

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
COUNTY OF DEWITT

MARYANNE SHANHOLTZ, RILEY MCGHEE,	)	
SHERRY WILSON, and BRANDI ALSUP,	)	
	)	
Plaintiffs,	)	
	)	2026LA8
v.	)	
	)	
KARI HARRIS, DEWITT COUNTY CLERK and	)	JURY DEMAND
RECORDER, and COUNTY OF DEWITT,	)	
	)	
Defendants.	)	

COMPLAINT AT LAW

NOW COME the Plaintiffs, MARYANNE SHANHOLTZ, RILEY MCGHEE, SHERRY WILSON and BRANDI ALSUP (hereinafter referred to collectively as “Plaintiffs”), by and through their attorneys, Costigan & Wollrab, P.C., and for their Complaint at Law against the Defendants, KARI L. HARRIS, DEWITT COUNTY CLERK and RECORDER (“HARRIS”) and COUNTY OF DEWITT (“DEWITT”) hereby state as follows:

GENERAL ALLEGATIONS

1. Plaintiff, MARYANNE SHANHOLTZ, (“SHANHOLTZ”) is a resident of Dewitt County, Illinois; and during all periods relevant to the matters set forth in this Complaint, she was an employee of DEWITT assigned to work for HARRIS.
2. Plaintiff, RILEY MCGHEE, (“MCGHEE”) is a resident of Dewitt County, Illinois; and during all periods relevant to the matters set forth in this Complaint, she was an employee of DEWITT assigned to work for HARRIS.
3. Plaintiff, SHERRY WILSON, (“WILSON”) is a resident of Dewitt County, Illinois; and during all periods relevant to the matters set forth in this Complaint, she was an

employee of DEWITT assigned to work for HARRIS.

4. Plaintiff, BRANDI ALSUP, (“ALSUP”) is a resident of Dewitt County, Illinois; and during all periods relevant to the matters set forth in this Complaint, she was an employee of DEWITT assigned to work for HARRIS.

5. During all periods relevant to the matters set forth in this Complaint, HARRIS was the elected Clerk and Recorder of DEWITT.

6. During all periods relevant to the matters set forth in this Complaint, Plaintiffs were employees of DEWITT and were entitled to the protections afforded to employees of DEWITT in the personnel policies, practices and procedures of DEWITT and the laws applicable to employers and elected officials in the State of Illinois.

7. That during all times relevant to the matters set forth in this Complaint, SHANHOLTZ was meeting the legitimate business expectations of HARRIS and DEWITT.

8. That during all times relevant to the matters set forth in this Complaint, MCGHEE was meeting the legitimate business expectations of HARRIS and DEWITT.

9. That during all times relevant to the matters set forth in this Complaint, WILSON was meeting the legitimate business expectations of HARRIS and DEWITT.

10. That during all times relevant to the matters set forth in this Complaint, ALSUP was employed as the Chief Deputy Clerk and was meeting the legitimate business expectations of HARRIS and DEWITT.

11. That on June 5, 2025, HARRIS provided Plaintiffs with a copy of new personnel and confidentiality policies unilaterally implemented by HARRIS.

12. That HARRIS advised Plaintiffs on June 5, 2025, that Plaintiffs were required to review the new personnel and confidentiality policies unilaterally implemented by HARRIS; and

Plaintiffs were required to sign acknowledgments verifying their receipt of the same prior to the implementation of the new policies on June 9, 2025.

13. HARRIS failed to adhere to proper protocols for the implementation of personnel policies applicable to employees of HARRIS and DEWITT; and many policies unilaterally implemented by HARRIS applicable to Plaintiffs were contrary to the personnel policies of DEWITT and contrary to laws applicable to employers in Illinois.

14. MCGHEE, WILSON and ALSUP advised HARRIS that they were signing the acknowledgment of the new personnel and confidentiality policies unilaterally implemented by HARRIS “under duress”.

15. On June 12, 2025, HARRIS threatened MCGHEE, WILSON and ALSUP with disciplinary action for their refusal to sign an acknowledgement of their receipt of the new personnel and confidentiality policies unilaterally implemented by HARRIS.

16. On or about July 17, 2025, ALSUP announced her candidacy to run against HARRIS as a candidate for the elected office of DeWitt County Clerk and Recorder in the election to be held in March of 2026.

17. MCGHEE and WILSON exercised their respective fundamental rights to support ALSUP as a candidate for election to the office of the DeWitt County Clerk and Recorder when MCGHEE and WILSON were engaged in personal endeavors outside of their assigned work hours after ALSUP announced that she was a candidate for the elected office of the DeWitt County Clerk and Recorder in the upcoming election to be held in March of 2026.

18. ALSUP exercised her fundamental right to participate in running for the elected office of the DeWitt County Clerk and Recorder when ALSUP was engaged in personal endeavors outside of her assigned work hours.

19. SHANHOLTZ exercised her fundamental right to participate in activities in support of ALSUP as a candidate for election to the office of the DeWitt County Clerk and Recorder when SHANHOLTZ was engaged in personal endeavors outside of her assigned work hours during periods when SHANHOLTZ was employed by DEWITT.

20. During periods after July 17, 2025 and continuing to September 6, 2025 and after, HARRIS advised Plaintiffs that it was the desire of HARRIS that Plaintiffs participate in political events occurring outside of the normal assigned work hours of Plaintiffs to show support for HARRIS and HARRIS' reelection campaign for the position of DeWitt County Clerk and Recorder in the election to be held in March of 2026.

21. Initially, HARRIS had advised Plaintiffs that each of them would be required to march in parades and attend scheduled political events to demonstrate support for HARRIS; notwithstanding that each of the Plaintiffs planned to refrain from marching in events or participating in political events in support of HARRIS during their own personal time and outside of the normal hours of employment of Plaintiffs.

22. HARRIS made it clear to Plaintiffs that their support of her campaign for reelection in March of 2026 was expected since Plaintiffs were employed by DEWITT and assigned to work for HARRIS during periods relevant to the matters set forth in this Complaint.

23. HARRIS humiliated, harassed and intimidated Plaintiffs in the Plaintiffs' workplace at DEWITT due to Plaintiffs' political beliefs and political affiliations even though Plaintiffs were meeting the legitimate business expectations of HARRIS and DEWITT during all periods when Plaintiffs were performing work for HARRIS and DEWITT.

24. Even after Plaintiff, SHANHOLTZ was no longer assigned to work for HARRIS, and remained employed by DEWITT, HARRIS continued to harass, humiliate and intimidate

SHANHOLTZ.

25. HARRIS also continued to harass, humiliate and intimidate Plaintiffs, MCGHEE, WILSON, and ALSUP due to their friendship and affiliation with SHANHOLTZ outside of hours that MCGHEE, WILSON, and ALSUP were assigned to work for HARRIS.

26. On September 6, 2025, Plaintiffs attended the Kenny Fall Festival which was held on a Saturday and outside of Plaintiffs' normal assigned work hours.

27. That during the Kenny Fall Festival, Plaintiffs exercised their right to participate in activities showing their support for ALSUP as a candidate for the elected office of DeWitt County Clerk and Recorder in the March 2026 election, including wearing T-shirts in support of ALSUP and engaging in activities during the Kenny Fall Festival in support of ALSUP's candidacy.

28. That on September 8, 2025, ALSUP, MCGHEE, and WILSON reported for their normal work shift for HARRIS and DEWITT.

29. Shortly after the start of the workday on September 8, 2025, HARRIS demanded a meeting with ALSUP.

30. During the meeting between HARRIS and ALSUP, HARRIS demanded ALSUP's resignation.

31. ALSUP was not provided with any legitimate business reason for the demand by HARRIS for ALSUP to resign her position with HARRIS and DEWITT.

32. The demand by HARRIS for ALSUP to resign her position with HARRIS and DEWITT was in retaliation for ALSUP's exercise of her rights afforded to her under state and federal laws prohibiting discrimination, harassment and retaliation for the exercise of personal political beliefs and affiliations.

33. That on and since September 8, 2025, HARRIS has harassed, intimidated and retaliated against MCGHEE and WILSON for their support of ALSUP, including enforcing personnel policies and procedures against MCGHEE and WILSON but not enforcing the same personnel policies and procedures unilaterally implemented by HARRIS against employees hired by HARRIS who did not hold the same political beliefs and affiliations of MCGHEE and WILSON.

34. That during the tenure of HARRIS as the DeWitt County Clerk and Recorder, HARRIS has misused funds and misallocated funds, including but not limited to misusing funds to pay bonuses to Plaintiffs during periods when Plaintiffs were performing their regular assigned job duties for HARRIS and while Plaintiffs were being paid their usual salary by DEWITT in violation of municipal finance laws and regulations of DEWITT applicable to HARRIS.

35. That during the tenure of HARRIS as the DeWitt County Clerk and Recorder and while HARRIS was campaigning for reelection as DeWitt County Clerk and Recorder for the election to be held in March of 2026, HARRIS used DEWITT resources to garner support for her candidacy during periods when HARRIS was performing her official job duties as the DeWitt County Clerk and Recorder in violation of municipal finance laws and regulations of DEWITT applicable to HARRIS.

36. That during the tenure of HARRIS as the DeWitt County Clerk and Recorder and while HARRIS was campaigning for reelection as DeWitt County Clerk and Recorder for the election to be held in March of 2026, HARRIS was using social media of the DeWitt County Clerk and Recorder's office, including but not limited to specifically on July 7, 2025 to garner support for her reelection in violation of applicable laws and regulations of DEWITT applicable to

HARRIS.

37. That Plaintiffs made complaints to DEWITT administrative personnel regarding the foregoing acts of HARRIS, which Plaintiffs had a reasonable basis to believe were in violation of state, federal and local laws and ordinances on multiple occasions, including beginning in approximately May of 2025 and continuing through March of 2026.

38. As of the filing of this Complaint at Law, DEWITT has failed to take any action to address the actions of HARRIS which Plaintiffs have a reasonable basis to believe are in violation of state, federal and local laws and ordinances applicable to HARRIS.

39. That because of Plaintiffs' complaints to DEWITT regarding HARRIS and the foregoing actions of HARRIS, Plaintiffs have faced harassment, discrimination and retaliation in the workplace by HARRIS; and the administration of DEWITT has been complicit in allowing HARRIS to continue to commit harassment, discrimination and retaliation against Plaintiffs during all periods alleged in this Complaint.

40. DEWITT administrative personnel have failed to take any action to stop or prohibit the commission of harassment, discrimination and retaliation by HARRIS and other employees of DEWITT against Plaintiffs up to the date of the filing of this Complaint by Plaintiffs.

41. That as the Clerk and Recorder of DEWITT, HARRIS had an obligation to properly maintain the personnel files of employees including Plaintiffs.

42. HARRIS failed to adhere to privacy laws applicable to employers in Illinois by failing to properly secure and keep confidential the personnel records of Plaintiffs.

43. HARRIS has allowed personal and private information of Plaintiffs, including but not limited to social security numbers, protected health care information and other personal and

confidential information of Plaintiffs to be stored in unsecured filing cabinets accessible by other personnel of HARRIS' office and DEWITT in violation of the laws of the State of Illinois ensuring employees the right to privacy in the workplace.

44. HARRIS has threatened and retaliated against Plaintiffs for actions that Plaintiffs have engaged in outside of their normal work hours in violation of the laws of the State of Illinois ensuring employees the right to privacy during periods when employees are not working for their employer.

45. That as a result of the foregoing retaliatory, discriminatory, threatening and harassing actions of HARRIS and the failure of DEWITT to address the complaints of Plaintiffs, the Plaintiffs have sustained damages to their reputation, have incurred emotional distress, and have sustained damages for the humiliation they have faced in the workplace and outside of the workplace due to the actions of HARRIS and the inaction of administrative personnel of DEWITT.

COUNT I

ILLINOIS WHISTLEBLOWER ACT RETALIATION **(SHANHOLTZ'S ACTION AGAINST HARRIS)**

1.-45. Plaintiff, MARYANN SHANHOLTZ, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five⁴ (45) of Count I of this Complaint at Law as if fully set forth below.

46. That on February 17, 2026, SHANHOLTZ attended a meeting of the Finance Committee of the Dewitt County Board.

47. That at the Finance Committee meeting, SHANHOLTZ questioned the members of the Finance Committee about the status of the internal complaint she had previously filed with DEWITT regarding and relating to the allegations of SHANHOLTZ asserted against HARRIS

for the discriminatory and harassing actions of HARRIS.

48. SHANHOLTZ was advised by the Finance Committee that the internal complaint that she had filed with DEWITT was investigated and the matter was now closed. SHANHOLTZ was also advised that no disciplinary action would be taken against HARRIS as a consequence of the internal complaint made by SHANHOLTZ to DEWITT.

49. SHANHOLTZ also inquired of the Finance Committee why her previous Freedom of Information Act (“FOIA”) request was denied because “...there was no written closure of the investigation.”

50. Upon further inquiry, Finance Committee member, Melonie Tilley, stated that the matter was now closed.

51. SHANHOLTZ submitted multiple FOIA requests to DEWITT for copies of information related to the investigation by DEWITT of her internal complaint; and DEWITT has denied all of the FOIA requests of SHANHOLTZ and has failed to provide SHANHOLTZ with any information she requested related to the internal complaint she filed with DEWITT.

52. SHANHOLTZ attended a meeting of the Finance Committee on March 16, 2026.

53. During the meeting, SHANHOLTZ advised the Finance Committee that during the time that she was working as the payroll clerk for HARRIS, she was never provided with any training on how to perform the payroll clerk duties of the office of the DeWitt County Clerk by HARRIS.

54. SHANHOLTZ explained to the Finance Committee that during her tenure as the payroll clerk for the DeWitt County Clerk’s office, SHANHOLTZ eventually taught herself how to perform the job duties assigned to the payroll clerk; and once HARRIS saw that SHANHOLTZ had mastered the job duties of payroll clerk, HARRIS stripped those payroll job

duties away from SHANHOLTZ.

55. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).)

56. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

57. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

58. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

59. That at all times relevant to the matters set forth herein, SHANHOLTZ was an employee under the Act.

60. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

61. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

62. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

63. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

64. The reports by SHANHOLTZ of the actions and inactions of HARRIS and DEWITT led to SHANHOLTZ leaving her employment with HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward SHANHOLTZ.

65. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

66. As a result of the foregoing acts asserted in this Count I, SHANHOLTZ has sustained damages, including, but not limited to, the following:

- a. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by SHANHOLTZ from HARRIS and DEWITT.
- e. All other compensatory damages available to SHANHOLTZ under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, MARYANNE SHANHOLTZ, prays that this Honorable Court enter judgment in favor of Plaintiff and against HARRIS on Count I in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT II

ILLINOIS WHISTLEBLOWER ACT RETALIATION **(SHANHOLTZ'S ACTION AGAINST DEWITT)**

1.-45. Plaintiff, MARYANN SHANHOLTZ, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five (45) of Count II of this Complaint at Law as if fully set forth below.

46. That on February 17, 2026, SHANHOLTZ attended a meeting of the Finance

Committee of the Dewitt County Board.

47. That at the Finance Committee meeting, SHANHOLTZ questioned the members of the Finance Committee about the status of the internal complaint she had previously filed with DEWITT regarding and relating to the allegations of SHANHOLTZ asserted against HARRIS for the discriminatory and harassing actions of HARRIS.

48. SHANHOLTZ was advised by the Finance Committee that the internal complaint that she had filed with DEWITT was investigated and the matter was now closed. SHANHOLTZ was also advised that no disciplinary action would be taken against HARRIS as a consequence of the internal complaint made by SHANHOLTZ to DEWITT.

49. SHANHOLTZ also inquired of the Finance Committee why her previous Freedom of Information Act (“FOIA”) request was denied because “...there was no written closure of the investigation.”

50. Upon further inquiry, Finance Committee member, Melonie Tilley, stated that the matter was now closed.

51. SHANHOLTZ submitted multiple FOIA requests to DEWITT for copies of information related to the investigation by DEWITT of her internal complaint; and DEWITT has denied all of the FOIA requests of SHANHOLTZ and has failed to provide SHANHOLTZ with any information she requested related to the internal complaint she filed with DEWITT.

52. SHANHOLTZ attended a meeting of the Finance Committee on March 16, 2026.

53. During the meeting, SHANHOLTZ advised the Finance Committee that during the time that she was working as the payroll clerk for HARRIS, she was never provided with any training on how to perform the payroll clerk duties of the office of the DeWitt County Clerk by HARRIS.

54. SHANHOLTZ explained to the Finance Committee that during her tenure as the payroll clerk for the DeWitt County Clerk's office, SHANHOLTZ eventually taught herself how to perform the job duties assigned to the payroll clerk; and once HARRIS saw that SHANHOLTZ had mastered the job duties of payroll clerk, HARRIS stripped those payroll job duties away from SHANHOLTZ.

55. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as "the Act".)

56. Section 5 of the Illinois Whistleblower Act defines "Employer" as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

57. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

58. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

59. That at all times relevant to the matters set forth herein, SHANHOLTZ was an employee under the Act.

60. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

61. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

62. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

63. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

64. The reports by SHANHOLTZ of the actions and inactions of HARRIS and DEWITT led to SHANHOLTZ leaving her employment with HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward SHANHOLTZ.

65. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

66. As a result of the foregoing acts asserted in this Count II, SHANHOLTZ has sustained damages, including, but not limited to, the following:

- a. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by SHANHOLTZ from HARRIS and DEWITT.
- e. All other compensatory damages available to SHANHOLTZ under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, MARYANNE SHANHOLTZ, prays that this Honorable Court enter judgment in favor of Plaintiff and against DEWITT on Count II in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT III
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(MCGHEE'S ACTION AGAINST HARRIS)

1.-45. Plaintiff, RILEY MCGHEE, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five (45) of Count III of this Complaint at Law against Defendant, HARRIS, as if fully set forth below.

46. That on or about March 16, 2026, Plaintiff, MCGHEE, attended a Finance Committee meeting of the DEWITT County Board ('Finance Committee').

47. During the course of the Finance Committee meeting, MCGHEE addressed the Finance Committee about certain matters occurring in the office of HARRIS, and in particular with regard to the training or lack of training that MCGHEE had received in performing certain job duties she had been hired to perform, in particular the job duties related to her position as the payroll clerk.

48. That in response to certain inquiries from the Finance Committee, MCGHEE provided information about the lack of training that she had received; and further explained that despite the fact that she had been hired to perform payroll functions as part of her job duties, HARRIS had not allowed MCGHEE to perform payroll functions and had failed to allow MCGHEE to perform certain payroll functions.

49. In addition, when MCGHEE was in attendance at the Finance Committee meeting, there was discussion regarding the fact that HARRIS had unilaterally decided to close the office of the DeWitt County Clerk and Recorder on a date in January of 2026 due to weather, when the other DEWITT County offices remained open for business. HARRIS had informed MCGHEE and other employees of the DeWitt County Clerk and Recorder's office that they

would be paid their normal pay for that date and would not have to use paid time off for the day as HARRIS had made the decision to close the office.

50. That on March 17, 2026 the election for local public offices was held in DeWitt County, including the election for the office of DeWitt County Clerk and Recorder.

51. That on March 17, 2026, MCGHEE was performing her usual job duties for HARRIS when MCGHEE learned that there was an irregularity that occurred when a constituent of DeWitt County came into the DeWitt County Clerk's office to cast her in person ballot for the March 17, 2026 election.

52. That another employee of the office of the DeWitt County Clerk, namely Dawn Wisely assisted the constituent with her in person ballot.

53. That during the course of Dawn Wisely assisting the constituent it was revealed that the ballot had been spoiled.

54. That Dawn Wisely improperly shredded the spoiled ballot; and destroyed the electronic copy of the ballot.

55. That Dawn Wisely's handling of the spoiled ballot was contrary to the election laws and administrative laws applicable to elections held in DeWitt County and the State of Illinois.

56. That on March 20, 2026, Dawn Wisely admitted to MCGHEE that she had mishandled the spoiled ballot as she had shredded the paper ballot.

57. That on March 20, 2026, following MCGHEE's discussion with Dawn Wisely, MCGHEE went to Dan Markwell, public official with the DeWitt County State's Attorney's office, to advise Dan Markwell of Dawn Wisely's mishandling of the spoiled ballot.

58. Dan Markwell advised MCGHEE that MCGHEE should advise Dawn Wisley that she needed to go to HARRIS herself and advise HARRIS of her failure to properly handle the spoiled ballot.

59. That on March 20, 2026, following MCGHEE's conversation with Dan Markwell, MCGHEE went to Dawn Wisely and advised her that on the advice of Dan Markwell, Dawn Wisely needed to tell HARRIS that she had improperly handled the spoiled ballot. MCGHEE also advised Dawn Wisely that MCGHEE and all employees of the DeWitt County Clerk's office had an obligation to uphold the integrity of the office.

60. That on March 23, 2026, HARRIS made Dawn Wisely Chief Deputy of the DeWitt County Clerk's office.

61. That Dawn Wisely did not tell HARRIS about her mishandling of the spoiled ballot.

62. That on March 23, 2026, since Dawn Wisely was not forthcoming in telling HARRIS about her mishandling of the spoiled ballot, MCGHEE told HARRIS about Dawn Wisely's mishandling of the spoiled ballot.

63. That despite being advised that Dawn Wisely had mishandled the spoiled ballot, HARRIS did not discipline Dawn Wisely; and Dawn Wisely maintained her position as Chief Deputy of the DeWitt County Clerk's office despite her mishandling of the spoiled ballot and despite her failure to disclose her mishandling of the spoiled ballot to HARRIS.

64. That on March 23, 2026, HARRIS received in the mail delivered to the DeWitt County Clerk's office a Charge of Discrimination filed with the Illinois Department of Human Rights filed by Plaintiff, SHANHOLTZ against HARRIS and DEWITT.

65. That MCGHEE was aware of the receipt by HARRIS on March 23, 2026 of the Charge of Discrimination.

66. That on March 31, 2026, HARRIS terminated the employment of MCGHEE without justification and in retaliation for MCGHEE's lawful acts, including but not limited to exercising her protected political beliefs and preferences; and in retaliation for MCGHEE's reports of suspected violations of the law by HARRIS and Dawn Wisely, who had been named by HARRIS as Chief Deputy Clerk of the DeWitt County Clerk's office, to administrative personnel and public officials of DEWITT.

67. That on April 1, 2026, HARRIS posted the position that MCGHEE had held until MCGHEE's employment with DEWITT was involuntarily terminated by HARRIS on March 31, 2026.

68. That in violation of the municipal regulations of DEWITT applicable to HARRIS, MCGHEE's former position was posted by HARRIS on April 1, 2026 without the authorization of the Finance Committee.

69. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as "the Act".)

70. Section 5 of the Illinois Whistleblower Act defines "Employer" as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

71. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

72. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

73. That at all times relevant to the matters set forth herein, MCGHEE was an employee under the Act.

74. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

75. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice

(i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

76. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

77. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

78. The reports by MCGHEE of the actions and inactions of HARRIS and DEWITT led to the termination of MCGHEE's employment by HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward MCGHEE.

79. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

80. As a result of the foregoing acts asserted in this Count III, MCGHEE has sustained damages, including, but not limited to, the following:

- a. Compensation for back pay and other employer-sponsored benefits owed to Plaintiff, MCGHEE by HARRIS and DEWITT.
- b. Compensation for front pay and other employer-sponsored benefits owed to Plaintiff, MCGHEE, because of the foregoing actions and inactions of

HARRIS and DEWITT.

- c. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by MCGHEE from HARRIS and DEWITT.
- d. All other compensatory damages available to MCGHEE under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, RILEY MCGHEE, prays that this Honorable Court enter judgment in favor of Plaintiff and against HARRIS on this Count III in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT IV
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(MCGHEE'S ACTION AGAINST DEWITT)

1.-45. Plaintiff, RILEY MCGHEE, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five (45) of Count IV of this Complaint at Law against Defendant, DEWITT, as if fully set forth below.

46. That on or about March 16, 2026, Plaintiff, MCGHEE, attended a Finance Committee meeting of the DEWITT County Board ('Finance Committee').

47. During the course of the Finance Committee meeting, MCGHEE addressed the Finance Committee about certain matters occurring in the office of HARRIS, and in particular with regard to the training or lack of training that MCGHEE had received in performing certain job duties she had been hired to perform, in particular the job duties related to her position as the payroll clerk.

48. That in response to certain inquiries from the Finance Committee, MCGHEE provided information about the lack of training that she had received; and further explained that despite the fact that she had been hired to perform payroll functions as part of her job duties, HARRIS had not allowed MCGHEE to perform payroll functions and had failed to allow MCGHEE to perform certain payroll functions.

49. In addition, when MCGHEE was in attendance at the Finance Committee meeting, there was discussion regarding the fact that HARRIS had unilaterally decided to close the office of the DeWitt County Clerk and Recorder on a date in January of 2026 due to weather, when the other DEWITT County offices remained open for business. HARRIS had informed MCGHEE and other employees of the DeWitt County Clerk and Recorder's office that they would be paid their normal pay for that date and would not have to use paid time off for the day as HARRIS had made the decision to close the office.

50. That on March 17, 2026 the election for local public offices was held in DeWitt County, including the election for the office of DeWitt County Clerk and Recorder.

51. That on March 17, 2026, MCGHEE was performing her usual job duties for HARRIS when MCGHEE learned that there was an irregularity that occurred when a constituent of DeWitt County came into the DeWitt County Clerk's office to cast her in person ballot for the March 17, 2026 election.

52. That another employee of the office of the DeWitt County Clerk, namely Dawn Wisely assisted the constituent with her in person ballot.

53. That during the course of Dawn Wisely assisting the constituent it was revealed that the ballot had been spoiled.

54. That Dawn Wisely improperly shredded the spoiled ballot; and destroyed the electronic copy of the ballot.

55. That Dawn Wisely's handling of the spoiled ballot was contrary to the election laws and administrative laws applicable to elections held in DeWitt County and the State of Illinois.

56. That on March 20, 2026, Dawn Wisely admitted to MCGHEE that she had mishandled the spoiled ballot as she had shredded the paper ballot.

57. That on March 20, 2026, following MCGHEE's discussion with Dawn Wisely, MCGHEE went to Dan Markwell, public official with the DeWitt County State's Attorney's office, to advise Dan Markwell of Dawn Wisely's mishandling of the spoiled ballot.

58. Dan Markwell advised MCGHEE that MCGHEE should advise Dawn Wisely that she needed to go to HARRIS herself and advise HARRIS of her failure to properly handle the spoiled ballot.

59. That on March 20, 2026, following MCGHEE's conversation with Dan Markwell, MCGHEE went to Dawn Wisely and advised her that on the advice of Dan Markwell, Dawn Wisely needed to tell HARRIS that she had improperly handled the spoiled ballot. MCGHEE also advised Dawn Wisely that MCGHEE and all employees of the DeWitt County Clerk's office had an obligation to uphold the integrity of the office.

60. That on March 23, 2026, HARRIS made Dawn Wisely Chief Deputy of the DeWitt County Clerk's office.

61. That Dawn Wisely did not tell HARRIS about her mishandling of the spoiled ballot.

62. That on March 23, 2026, since Dawn Wisely was not forthcoming in telling HARRIS about her mishandling of the spoiled ballot, MCGHEE told HARRIS about Dawn Wisely's mishandling of the spoiled ballot.

63. That despite being advised that Dawn Wisely had mishandled the spoiled ballot, HARRIS did not discipline Dawn Wisely; and Dawn Wisely maintained her position as Chief Deputy of the DeWitt County Clerk's office despite her mishandling of the spoiled ballot and despite her failure to disclose her mishandling of the spoiled ballot to HARRIS.

64. That on March 23, 2026, HARRIS received in the mail delivered to the DeWitt County Clerk's office a Charge of Discrimination filed with the Illinois Department of Human Rights filed by Plaintiff, SHANHOLTZ against HARRIS and DEWITT.

65. That MCGHEE was aware of the receipt by HARRIS on March 23, 2026 of the Charge of Discrimination.

66. That on March 31, 2026, HARRIS terminated the employment of MCGHEE without justification and in retaliation for MCGHEE's lawful acts, including but not limited to exercising her protected political beliefs and preferences; and in retaliation for MCGHEE's reports of suspected violations of the law by HARRIS and Dawn Wisely, who had been named by HARRIS as Chief Deputy Clerk of the DeWitt County Clerk's office, to administrative personnel and public officials of DEWITT.

67. That on April 1, 2026, HARRIS posted the position that MCGHEE had held until MCGHEE's employment with DEWITT was involuntarily terminated by HARRIS on March 31, 2026.

68. That in violation of the municipal regulations of DEWITT applicable to HARRIS, MCGHEE's former position was posted by HARRIS on April 1, 2026 without the authorization

of the Finance Committee.

69. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).)

70. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

71. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

72. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

73. That at all times relevant to the matters set forth herein, MCGHEE was an employee under the Act.

74. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

75. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

76. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

77. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

78. The reports by MCGHEE of the actions and inactions of HARRIS and DEWITT led to the termination of MCGHEE's employment by HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward MCGHEE.

79. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

80. As a result of the foregoing acts asserted in this Count IV, MCGHEE has sustained damages, including, but not limited to, the following:

- a. Compensation for back pay and other employer-sponsored benefits owed to Plaintiff, MCGHEE, by HARRIS and DEWITT.
- b. Compensation for front pay and other employer-sponsored benefits owed to Plaintiff, MCGHEE, because of the foregoing actions and inactions of HARRIS and DEWITT.
- c. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by MCGHEE from HARRIS and DEWITT.
- d. All other compensatory damages available to MCGHEE under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, RILEY MCGHEE, prays that this Honorable Court enter judgment in favor of Plaintiff and against DEWITT on Count IV in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT V
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(WILSON'S ACTION AGAINST HARRIS)

1.-45. Plaintiff, SHERRY WILSON, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five⁴ (45) of Count V of this Complaint at Law against Defendant, HARRIS, as if fully set forth below.

46. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).

47. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

48. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

49. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

50. That at all times relevant to the matters set forth herein, WILSON was an employee under the Act.

51. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

52. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

53. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

54. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

55. The reports by WILSON of the actions and inactions of HARRIS and DEWITT led to the retaliatory actions of HARRIS and DEWITT toward WILSON.

56. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

57. As a result of the foregoing acts asserted in this Count V, WILSON has sustained damages, including, but not limited to, the following:

- a. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by WILSON from HARRIS and DEWITT.
- d. All other compensatory damages available to WILSON under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, SHERRY WILSON, prays that this Honorable Court enter judgment in favor of Plaintiff and against HARRIS on Count VI in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT VI
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(WILSON'S ACTION AGAINST DEWITT)

1.-45. Plaintiff, SHERRY WILSON, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five⁴ (45) of Count VI of this Complaint at Law against Defendant, DEWITT, as if fully set forth below.

46. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).

47. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

48. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

49. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

50. That at all times relevant to the matters set forth herein, WILSON was an employee under the Act.

51. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

52. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

53. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

54. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

55. The reports by WILSON of the actions and inactions of HARRIS and DEWITT led to the retaliatory actions of HARRIS and DEWITT toward WILSON.

56. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

57. As a result of the foregoing acts asserted in this Count V, WILSON has sustained damages, including, but not limited to, the following:

- a. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by WILSON from HARRIS and DEWITT.
- d. All other compensatory damages available to WILSON under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, SHERRY WILSON, prays that this Honorable Court enter judgment in favor of Plaintiff and against DEWITT on Count VI in an amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT VII
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(ALSUP'S ACTION AGAINST HARRIS)

1.-45. Plaintiff, BRANDI ALSUP, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five4 (45) of Count VII of this Complaint at Law against Defendant, HARRIS, as if fully set forth below.

46. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).

47. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

48. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

49. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

50. That at all times relevant to the matters set forth herein, ALSUP was an employee under the Act.

51. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

52. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

53. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

54. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

55. The reports by ALSUP of the actions and inactions of HARRIS and DEWITT led to the termination of ALSUP's employment by HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward ALSUP.

56. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

57. As a result of the foregoing acts asserted in this Count V, ALSUP has sustained damages, including, but not limited to, the following:

- a. Compensation for back pay and other employer-sponsored benefits owed to Plaintiff, ALSUP, by HARRIS and DEWITT.
- b. Compensation for front pay and other employer-sponsored benefits owed to Plaintiff, ALSUP, because of the foregoing actions and inactions of HARRIS and DEWITT.
- c. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by ALSUP from HARRIS and DEWITT.
- d. All other compensatory damages available to ALSUP under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, BRANDI ALSUP, prays that this Honorable Court enter judgment in favor of Plaintiff and against HARRIS on Count VII in an

amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

COUNT VIII
ILLINOIS WHISTLEBLOWER ACT RETALIATION
(ALSUP'S ACTION AGAINST HARRIS)

1.-45. Plaintiff, BRANDI ALSUP, re-asserts and re-alleges Paragraphs One (1) through Forty-Five (45) of the General Allegations set forth herein as Paragraphs One (1) through Forty-Five4 (45) of Count VIII of this Complaint at Law against the Defendant, DEWITT, as if fully set forth below.

46. At all times relevant to the matters set forth in this Complaint at Law, there was in effect in the State of Illinois a certain statute known as the *Illinois Whistleblower Act*, 740 ILCS 174/1, *et seq.* (hereafter referred to herein as “the Act”).

47. Section 5 of the Illinois Whistleblower Act defines “Employer” as follows:

Section 5: "Employer" means: an individual, sole proprietorship, partnership, firm, corporation, association, and any other entity that has one or more employees in this State, including a political subdivision of the State; a unit of local government; a school district, combination of school districts, or governing body of a joint agreement of any type formed by two or more school districts; a community college district, State college or university, or any State agency whose major function is providing educational services; any authority including a department, division, bureau, board, commission, or other agency of these entities; and any person acting with its employees. 740 ILCS 174/5.

48. That at all times relevant to the matters set forth herein, HARRIS was an employer under the Act.

49. That at all times relevant to the matters set forth herein, DEWITT was an employer under the Act.

50. That at all times relevant to the matters set forth herein, ALSUP was an employee under the Act.

51. That Section 10 of the Act provides in pertinent part the following:

Sec. 10: Certain policies prohibited:

An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency if the employee has reasonable cause to believe that the information discloses a violation of a State or federal law, rule, or regulation. 740 ILCS 174/10.

52. That Section 15 of the Act provides in pertinent part the following:

Sec. 15: Retaliation for certain disclosures prohibited:

(a) An employer may not take retaliatory action against an employee who discloses or threatens to disclose to a public body conducting an investigation, or in a court, an administrative hearing, or any other proceeding initiated by a public body, information related to an activity, policy, or practice of the employer where the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(b) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

(c) An employer may not take retaliatory action against an employee for disclosing or threatening to disclose to any supervisor, principal officer, board member, or supervisor in an organization that has a contractual relationship with the employer who makes the employer aware of the disclosure, information related to an activity, policy, or practice of the employer if the employee has a good faith belief that the activity, policy, or practice (i) violates a State or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety. 740 ILCS 174/15.

53. That Section 20 of the Act provides in pertinent part the following:

Sec. 20. Retaliation for certain refusals prohibited.

An employer may not take retaliatory action against an employee for refusing to participate in an activity that the employee has a good faith belief that such participation would result in a violation of a State or federal law, rule, or regulation, including, but not limited to violations of the Freedom of Information Act.

54. That Section 20.1 and 20.2 of the Act provide in pertinent part the following:

Sec. 20.1. Other retaliation. Any other act or omission not otherwise specifically set forth in this Act, whether within or without the workplace, also constitutes retaliatory action by an employer under this Act if the act or omission would be materially adverse to a reasonable employee and is because of the employee disclosing or attempting to disclose public corruption or wrongdoing. (740 ILCS 174/20.1)

Sec. 20.2. Threatening retaliation. An employer may not threaten any employee with any act or omission if that act or omission would constitute retaliatory action against the employee under this Act. (740 ILCS 174/20.2)

55. The reports by ALSUP of the actions and inactions of HARRIS and DEWITT led to the termination of ALSUP's employment by HARRIS; and further led to the retaliatory actions of HARRIS and DEWITT toward ALSUP.

56. The actions of HARRIS and DEWITT violated the provisions of 740 ILCS 174/1, *et seq.*

57. As a result of the foregoing acts asserted in this Count VIII, ALSUP has sustained damages, including, but not limited to, the following:

- a. Compensation for back pay and other employer-sponsored benefits owed to Plaintiff, ALSUP, by HARRIS and DEWITT.
- b. Compensation for front pay and other employer-sponsored benefits owed to Plaintiff, ALSUP, because of the foregoing actions and inactions of HARRIS and DEWITT.
- c. Compensatory damages for the harassment, intimidation, retaliation and discrimination endured by ALSUP from HARRIS and DEWITT.
- d. All other compensatory damages available to ALSUP under Illinois law applicable to the matters set forth herein.

WHEREFORE, based on the foregoing, Plaintiff, BRANDI ALSUP, prays that this Honorable Court enter judgment in favor of Plaintiff and against DEWITT on Count VIII in an

amount in excess of Fifty Thousand and 00/100s Dollars (\$50,000.00) and for costs of suit and further prays for such other and further relief as this Court deems equitable and proper.

Respectfully Submitted,

Plaintiffs, MARYANNE SHANHOLTZ,
RILEY MCGHEE, SHERRY WILSON,
and BRANDI ALSUP,

/s/ Dawn L. Wall

By: _____
Dawn L. Wall, their attorney

**PLAINTIFFS DEMAND A TRIAL BY A JURY OF TWELVE PERSONS ON ALL
COUNTS OF THEIR COMPLAINT AT LAW.**

Ms. Dawn L. Wall
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RULE 222 AFFIDAVIT

The undersigned, Dawn L. Wall, attorney for Plaintiffs, MARYANNE SHANHOLTZ, RILEY WILSON, SHRRY WILSON, and BRANDI ALSUP, having been sworn on oath, does hereby state that pursuant to Illinois Supreme Court Rule 222 the total of money damages sought in this cause is in excess of \$50,000.00.

FURTHER, AFFIANT SAYETH NOT.

/s/ Dawn L. Wall

Dawn L. Wall

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