held at the Village Hall.
- B. Declaring that the Village Hall located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois is the main office and primary place of business for the Village of Dolton and for the purposes of the Illinois Open Meetings Act.
- C. Enjoining the village trustees continuing to post or participate in the posting of any notices or announcements holding the Dolton Park District out as the primary place of business of the Village of Dolton for the purpose on conducting Village business.
- D. Declaring that the parallel meeting called by the trustees and held on October 7, 2024, at the Dolton Park District including any such regular or special meetings that may have been called and held at that same location from and since September 3, 2024, if any, are invalid, null, and to be voided.

- E. Enjoining the village trustees from acting, to the extent that they are required to do so by law, upon any final decisions made or voted on at the meeting held at the Dolton Park District on October 7, 2024, including any resolutions or ordinances passed at that meeting.
- F. And for any other reliefs as this Honorable Court may deem just and proper.

COUNT III: DECLARATORY AND INJUNCTIVE RELIEF
As to Defendant Dolton Park District

- 47. Plaintiffs restate and reallege paragraphs 1-34 as if fully set forth herein.
- 48. An actual controversy does now exist between the Plaintiffs and Defendant Dolton Park District insofar as the district can be perceived as aiding, abetting, and encouraging conflict among the members of the board of trustees of the Village of Dolton by making their facilities and properties available for the parallel meeting of October 7, 2024, and any other meeting prior to that, to be held there.
- 49. The Plaintiffs have a clearly ascertainable right to function and to discharge their legally assigned duties in the capacity of their respective public offices held and as publicly elected officials.
- 50. Plaintiffs, and the residents of Dolton are suffering and will suffer irreparable and irredeemable harm if this controversy were to continue.
- 51. Plaintiffs have no adequate remedy at law.
- 52. Defendant Dolton Park District's action in making its facilities and properties available to the Defendant village clerk, village trustees, and village manager can only

go to fester and encourage continued division between the members of the board of trustees for the Village of Dolton and to a disservice to the people of Dolton.

WHEREFORE, for all the foregoing reasons, Plaintiffs humbly and respectfully request that this Honorable Court enter an order:

- A. Declaring that the Village Hall located at 14122 Martin Luther King Jr. Drive, Dolton, Illinois is the main office and primary place of business for the Village of Dolton and for the purposes of the Illinois Open Meetings Act.
- B. Enjoining the Dolton Park District from making its properties and facilities available for future parallel meetings of the board of trustees for the Village of Dolton.
- C. And for any other reliefs as this Honorable Court may deem just and proper.

Respectfully Submitted,
Tiffany Henyard
Stanley Brown
Andrew Holmes

By: /s/ McStephen O. A. Solomon
Their Attorney

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