

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL
CIRCUIT OF ILLINOIS, CASS COUNTY, ILLINOIS

GWENDOLYN M. THOMAS

Petitioner,

vs.

LUKE A. THOMAS,

Respondent.

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No. 2022-DC-15

**SUPPLEMENT TO PETITION FOR MODIFICATION OF CUSTODY AND
SUPPLEMENT TO AMENDED PETITION FOR RELIEF FROM JUDGMENT**

NOW COMES the Respondent, LUKE A. THOMAS, *pro se*, and respectfully submits this Supplement to his pending Petition for Modification of Custody and Amended Petition for Relief from Judgment (735 ILCS 5/2-1401). In support of this Supplement, which specifically details the systemic child abuse, severe medical neglect, and fraudulent manipulation and inducements made to the Guardian ad Litem (GAL) and this Court, Respondent states as follows:

I. Abuse and Endangerment

1. Petitioner's severe and unchecked alcohol abuse has directly endangered the minor children and culminated in acts of physical violence and public endangerment that were actively concealed from this Court and the GAL.
2. Petitioner's alcoholism and erratic behavior are not mere allegations. In a stark display of endangerment, In October, 2025, Petitioner failed to return to Ashland to appear at the (IJT) minor child's last junior high school dance, despite having told IJT and her friends she would be there to take pictures. Instead, Petitioner operated a motor vehicle under the influence of alcohol, crossed traffic lanes, crashed her vehicle, and destroyed property

affecting the power grid for the town of Tallula, Illinois, resulting in her arrest and subsequent conviction for DUI in 2026.

3. This dangerous conduct routinely occurred within the marital home as alleged pre-judgment. Petitioner was routinely and completely incapacitated and unable to provide necessary nighttime medical monitoring for the children's Type-1 diabetes, including emergency instances where her father had to travel to Ashland because Petitioner failed to render aid to the GAT who was experiencing dangerous hypoglycemia, which sent alerts to Petitioner and her father. Petitioner remained incapacitated while the door was being frantically knocked on, finally arousing to instruct the minor child to go downstairs because she was afraid someone was breaking in.
4. On or about July 28, 2023, Petitioner arrived home highly intoxicated and unjustifiably became violent, smacking the parties' youngest minor child, LLT, in the face. This unprovoked assault terrified the children and resulted in them making 911 call.
5. Rather than accept responsibility for this domestic battery, Petitioner utilized her professional influence as an attorney and assistant state's attorney. She ensured a familiar local law enforcement officer responded to the scene and actively manipulated the narrative to shift the blame onto the minor children, specifically targeting the eldest minor son, GAT, whom she had already systematically abused and discredited.

II. Isolation and Fraud

6. Respondent learned the full details of Petitioner's following conduct post-judgment, namely that following the entry of orders restricting Respondent's contact with the children at the end of May 2023 following Petitioner's false kidnapping allegations

against Respondent, Petitioner utilized her sole control over the household to subject the children to severe gaslighting, obsessive privacy invasions, and psychological abuse.

7. During this period, Petitioner routinely isolated the children, leaving them at home without air conditioning, and weaponized their communication. In mid-to-late July, 2023, She physically seized the children's cellular phones, removing their only lifeline to Respondent and isolating them while out of state so the devices could be searched and analyzed, only returning the devices days thereafter. This conduct left the children living in a constant state of fear, stress, and helplessness.
8. When the minor child VMT attempted to resist this manipulative behavior, Petitioner utilized the same abusive tactics to silence her. In last September, 2024, Petitioner packed VMT's bags and handed her an informational packet from a local foster agency, cruelly telling the minor child that she was going to foster care just like her brother and threatened her is she told her dad.
9. Furthermore, following the July 28, 2023 incident, Petitioner kicked GAT out of the residence, thereafter committed educational fraud by misrepresenting her residency and the legality of GAT's enrollment to the Chatham School District. This deception caused severe instability for GAT, forcing him to commute from Ashland to Chatham and sit outside the school alone for excessive amounts of time, further compromising his well-being, educational development and diabetes management.

III. SEVERE MEDICAL NEGLECT AND FRAUD UPON THE GAL

10. Petitioner's targeted emotional abuse of GAT directly triggered a severe mental and medical crisis, ultimately resulting in GAT being hospitalized at Lincoln Prairie, while his Type-1 diabetes remained out-of-control.

11. During this hospitalization and referral process to Lincoln Prairie, Petitioner knowingly and maliciously lied to medical staff, Respondent, and GAT. She represented that she had spoken with the facility staff to ensure they were equipped to manage GAT's diabetes and monitoring and promised to bring GAT his clothes, toiletries, and necessary medical supplies. Petitioner completely abandoned these promises, intentionally leaving GAT at the facility without his insulin monitoring supplies or basic necessities, causing his blood sugar to become dangerously unmonitored and mismanaged.
12. To cover up her up this retaliatory and neglectful conduct, Petitioner engaged in a calculated campaign of misdirection aimed at the GAL. Petitioner intimidated the children to prevent them from sharing their true custodial preferences or reporting the abuse to the GAL.
13. Through these material misrepresentations, Petitioner fraudulently induced the GAL to recommend abandoning Grant's established, life-saving medical treatment plan at the Mayo Clinic. Instead, the GAL, operating on Petitioner's fabricated narratives made throughout the pendency, recommended placing GAT in the Lincoln Challenge program (for which GAT was medically ineligible due to his Type-1 diabetes) or at a residential facility- Arrowhead Youth Ranch that was, in fact, actively closing and completely ceased operations mere months after the judgment was entered. (See Ex. 1 attached and incorporated herein).
14. Petitioner's detrimental actions also extended to the minor daughter, LLT. Petitioner actively and intentionally concealed LLT's pre-diabetes symptoms and subsequent Type-1 diabetes diagnosis from Respondent. Respondent only learned of this critical, life-altering medical diagnosis independently through VMT and hospital staff.

15. Despite Petitioner's false claims to this Court that Respondent failed to support the children, Respondent has consistently paid for the children's cellular phones and service plans. This financial support was not only necessary to maintain basic parental contact, but was a vital, life-saving necessity so that LLT's continuous glucose monitor apps could function, allowing her blood sugar to alarm and be monitored by Respondent, teachers, and medical staff.
16. Petitioner's misrepresentations and human indifference is further illustrated by her claims of Respondent's lack of support of the minor children, consistently failing to include the foregoing, and repeatedly failing to acknowledge Respondent's immense time, expense, and professional compromises to provide sole care and support for the parties' minor son throughout the pendency and following entry of the judgment, specifically refusing to use monies being held or monies from her appointed position to contribute anything whatsoever despite knowing the minor's medical crises at the time he came to live with Respondent and following through periods of homelessness.

IV. PRAYER FOR RELIEF

WHEREFORE, Respondent, LUKE A. THOMAS, respectfully requests that this Honorable Court:

A. **Incorporate** this Supplement into the pending Petition for Modification of Custody and the Amended Petition for Relief from Judgment (735 ILCS 5/2-1401);

B. **Find** that Petitioner committed extrinsic fraud upon this Court and the Guardian ad Litem, actively concealing conduct that is statutorily to be considered when making custody and support determinations, all to procure the underlying custody and dissolution judgment;

C. **Modify** the allocation of parental responsibilities and parenting time to protect the minor children from further endangerment;

D. **Order** Petitioner to pay support consistent with the needs and expenses of the parties' minor children and available resources of Respondent; and

E. **Award** Respondent such other and further equitable relief as this Court deems just and proper in the best interests of the minor children.

Respectfully Submitted,

LUKE A. THOMAS, Plaintiff
By: /s/ Luke A. Thomas
Luke A. Thomas, pro se
Thomaslitigation2022@gmail.com
ARDC No: 6278591

VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this Supplement to Amended Petition for Relief from Judgment pursuant to 735 ILCS 5/2-1401 and Petition for Modification of Custody are true, complete and correct, except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies aforesaid that I verily believe the same to be true. I further state that the statements made in the foregoing Response to want of knowledge sufficient to form a belief are true.

Dated September 24, 2026

LUKE A. THOMAS, Respondent
By: /s/ Luke A. Thomas
Luke A. Thomas, pro se
Thomaslitigation2022@gmail.com
ARDC No: 6278591

CERTIFICATE OF SERVICE

I, Luke A. Thomas, an attorney at law duly licensed to practice in the State of Illinois, do hereby certify that I served a copy of the foregoing Supplement to Petitions as set forth herein upon Petitioner at her respective electronic mailing address of record.

Gwendolyn M. Thomas: gwenthomaslaw@gmail.com

Signed this 24th day of September, 2026.

LUKE A. THOMAS, Respondent

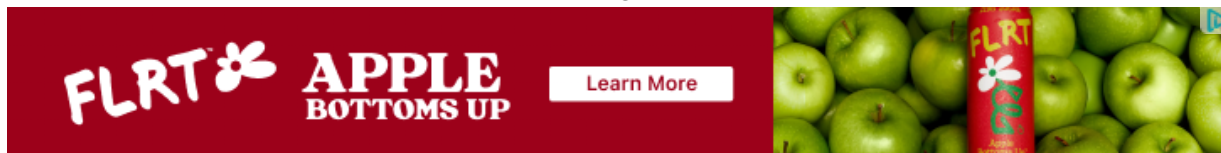
BY:

/s/ Luke A. Thomas

Luke A. Thomas, Respondent

Ex. 1

ADVERTISEMENT



Arrowhead closing residential facility for at-risk youth

CEO says legislation led to severe funding problems and accepting of more dangerous youth



Arrowhead announces closure of its residential programming

By [Heidi Knecht](#) and [Joushua Blount](#)

Published: Mar. 27, 2024 at 11:57 AM CDT | Updated: Mar. 28, 2024 at 7:35 PM CDT



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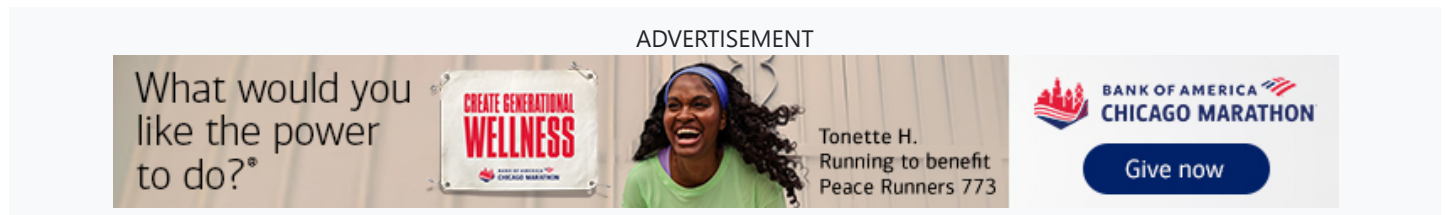


COAL VALLEY, Ill. (KWQC) - Arrowhead Ranch is closing its residential facility for at-risk youth.

Arrowhead Youth & Family Services CEO Luis Moreno said “insurmountable financial challenges” is compelling the shuttering of the only Quad City Area center that schooled, housed and counseled youth.

Also part of the decision was the “increasing severity” of youth admitted, he said. The facility was originally designed for low- or moderate-risk youth.

The final day for the program is April 23. Arrowhead said it will still provide its Day Reporting Center, serving as a resource center and “reentry hub for vulnerable youth.”



The Family First Prevention Services Act changed how Arrowhead operated in 2021, and apparently led to many problems.

“This legislation brought about required changes that significantly impacted the funding landscape for organizations like ours,” he said.

Family First restructured how the federal government spends money on child welfare.

Moreno said the funding provided by the state wasn’t enough to fund the facility as it was.

The demographic of the youth was changing as a result of the legislation, he said. Family First restrictions meant Arrowhead had to accept more dangerous youth.

“The Family First Prevention Services Act,” Moreno said, “has stretched our resources beyond capacity.”

He also said payments from state agencies to Arrowhead for services it provided were consistently delayed.

“Our dedicated staff members have worked tirelessly to empower young people and equip them with the skills and resources necessary to overcome obstacles and thrive,” Moreno said. “We maintain pride in all those who graduated or successfully transitioned through our programs. We know the services we have provided have made a lifelong impact on our residents.”

Roxie Muskeyvalley has been employed by Arrowhead for over 40 years and says it feels like losing a second home.

“I’m sad. It’s I literally grew up here. I started the year after I graduated from high school, and I’ve been here ever since. And I’ve seen a lot of youth come through. I’ve met a lot of staff, many of whom have either gone on or retired. And they still keep in contact with me when we go to lunch or dinner, sometimes the current staff and youth, I have a good rapport with the use of them,” said Muskeyvalley. 

Moreno said the center is working to facilitate the transition for people receiving services from Arrowhead. He said in the coming weeks, Arrowhead will be “working closely with relevant stakeholders to restructure operations.”

Arrowhead was founded in 1945 as the Rock Island County Boys Farm, a private, non-profit treatment facility for at-risk youth aged 12-21, according to the center’s website. It changed its name to Arrowhead in 1958.

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