

FILED DATE: 1/10/2025 1:00 PM 2025CH00258

**Chancery Division Civil Cover Sheet**  
**General Chancery Section**

(12/01/24) CCCH 0623

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

Tiffany A. Henyard  
Plaintiff  
v.  
Christopher D. Gonzalez, and Carmen R. Carlisle  
Defendant

Case No: 2025CH00258

**CHANCERY DIVISION CIVIL COVER SHEET**  
**GENERAL CHANCERY SECTION**

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

- 0005  Administrative Review
- 0001  Class Action
- 0002  Declaratory Judgment
- 0004  Injunction
- 0007  General Chancery
- 0010  Accounting
- 0011  Arbitration
- 0012  Certiorari
- 0013  Dissolution of Corporation
- 0014  Dissolution of Partnership
- 0015  Equitable Lien
- 0016  Interpleader
- 0017  Mandamus
- 0018  Ne Exeat
- 0019  Partition
- 0020  Quiet Title
- 0021  Quo Warranto
- 0022  Redemption Rights
- 0023  Reformation of a Contract
- 0024  Rescission of a Contract
- 0025  Specific Performance
- 0026  Trust Construction
- 0050  Internet Take Down Action (Compromising Images)
- Other (specify) \_\_\_\_\_

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Pro Se Only:  I have read and agree to the terms of the Clerk's Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – CHANCERY DIVISION

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**TIFFANY A. HENYARD**, as Supervisor of the )  
Township of Thornton, )

Plaintiff )

v. )

No. 2025CH00258

**CHRISTOPHER D. GONZALEZ**, as )  
Trustee of the Township of Thornton, *and* )

**CARMEN R. CARLISLE**, as Trustee of the )  
Township of Thornton )

Defendants, )

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**VERIFIED COMPLAINT IN MANDAMUS**

COMES NOW, TIFFANY A. HENYARD, as, and in her capacity as Supervisor of the Township of Thornton, Cook County, State of Illinois, by and through her undersigned attorney, pursuant to the Illinois Code of Civil Procedure 735 ILCS 5/14-101 *et seq*, and bring this Complaint in Mandamus against defendants CHRISTOPHER D. GONZALEZ and CARMEN R. CARLISLE, both, as, and in their capacity as Trustees of the Township of Thornton, Cook County, State of Illinois. As grounds, plaintiff states as follows:

**PARTIES AND JURISDICTION**

1. Plaintiff TIFFANY A. HENYARD is the duly appointed/elected and current Supervisor of the Township of Thornton – a unit of (township) government organized under the laws of the State of Illinois in Cook County, State of Illinois, and a resident of Cook County, State of Illinois.

FILED DATE: 1/10/2025 1:00 PM 2025CH00258

2. Defendant CHRISTOPHER D. GONZALEZ is a duly appointed/elected and current Trustee of the Township of Thornton – a unit of (township) government organized under the laws of the State of Illinois in Cook County, State of Illinois, and a resident of Cook County, State of Illinois.
3. Defendant CARMEN R. CARLISLE is a duly appointed/elected and current Trustee of the Township of Thornton – a unit of (township) government organized under the laws of the State of Illinois in Cook County, State of Illinois, and a resident of Cook County, State of Illinois.

#### **APPLICABLE LAWS**

4. This complaint is brought under authority and provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/14-101 *et seq.*; and the Illinois Township Code, 60 ILCS 1/1-1, *et seq.*

#### **BACKGROUND FACTS**

5. As provided in the Illinois Township Code, 60 ILCS 1/80-5, the “Township Board” or “Township Officers” of Thornton Township, Cook County, Illinois, consists of one (1) Township Supervisor and four (4) Township Trustees.
6. The “Township Board” are either appointed or elected at large to serve a specific term in office.
7. Tiffany A. Henyard, appointed on March 3, 2022, is the current Supervisor for Thornton Township.
8. Darlene Gray Everett, elected in April 2021 to a term of four (4) years, is a current Trustee for Thornton Township.

9. Christopher D. Gonzalez, elected in April 2021 to a term of four (4) years, is a current Trustee for Thornton Township.
10. Carmen R. Carlisle, appointed on May 31, 2023, is a current Trustee for Thornton Township.
11. Gerald Jones, elected in April 2021 to a term of four (4) years, was a Trustee for Thornton Township, who tendered his resignation from this position on, and effective, October 7, 2024, therefore, creating a vacancy.
12. Thus, the current Township Board for Thornton Township consists of the Supervisor and three (3) Trustees, namely: Tiffany A. Henyard, Darlene Gray Everett, Christopher D. Gonzalez, and Carmen R. Carlisle, with one vacancy in the office of Trustee for Thornton Township.
13. The Illinois Township Code, 60 ILCS 1/80-10, provides, *inter alia*, that the Township Board “shall meet ... for the purpose of examining and auditing the township accounts ... before any bills are paid ...” 60 ILCS 1/80-10(a).
14. The Illinois Township Code, 60 ILCS 1/80-15, provides, *inter alia*, that the “township board shall, at the same time and place stated in Section 80-10, examine the accounts ... examine and audit ... charges and claims ... and compensation ...” 60 ILCS 1/80-15(b).
15. The Illinois Township Code, 60 ILCS 1/80-50, provides, *inter alia*, that “accounts **audited** shall be paid by the supervisor within 20 days after presentation ...” 60 ILCS 1/80-50(a).

16. Thus, meetings of the Township Board of Thornton Township are mandated by the Illinois Township Code and are absolutely essential, crucial, and necessary to the smooth running of the day-to-day operations of Thornton Township, even up to and including the management and compensation of staff and employees, and most importantly, to the smooth uninterrupted flow of the vital and essential services that Thornton Township provides to its residents, including its senior citizens.

17. Meetings of the Township Board for Thornton Township are regularly scheduled for every 2nd and 4th Tuesday of every month at 6:00pm, in addition to any other meeting (“special meeting”) that may be called pursuant to the provisions of 60 ILCS 1/80-10(b).

18. However, the Township Board for Thornton Township have not been able to meet to conduct the business of Thornton Township since October 2024 to present [the “relevant times”] due to lack of a quorum of the Township Board for all scheduled meetings at all the relevant times.

**COUNT I – MANDAMUS ACTION**  
**vs. Defendant Christopher D. Gonzalez**

19. Plaintiff, TIFFANY A. HENYARD, [“HENYARD”], in her capacity as the Supervisor of Thornton Township, restates and realleges paragraphs 1-18 as if fully set forth herein.

20. At all relevant times, Defendant, CHRISTOPHER D. GONZALEZ, was, and still is, a duly elected Trustee and member of the Township Board for Thornton Township, Cook County, State of Illinois.

21. By virtue of his election and membership in the Township Board for Thornton Township, Defendant, CHRISTOPHER D. GONZALEZ, has the legal duties and obligations as prescribed and vested by the provisions of the Illinois Township Code, and to fully and faithfully discharge such duties and obligations according to law.

22. A regular meeting of the Township Board for Thornton Township was scheduled to be held on Tuesday, October 8, 2024, at 6pm.

23. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the regular meeting scheduled for Tuesday, October 8, 2024.

24. A regular meeting of the Township Board for Thornton Township was scheduled to be held on Thursday, October 22, 2024, at 6pm.

25. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the regular meeting scheduled for Thursday, October 22, 2024.

26. A special meeting of the Township Board for Thornton Township was scheduled to be held on Wednesday, October 30, 2024, at 6pm.

27. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend<sup>1</sup> the special meeting scheduled for Thursday, October 30, 2024.

28. A regular meeting of the Township Board for Thornton Township was scheduled to be held on Tuesday, November 19, 2024, at 6pm.

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<sup>1</sup> Defendant initially showed up for the meeting but left, therefore, no quorum was formed.

29. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the regular meeting scheduled for Tuesday, November 19, 2024.

30. A special meeting of the Township Board for Thornton Township was scheduled to be held on Monday, November 25, 2024, at 6pm.

31. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Monday, November 25, 2024.

32. A special meeting of the Township Board for Thornton Township was scheduled to be held on Thursday, December 5, 2024, at 6pm.

33. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Thursday, December 5, 2024.

34. A special meeting of the Township Board for Thornton Township was scheduled to be held on Tuesday, December 17, 2024, at 6pm.

35. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Tuesday, December 17, 2024.

36. A special meeting of the Township Board for Thornton Township was scheduled to be held on Monday, December 30, 2024, at 6pm.

37. Defendant, CHRISTOPHER D. GONZALEZ, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Monday, December 30, 2024.
38. CHRISTOPHER D. GONZALEZ's deliberate, intentional, and purposeful failure and refusal to attend all the above-mentioned meetings caused a lack of quorum, thereby preventing any meeting to be held and for any business of the Township to be conducted.
39. Defendant, CHRISTOPHER D. GONZALEZ, has made several public comments and gave several interviews to the media acknowledging that his failure and refusal to attend the scheduled meetings were deliberate, intentional, and purposeful. See [Here](#) and [Here](#).
40. Defendant, CHRISTOPHER D. GONZALEZ, has publicly declared that he would not be attending any more meetings of the Township Board for Thornton Township. See [Here](#)
41. Thus, Defendant, CHRISTOPHER D. GONZALEZ, has failed and refused, and will continue to fail and refuse, to fully and faithfully discharge his legal duties and obligations as vested upon him by law and by virtue of his election to the office of Trustee of the Thornton Township.
42. CHRISTOPHER D. GONZALEZ's failure and refusal, and continued failure and refusal, to fully and faithfully discharge his legal duties and obligations as vested upon him by law and by virtue of his election to the office of Trustee of the Thornton Township has caused a severe disruption of township services, a



severe disruption of the day-to-day functions, management, and operations of Thornton Township, and, in fact, a shut-down of Thornton Township.

43. As a result of CHRISTOPHER D. GONZALEZ's failure and refusal, and continued failure and refusal, to fully and faithfully discharge his legal duties and obligations as vested upon him by law and by virtue of his election to the office of Trustee of the Thornton Township, the residents of Thornton Township and the beneficiaries of the services provided by Thornton Township have suffered and are continuing to suffer hardships and inconveniences, including residents with serious medical conditions who depend on the transportation services offered by Thornton Township. *See [Here](#).*

44. As a result of CHRISTOPHER D. GONZALEZ's failure and refusal, and continued failure and refusal, to fully and faithfully discharge his legal duties and obligations as vested upon him by law and by virtue of his election to the office of Trustee of the Thornton Township, all the insurance policies of several properties, including buildings and vehicles, of Thornton Township have lapsed, resulting in a total shut down of buildings, and cessation of transport services provided by Thornton Township. *See [Here](#).*

**WHEREFORE**, Plaintiff, TIFFANY A. HENYARD, in her capacity as Supervisor of Thornton Township, respectfully prays that this Honorable Court enter a judgment granting and issuing mandamus, directing and commanding Defendant, CHRISTOPHER D. GONZALEZ, to:

- a. attend any and all regular or special meeting, including any emergency meeting of the Township Board of Thornton Township that may be called or scheduled according to law for the purpose of participating in the conduct of Thornton Township business;
- b. fully and faithfully discharge his legal duties and obligations as vested upon him by law and by virtue of his election to the office of Trustee of Thornton Township; and
- c. for such and further relief to the residents of Thornton Township as this Honorable Court may deem proper and just.

**COUNT II – MANDAMUS ACTION**  
**vs. Defendant Carmen R. Carlisle**

45. Plaintiff, TIFFANY A. HENYARD, [“HENYARD”], in her capacity as the Supervisor of Thornton Township, restates and realleges paragraphs 1-18 as if fully set forth herein.

46. At all relevant times, Defendant, CARMEN R. CARLISLE, was, and still is, a duly appointed Trustee and member of the Township Board for Thornton Township, Cook County, State of Illinois.

47. By virtue of her appointment and membership in the Township Board for Thornton Township, Defendant, CARMEN R. CARLISLE, has the legal duties

and obligations as prescribed and vested by the provisions of the Illinois Township Code, and to fully and faithfully discharge such duties and obligations according to law.

48. A regular meeting of the Township Board for Thornton Township was scheduled to be held on Tuesday, October 8, 2024, at 6pm.

49. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the regular meeting scheduled for Tuesday, October 8, 2024.

50. A regular meeting of the Township Board for Thornton Township was scheduled to be held on Thursday, October 22, 2024, at 6pm.

51. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the regular meeting scheduled for Thursday, October 22, 2024.

52. A special meeting of the Township Board for Thornton Township was scheduled to be held on Wednesday, October 30, 2024, at 6pm.

53. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Thursday, October 30, 2024.

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56. A special meeting of the Township Board for Thornton Township was scheduled to be held on Monday, November 25, 2024, at 6pm.

57. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Monday, November 25, 2024.

58. A special meeting of the Township Board for Thornton Township was scheduled to be held on Thursday, December 5, 2024, at 6pm.

59. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Thursday, December 5, 2024.

60. A special meeting of the Township Board for Thornton Township was scheduled to be held on Tuesday, December 17, 2024, at 6pm.

61. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Tuesday, December 17, 2024.

62. A special meeting of the Township Board for Thornton Township was scheduled to be held on Monday, December 30, 2024, at 6pm.

63. Defendant, CARMEN R. CARLISLE, deliberately, intentionally, and purposefully failed and refused to attend the special meeting scheduled for Monday, December 30, 2024.

64. CARMEN R. CARLISLE's deliberate, intentional, and purposeful failure and refusal to attend all the above-mentioned meetings caused a lack of quorum, thereby preventing any meeting to be held and for any business of the Township to be conducted.

65. Defendant, CARMEN R. CARLISLE, has made several public comments and gave several interviews to the media acknowledging that her failure and refusal to attend the scheduled meetings were deliberate, intentional, and purposeful. *See [Here](#).*

66. Defendant, CARMEN R. CARLISLE, has publicly declared that she would not be attending any more meetings of the Township Board for Thornton Township. *See [Here](#)*

67. Thus, Defendant, CARMEN R. CARLISLE, has failed and refused, and will continue to fail and refuse, to fully and faithfully discharge her legal duties and obligations as vested upon her by law and by virtue of her election to the office of Trustee of the Thornton Township.

68. CARMEN R. CARLISLE's failure and refusal, and continued failure and refusal, to fully and faithfully discharge his legal duties and obligations as vested upon her by law and by virtue of her election to the office of Trustee of the Thornton Township has caused a severe disruption of township services, a severe

disruption of the day-to-day functions, management, and operations of Thornton Township, and, in fact, a shut-down of Thornton Township. See [Here](#).

69. As a result of CARMEN R. CARLISLE's failure and refusal, and continued failure and refusal, to fully and faithfully discharge her legal duties and obligations as vested upon her by law and by virtue of her election to the office of Trustee of the Thornton Township, the residents of Thornton Township and the beneficiaries of the services provided by Thornton Township have suffered and are continuing to suffer hardships and inconveniences, including residents with serious medical conditions who depend on the transportation services offered by Thornton Township. See [Here](#)

70. As a result of CARMEN R. CARLISLE's failure and refusal, and continued failure and refusal, to fully and faithfully discharge her legal duties and obligations as vested upon her by law and by virtue of her election to the office of Trustee of the Thornton Township, all the insurance policies of several properties, including buildings and vehicles, of Thornton Township have lapsed, resulting in a total shut down of buildings, and cessation of transport services provided by Thornton Township.

**WHEREFORE**, Plaintiff, TIFFANY A. HENYARD, in her capacity as Supervisor of Thornton Township, respectfully prays that this Honorable Court enter a judgment granting and issuing mandamus, directing and commanding Defendant, CARMEN R. CARLISLE, to:

- a. attend any and all regular or special meeting, including any emergency meeting of the Township Board of Thornton Township that may be called or scheduled according to law for the purpose of participating in the conduct of Thornton Township business;
- b. fully and faithfully discharge her legal duties and obligations as vested upon her by law and by virtue of her appointment to the office of Trustee of Thornton Township; and
- c. for such and further relief to the residents of Thornton Township as this Honorable Court may deem proper and just.

Respectfully Submitted,

**TIFFANY A. HENYARD**

By: /s/ *McStephen O. A. Solomon*  
Her Attorney

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VERIFICATION BY CERTIFICATION

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.

/s/ *Tiffany A. Henyard*  
Tiffany A. Henyard