

1 the 9th.

2 THE RESPONDENT: She had that list on the 10th.

3 THE COURT: On the 10th.

4 THE RESPONDENT: I prepared it on the 10th.

5 THE COURT: Okay. All right. Ms. or Gwen, what -- what's
6 your position on this?

7 THE PETITIONER: The bills, that's not relevant to this
8 petition to rehear.

9 THE COURT: I mean, okay. They're obviously bills. There's
10 no question there's bills and we actually talked about some of
11 these I think over the phone. What -- so the purpose of this is
12 showing that she had notice of these bills and what does that --
13 how does that pertain to the order of protection?

14 THE RESPONDENT: I guess I'm at a loss as to what does
15 pertain to the order of protection at this point. If it is only
16 going to be the audio that was taken on the morning of the 10th,
17 then I guess the Court can decide whether or not that one
18 instance is worthy of an emergency order of protection. There's
19 been no medical evidence presented about my mental instability or
20 any concerns about that. I'm up against the unknown I guess.

21 THE COURT: Well.

22 THE RESPONDENT: I don't know how there can be an
23 evidentiary ruling that violating my constitutional rights that
24 the ex parte order should have allowed removal of my personal

1 property from my home.

2 THE COURT: Well, and that's, once again, that can be a side
3 issue. As I read through it, I mean, it doesn't say that the
4 guns could be removed. It doesn't say they couldn't. It gave
5 her the house. I didn't say -- I didn't read the emergency order
6 to say that --

7 THE RESPONDENT: The box is checked for firearms or the
8 officers executing on that order demanded that the firearms stay
9 there. The only things I could take was my clothing and
10 medicine.

11 THE COURT: Well, yeah, I mean, he wasn't giving you
12 possession of the firearms but he wasn't saying you were, as I
13 read it, now whether she should have had them removed from the
14 house, that can be a separate question but I took it that he
15 wasn't having them disposed of. He wasn't taking them away.
16 They were just staying in the house and you couldn't get to the
17 house so you weren't going to be able to get to your guns at that
18 point.

19 THE RESPONDENT: Well, he refused to allow me to take them.
20 I had to turn them over. They went room by room. I had my
21 personal firearm next to me where I slept that they took. It was
22 a Glock 26. Went room to room and insisted the only thing I
23 could take and they were going to let me take an expired credit
24 card that was in my name. That was the only thing I could take

1 with me. As soon as I was gone, they removed -- within an hour
2 of me vacating the home, her parents and uncle and everybody was
3 there hauling the guns out, hauling all the electronics out,
4 hauling all the ammo out. And I want to know why, what authority
5 and what evidence that was presented at that hearing or at this
6 hearing that would allow the Court to do that and it has already
7 been seems like predetermined that those guns are all of a sudden
8 going to be sold off to pay those marital bills.

9 THE COURT: I never said that. I said that the guns weren't
10 going to be disposed of and Gwen indicated that they weren't.
11 They knew where all the guns were and they're going to have been
12 accounted for and no damage done to them and all that. Because I
13 don't know where this is headed. I brought up that there needs
14 to be some money to survive on here and is that an option.

15 THE RESPONDENT: I wonder why a cancer patient has -- a
16 former cancer patient has to go around unarmed and has a
17 concealed carry and has a valid FOID card based on an order that
18 apparently didn't even cause that restriction.

19 THE COURT: Well, okay. Over your objection, I'm going to
20 let this in and I'll let you argue the weight I should be giving
21 to it.

22 (Whereupon, Respondent's Exhibit No.
23 12 was admitted into evidence.)

24 THE COURT: And it is not just -- it's not just, Luke, one

1 THE PETITIONER: That's fine.

2 THE COURT: You would be able to maybe go to your parents'
3 and have to come back I guess.

4 THE RESPONDENT: She's more than --

5 THE COURT: Okay.

6 THE RESPONDENT: She's welcome to be in the home.

7 THE COURT: That was my next question.

8 THE RESPONDENT: As contentious as it is in here, we have
9 actually been able to be in the same house.

10 THE COURT: Yeah, I have no problem with that as long as you
11 guys are okay with that.

12 THE PETITIONER: Yeah. I mean --

13 THE COURT: I guess you can leave if --

14 THE PETITIONER: If he pisses me off, I can always leave.

15 THE COURT: Okay.

16 THE PETITIONER: So.

17 THE COURT: Let's do that. That way you can see them that
18 morning and stuff and then you'll have them on the weekend and
19 then we'll just keep that going and we'll figure Christmas out
20 when we come back on the 16th but let's get those two bills paid
21 and get your motions on file and then let's try to get those
22 bills done.

23 As far as, Luke, the -- the firearms, I know at one point
24 before the whole thing started, you were looking at maybe selling

1 30 or so of them anyway.

2 THE RESPONDENT: Yeah.

3 THE COURT: Those 30 that you -- had you kind of confirmed
4 what 30 you were going to sell?

5 THE RESPONDENT: I can do that. The problem is I don't have
6 a FOID card.

7 THE COURT: Okay.

8 THE RESPONDENT: Completely uncomfortable with what I know
9 what they listed on their sheet. Many of the -- of the guns have
10 had work done on them, some not functioning. They don't have all
11 the child locks. I simply would like to be the one to maximize
12 the value of the guns. I know their worth, I know the best route
13 to sell them. It was mentioned to me just the other day, well,
14 why can't we just take them to the auction you proposed over in
15 Sullivans on December 10th. It's because I have to have that
16 list to them on September 24th. So it is just those kind of
17 things and I don't know why.

18 THE PETITIONER: Well, maybe I can have Mr. -- contact
19 Mr. Sullivan and see if he would --

20 THE RESPONDENT: Maybe not. Maybe we need to liquid assets
21 that could be used to satisfy (indiscernible).

22 THE PETITIONER: And come down and take a look at the guns
23 and see what he thinks he would be willing to sell. You can be
24 present, too.

1 THE RESPONDENT: I don't even know where they're at or who's
2 going to be present or what condition they're in.

3 THE COURT: Well, and also as far as with ATF and stuff, I
4 mean, if you're selling, can you sell a firearm without a FOID
5 card?

6 THE RESPONDENT: I have to take possession of it and
7 theoretically to transfer from the FFL to myself so the inventory
8 doesn't include -- includes nonmarital guns and is devoid of any
9 ammunition. They took thousands of rounds of ammunition. I have
10 no idea what, where it's at, how it is being stored.

11 THE COURT: All right. Well, I mean.

12 THE RESPONDENT: (Indiscernible) firearms have been taken
13 out and unaccounted for that will be available to me to sell.
14 None of it.

15 THE COURT: Well, and you say you're putting that in a
16 motion, that's fine. A pleading. But I am, I mean, I am going
17 to have to have a -- I'm going to have to know, you know,
18 (indiscernible) got probably evidence on what the -- what the --
19 what the condition of the guns were when whoever took them took
20 them.

21 THE PETITIONER: Yeah. It would be the same condition as
22 when they were taken.

23 THE COURT: Well, and I would be giving even a supervisor,
24 Luke, I would probably inclined to give you an opportunity to

1 review what we're selling to make sure it is sellable. I mean,
2 I'm going to have someone present. If I can get law enforcement
3 to watch over it, we will. I mean, I think that's fair for you
4 to be able to --

5 THE RESPONDENT: Yeah, I think it's fair but they wouldn't
6 even give me, wouldn't even make a report of what was taken of
7 the house.

8 THE COURT: Well, I'm going to have to have -- I'm going to
9 have to have a report and you're going to have an opportunity to
10 see the report and you can -- if you have evidence to the
11 contrary, then people are going to have to, under oath, say what
12 they did or didn't do and then if they want to take the chances
13 on if they took something they shouldn't or something was broken
14 or whatever, we'll have to -- I'll have to decide it apparently.
15 But then you'll have to decide what you're saying is marital and
16 nonmarital. We don't have to get into that now but that's --

17 THE RESPONDENT: In order to really present a case to the
18 Court, too, we're each going to need some sort of moneys for
19 litigation expenses. There's at least two depositions I have to
20 take in order to even adequately present a case.

21 THE COURT: Well, let's cross that bridge when we get there.
22 Okay. So let me write up a -- do you have -- I've got one right
23 here. Let me -- okay. So all right. And I want, you know, I'm
24 willing to do just as soon as you hear from Charlie Burton --

1 THE PETITIONER: I'll step out, I'll step out and call him
2 actually while you're writing the order.

3 THE COURT: Okay. He may be at lunch.

4 THE PETITIONER: That's true.

5 THE COURT: But, yeah, I would like to know because just as
6 soon as that money comes in, let's, I mean, let's talk about it
7 and see what we're going to do with it and see if we can't --

8 THE PETITIONER: And if Judge Wessel is here, I can get a
9 date, just file a motion if Charlie hasn't gotten his client in.

10 THE COURT: Yeah. I mean, that's -- that's what we can -- I
11 mean, yeah.

12 THE PETITIONER: Wessel is the judge presiding over the
13 case.

14 THE COURT: And then as far as you, the other two estates,
15 there's nothing on the computers that you're saying Luke is
16 keeping you from doing that you can finish that work. It is just
17 whether you need --

18 THE PETITIONER: Well, I have to access to CosmoLex.

19 THE COURT: Okay. Which you're going to have.

20 THE PETITIONER: I'm going to have that.

21 THE COURT: And so those two estates will be worked on.

22 THE PETITIONER: Yep. Yep.

23 THE COURT: Okay. All right. And then, Luke, what's the
24 status of your disability?

1 THE RESPONDENT: I just recently started the application.

2 THE COURT: Okay. All right. Did you ever check with DOT
3 on their IT Department at least in the short term?

4 THE RESPONDENT: I haven't because I wouldn't have
5 transportation.

6 THE COURT: Okay.

7 THE PETITIONER: He told me he refused to work over there.
8 There's no way that (indiscernible).

9 THE RESPONDENT: For instance, I have a vehicle out there
10 that doesn't even have a windshield wiper. I asked for money to
11 buy a windshield wiper. I can't even get that so --

12 THE COURT: Okay. Well, and I'm not saying it was long term
13 and stuff. I know you're good at IT and at least if they -- it's
14 benefits and all that starting out at least to get going.

15 THE RESPONDENT: Sure.

16 THE COURT: You can always go back to the practice of law or
17 quit but I mean, okay. I'll go back in chambers and write, write
18 out this order and then I'll come back out and give it to you
19 guys.

20 (Pause in proceedings.)

21 THE COURT: We're back on the record, same parties present.
22 The Court is going to direct respondent to return the -- was it a
23 \$740 ARDC check?

24 THE PETITIONER: 770.

1 THE COURT: Okay. \$770 ARDC check to the petitioner.
2 Petitioner to pay the phone bill and the \$210 CosmoLex bill.
3 Petitioner is given full access to the accounts. Petitioner to
4 bill the Drainage District a complete work on the three estates
5 mentioned in court. Work towards those. Respondent to send out
6 account receivable bills that can be billed, okay. Parties have
7 pleadings filed within seven days. Hearing will be on December
8 the 16th, 2022 at 9:00 a.m. Respondent allowed parenting time on
9 Thanksgiving Day from 9:00 a.m. to 12:30 p.m. and petitioner may
10 remain in the home if she wants.

11 THE RESPONDENT: One provision, Judge, as far as sending out
12 accounts receivable, I'm going to need money for stamps.

13 THE COURT: Okay. Let's -- as far as December the 6th, what
14 I'll probably do is, I mean, we can set up a -- you want to set
15 up a phone conference before then? I'm going to include Alison
16 Vawter on it.

17 THE PETITIONER: Yes.

18 THE COURT: In fact, I would encourage you both to talk to
19 her, tell her what your concerns are, what you're both willing to
20 do. Maybe -- maybe something can be reached out. I mean, you
21 know, if Luke is going to say he's going to pay it and hold you
22 harmless, I mean, whether he files bankruptcy or not, I don't
23 know. But you're saying that doesn't hold you harmless if you
24 think they can still come at you (indiscernible).

1 THE PETITIONER: Correct. They could still come after me.

2 THE COURT: So discuss that with Ms. Vawter. I mean, quite
3 frankly if maybe some estate money comes in, we can divide it up
4 and, Luke, if you're saying you'll pay that right then, then I
5 would be inclined to let you go.

6 THE RESPONDENT: Yeah.

7 THE COURT: But if not, then I'll certainly listen -- listen
8 to that. Okay. Let's -- let's do something. How about, well,
9 to make sure everybody has enough time, let's do a phone
10 conference how about Wednesday, November 30th later in the day.
11 I've got an all-day custody case but if we did something like at
12 4:00 o'clock.

13 THE PETITIONER: Sure.

14 THE COURT: Okay. And I will -- I will initiate as far as
15 phone call, I mean, phone numbers, I think I've got the right
16 numbers so okay. So phone status on Mayos on what did I just
17 tell you? What date did I just tell you? November 30th at
18 4:00 p.m. Okay. That's what we'll do.

19 Deputy, if you want to give them each a copy of that.

20 Once again, guys, if something comes up, certainly we can do
21 this as informal as we can. Just make sure each one of you is in
22 the loop. Call me or text me and if there is something we can
23 discuss, we will and try to get to it.

24 And then, Luke, on that December 16th date, I'll bring up

1 the law case for a status probably and then your criminal case
2 and you can tell me where we're at on it and we'll kind of go
3 from there. Okay.

4 THE RESPONDENT: Sure.

5 THE COURT: All right. Thank you both.

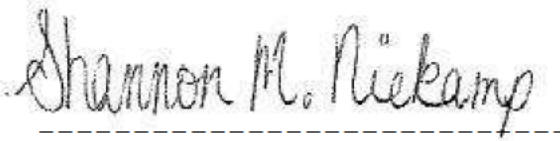
6 THE RESPONDENT: Thank you, Judge.

7 THE COURT: See you then.

8 (Which was all the evidence offered and received and all
9 other proceedings had on the electronically recorded hearing of
10 said cause on this date.)
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1 IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
2 CASS COUNTY, ILLINOIS
3
4

5 I, Shannon M. Niekamp, an Official Court Reporter for the
6 Circuit Court of Adams County, Eighth Judicial Circuit of
7 Illinois, transcribed the electronic recording of the hearing in
8 the above-entitled cause to the best of my ability and based on
9 the quality of the recording, and I hereby certify the foregoing
10 to be a true and accurate transcript of said electronic
11 recording.
12

13
14 
15

16 OFFICIAL COURT REPORTER
17
18
19
20
21
22

23 Dated this 15th day
24 of June, 2023.

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT

CASS COUNTY, ILLINOIS

GWENDOLYN M. THOMAS,)
)
 Petitioner,)
)
 -vs-) No. 2022-OP-66
) 2022-DC-15
 LUKE A. THOMAS,)
)
 Respondent.)
)

REHEARING

REPORT OF PROCEEDINGS from the electronically recorded
hearing held on the 21st day of October, 2022, before the
HONORABLE JERRY J. HOOKER.

APPEARANCES:

MS. GWENDOLYN M. THOMAS
Attorney at Law

The Petitioner, on her own behalf.

MR. LUKE A. THOMAS
Attorney at Law

The Respondent, on his own behalf.

Electronically recorded proceedings transcribed by:

SHANNON M. NIEKAMP, CSR
License No. 084-004832
Official Court Reporter
Adams County Courthouse
521 Vermont Street
Quincy, IL 62301

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

GWENDOLYN M. THOMAS,

Petitioner,

vs.

LUKE A. THOMAS,

Respondent.

No. 2022-OP-66

ORDER NUNC PRO TUNC

This matter comes before the Court on its own Motion. The Court, being advised Respondent's Illinois Firearm Owner's Identification Card appears to remain in "*Suspended*" status according to the records maintained by the Illinois State Police as a result of the Ex-Parte Emergency Order of Protection entered on or about September 11, 2022, makes the following findings and clarifications:

1. On October 21, 2022, this Court entered an Order granting Respondent's Petition to Rehear the Petition for Ex-Parte Emergency Order of Protection. Respondent, Luke A. Thomas, d/o/b/ 07-19-1975, did not receive notice of the hearing prior to the Ex-Parte Emergency Order of Protection. Upon hearing and notice, this Court entered an order vacating the emergency order of protection which originally led to the suspension of Respondent's FOID card.
2. There were no allegations of the use or threat of use of firearms or any other weapon raised in the original Petition and no evidence presented to this Court.
3. There exists no legal or factual basis for Respondent's FOID card to have remained in *suspended* status after the Court vacated the aforesaid Emergency

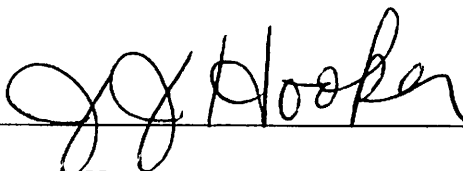
Order and there exists no legal or factual basis for any federal firearm disability to apply.

4. Respondent has, at all times, otherwise continued to meet the eligibility requirements for an Illinois FOID card.

IT IS ORDERED:

1. The Emergency Order of Protection entered on September 11, 2022 and any continuation thereof is and remains vacated as made of record by this Court on October 21, 2022;
2. The Clerk of this Court shall promptly forward a certified copy of this Order to the Illinois State Police FOID division;
3. The Clerk of this Court shall promptly forward a copy of this Order to the Cass County Sheriff and the Sheriff shall promptly confirm LEADS reflects this Court's order vacating the Emergency Order of Protection on October 21, 2022.

Enter: Nunc Pro Tunc to October 21, 2022



Judge Jerry J. Hooker



Luke Thomas <thomaslitigation2022@gmail.com>

Re: Phone for today's call

1 message

Jerry Hooker <jerryjhooker@gmail.com>

Wed, Feb 8, 2023 at 10:06 AM

To: Luke Thomas <thomaslitigation2022@gmail.com>

Cc: Gwendolyn Thomas <gwenthomaslaw@gmail.com>

Gwen, I have sent Luke a text indicating my Sheriff can assist him in fast tracking his FOID request. I didnt want there to be any appearance of ex parte communication so thats why im sending this email. Judge Hooker

On Tue, Feb 7, 2023 at 7:29 AM Luke Thomas <thomaslitigation2022@gmail.com> wrote:

Judge and Gwen,

Please call me at [REDACTED] for our call this morning. Thank you.

Luke



[Home](#) » [Officials](#) » Sheriff's Office

SHERIFF'S OFFICE

Brown County Sheriff's Office



Sheriff Justin D. Oliver was elected in 2022 with 17 years of experience in law enforcement.
The county population is 6,244 with 307 square miles.

Latest Sheriff's Reports

[Sheriff's Report - May 18, 2026](#)

[Sheriff's Report - May 11, 2026](#)

[» VIEW MORE SHERIFF'S REPORTS](#)

Sheriffs Elected from this County

From 1928 (Year ISA was Established) To Present
This list includes only those Sheriffs elected to a 4-year term.

CONTACT INFORMATION

 [217-773-2061](tel:217-773-2061) Ext: 1

 200 Court St., Room 1
Mt. Sterling, IL 62353



JUSTIN D. OLIVER

Sheriff

 sheriff@browncoil.org

PHIL CRARY

Chief Deputy

JEAN HULVEY

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2. Police beat for Monday, March 6
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5. 66th Beaux Arts Ball leans into Hepburn's elegance

NEWS

Teen suing over pursuit, shot being fired in 2015 traffic stop



David C.L. Bauer, dbauer@s24533.p831.sites.pressdns.com
Dec. 13, 2016



MOUNT STERLING — A police patrolman who fired a shot at a teenage girl's car as she tried to flee, is now facing a federal lawsuit that contends his actions were an excessive and dangerous violation of the Fourth Amendment.



The lawsuit, filed Friday in U.S. District Court in Springfield, names Mount Sterling Patrolman Chase Fox and Brown County.

The legal action by Lyndsey Pittman of Rushville, now 19, presents parallels to the official report about the events of Oct. 21, 2015, but challenges some of the police narrative.

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ACT NOW

A lawsuit presents only one side of a claim. Neither Fox nor Brown County officials have had a chance to respond to the allegations.

Authorities said in October 2015 that Fox stopped Pittman's car at Main and North West Cross streets and said he noticed the smell of marijuana coming from the vehicle. Fox said he asked the girl, then 17 years old, to step out of the car and detained her, and then started talking to an 18-year-old passenger, Will C. Lauzon of Rushville.

Pittman said in the complaint that at no time did she pose a threat. She acknowledged being stopped and asked if there was marijuana in the vehicle, to which she said "no."

"Without further cause, Officer Fox directed [Pittman] out of her vehicle and required her to stand in the public street in front of his squad car. [Her] passenger then exited ... and requested Officer Fox to let him know why he and [Pittman] were being detained. Officer Fox became agitated and directed [the] passenger to get back into the vehicle. As the passenger entered the vehicle as directed, Officer Fox violently grabbed the passenger and forced him out of the vehicle despite having given the direction to get into the vehicle moments before," according to the suit.

According to the police report, Pittman managed to escape from custody and make it back to her vehicle in an attempt to flee the scene.



Next Up: See inside Abandoned Millennium Hotel in St. Louis

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ACT NOW

...e to assist and reached through the
...ugh the passenger side. After a brief
...ort.

“Upon exiting the then-moving vehicle and not seeing the deputy, [Fox] discharged his weapon in the direction of the fleeing vehicle,” according to the police report.

Pittman’s lawsuit said that being a minor “and in fear of Officer Fox,” she re-entered her vehicle, “properly signaled” and began to drive away.

“Fox immediately ran toward the vehicle, and as [Pittman] drove away and was less than 100 feet away, Officer Fox drew his service weapon and fired at least one shot at [her], shooting her back window out, thereby further placing [Pittman] in great fear for her life and safety,” according to the complaint. “Despite being a minor and despite being a traffic stop for an alleged minor traffic [offense], Officer Fox then re-holstered his weapon and initiated a high-speed pursuit.”

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Orris named Colleague of Month at Jacksonville Memorial

Routt graduate promoted to lieutenant colonel

Cass-Morgan Farm Bureau scholarship applications available

Police reports said Pittman's car was chased west out of Mount Sterling on U.S. 24. Pittman lost control of the car near the Brown and Adams counties line and it went into a field. She was able to leave the scene before officers arrived but was found walking in a field a short distance away, according to the police report.

She was treated at Culbertson Memorial Hospital and released before being taken to the Schueller County Jail

Pittman said in the lawsuit that she was "fearful for her life and safety" and "continued to c
to her mother by cellphone" for advice.

"Officer Fox's pursuit ... exceeded speeds of over 100 mph, which led [Pittman] to lose con
violently roll and destroy her car and sustain injury," according to the lawsuit. "Officer Fox

X

Form **LLC-50.1**

Illinois
Limited Liability Company Act
Annual Report

FILE #

Due prior to: 06/01/2023

Secretary of State
Department of Business Services
Limited Liability Division
501 S. Second St., Rm. 351
Springfield, IL 62756
www.ilsos.gov

Filing Fee: 75.00
Series Fee, if required:
Penalty:
Total: 175.00

FILED

September 6, 2023

Alexi Giannoulas
Secretary of State

1. Limited Liability Company Name: OLIVER FIREARMS TRAINING & SALES, LLC

Registered Agent: JUSTIN D OLIVER

930 1035N AVENUE

MT SERLING, IL 62353

2. State or Country of Organization: IL Date Organized in or Admitted to Illinois: 06/12/2014

3. Address of Principal Place of Business:

930 1035N AVENUE MT STERLING, IL 62353

4. Name and business address of all managers and any member having the authority of manager:

OLIVER, JUSTIN D
930 1035N AVENUE MT STERLING, IL 62353

5.

6. Changes to the registered agent and/or registered office must be submitted on Form LLC-1.36/1.37.

7. I affirm, under penalties of perjury, having authority to sign thereto, that this Annual Report is to the best of my knowledge and belief, true, correct and complete.

Dated: September 6, 2023
Month/Day Year

JUSTIN D. OLIVER

Name

OWNER

Title

OLIVER, JUSTIN D

MANAGER

If applicant is a company or other entity, state Name of Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

LYNDSEY J. PITTMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:16-cv-3314
	)	
CITY OF MOUNT STERLING, ILLINOIS	)	
OFFICER CHASE FOX, individually	)	
and in his capacity as police officer with	)	
City of Mount Sterling, Illinois Police	)	
Department	)	
	)	
Defendant.	)	

**DEFENDANT CITY OF MOUNT STERLING, ILLINOIS
RULE 26(a)(1) DISCLOSURES**

NOW COMES Defendant, CITY OF MOUNT STERLING, ILLINOIS, by and through its attorneys, FRANCO & MORONEY, LLC, by their attorneys, Franco & Moroney, LLC, hereby submit their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

QUALIFICATIONS AND OBJECTIONS

The following disclosures are based upon the information presently available to Defendant. Defendant's investigation into the subject matter of the disclosures continues and Defendant reserves the right to revise and/or supplement the following information pursuant to Rule 26(e) of the Federal Rules of Civil Procedure during the course of discovery in this action.

Defendant further states that the information set forth in these disclosures may include hearsay and other forms of information which are unreliable, irrelevant, and/or otherwise not admissible in evidence. Moreover, nothing herein is intended or should be construed as admissions of fact and/or law or waiver of any privilege. Defendant reserves all objections relating to the information proffered herein.

Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information

1. **Lyndsey Pittman
c/o Luke A. Thomas
McClure, Thomas & Thomas
113 South State Street
P.O. Box 170
Beardstown, Illinois 62618-0170**

The Plaintiff, Lyndsey Pittman, may provide information regarding her education, background, training and experience. She will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including her involvement with the same and statements made by any individuals concerning the same. She will provide information regarding any alleged injuries and/or damages purportedly sustained, if any, by Plaintiff due to the above described traffic stop, pursuit, and arrest. She will also testify in accordance with her deposition testimony if taken.

2. **Chase Fox
c/o Jeffrey Scott Barger
Esp, Kreuzer, Cores, & McClaughlin, LLP
400 S County Farm Road
Wheaton, IL 60187**

The above witness was an officer with the Mount Sterling Police Department during the events relevant to Plaintiff's Complaint. He will provide information regarding his background, training and experience in law enforcement. He will provide information regarding his job duties, responsibilities, and work performed for the Mount Sterling Police Department. He will also provide information regarding his employment with Mount Sterling Police Department, the work he performed for Mount Sterling Police Department, and any training he received from the Mount Sterling Police Department and/or any outside entity. He will provide information regarding his resignation from the Mount Sterling Police Department. He will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including his

involvement with the same and statements made by any individuals concerning the same. He may also provide information regarding Mount Sterling Police Department's policies and procedures, including but not limited to the Mount Sterling Police Department's policies and procedures concerning traffic stops, arrests, the discharge of firearms, and vehicular pursuit. He will also provide information regarding any communications he had with Plaintiff, Defendant Fox, Deputy Anderson, Deputy Oliver, and/or any Brown County Sheriff, Mount Sterling Police Department, or Illinois State Police employees concerning Plaintiff and/or the October 21, 2015 incident described above. He may also provide information the customs and practices of the Mount Sterling Police Department and its employees, and any other relevant documents, photographs, statements and other evidence which the parties may obtain through the course of discovery. He will also testify in accordance with his deposition testimony if taken.

**3. Will Lauzon
536 West Lafayette
Rushville, Illinois 62681**

The above witness may provide information regarding his education, background, training and experience. He will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including his involvement with the same and statements made by any individuals concerning the same. He will provide information regarding any alleged injuries and/or damages purportedly sustained, if any, by Plaintiff due to the above described traffic stop, pursuit, and arrest. She will also testify in accordance with her deposition testimony if taken.

**4. Deputy Justin Oliver
Brown County Sheriff's Office
200 East Court Street
Mount Sterling, Illinois, 62353**

**5. Deputy E. Anderson
Brown County Sheriff's Office
200 East Court Street
Mount Sterling, Illinois, 62353**

The above witnesses were employees of the Brown County Sheriff's Office during the events relevant to Plaintiff's Complaint. They will provide information regarding their background, training and experience in law enforcement. They will provide information regarding their job duties, responsibilities, work performed for Brown County Sheriff's Office, and any training provided to them by the Brown County Sheriff's Office and/or any outside entity. They will provide information their relationship and previous law enforcement experiences with Defendant Fox. They will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including their involvement with the same and statements made by any individuals concerning the same. They may also provide information regarding Brown County Sheriff's Office's policies and procedures, including but not limited to the Brown County Sheriff's Office's policies and procedures concerning traffic stops, arrests, the discharge of firearms, and vehicular pursuit. They will also provide information regarding any communications they had with Plaintiff, Defendant Fox, Deputy Anderson, Deputy Oliver, Chief Norris and/or any Brown County Sheriff, Mount Sterling Police Department, or Illinois State Police employees concerning Plaintiff and/or the October 21, 2015 incident described above. They may also provide information regarding the customs and practices of the Brown County Sheriff's Office and its employees, and any other relevant documents, photographs, statements and other evidence which the parties may obtain through the course of discovery. They will also testify in accordance with their deposition testimony if taken.

**6. Brandon Norris
Chief of Police
Mount Sterling Police Department**

**c/o Franco Moroney, LLC
500 West Madison, Suite 2440
Chicago, Illinois 60661**

The above witness was Chief of Police of Mount Sterling Police Department during the events relevant to Plaintiff's Complaint. He will provide information regarding his background, training and experience in law enforcement. He will provide information regarding his job duties, responsibilities, and work performed as Chief of Police. He will also provide information regarding Defendant Fox's employment with Mount Sterling Police Department, the work performed by Defendant Fox for Mount Sterling Police Department, and any training provided to Defendant Fox by the Mount Sterling Police Department and/or any outside entity. He will provide information regarding Defendant Fox's job duties and responsibilities, his relationship with Defendant Fox, and Defendant Fox's resignation from the Mount Sterling Police Department. He will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including his involvement with the same and statements made by any individuals concerning the same. He may also provide information regarding Mount Sterling Police Department's policies and procedures, including but not limited to the Mount Sterling Police Department's policies and procedures concerning traffic stops, arrests, the discharge of firearms, and vehicular pursuit. He will also provide information regarding any communications he had with Plaintiff, Defendant Fox, Deputy Anderson, Deputy Oliver, and/or any Brown County Sheriff, Mount Sterling Police Department, or Illinois State Police employees concerning Plaintiff and/or the October 21, 2015 incident described above. He may also provide information regarding any agreements between the Mount Sterling Police Department and its employees pertaining to the work performed for the Mount Sterling Police Department, the terms and conditions of any such agreements, the customs and practices of the Mount Sterling Police Department and its

employees, and any other relevant documents, photographs, statements and other evidence which the parties may obtain through the course of discovery. He will also testify in accordance with his deposition testimony if taken.

**7. Investigator
Illinois State Police
General Investigations Division
801 South 7th Street
Springfield, IL 62703**

The above witness was Chief of Police of Mount Sterling Police Department during the events relevant to Plaintiff's Complaint. He will provide information regarding his background, training and experience in law enforcement. He will provide information regarding his job duties, responsibilities, and work performed as Chief of Police. He will also provide information regarding Defendant Fox's employment with Mount Sterling Police Department, the work performed by Defendant Fox for Mount Sterling Police Department, and any training provided to Defendant Fox by the Mount Sterling Police Department and/or any outside entity. He will provide information regarding Defendant Fox's job duties and responsibilities, his relationship with Defendant Fox, and Defendant Fox's resignation from the Mount Sterling Police Department. He will provide information regarding the traffic stop, pursuit, and arrest involving Plaintiff on October 21, 2015, including his involvement with the same and statements made by any individuals concerning the same. He may also provide information regarding Mount Sterling Police Department's policies and procedures, including but not limited to the Mount Sterling Police Department's policies and procedures concerning traffic stops, arrests, the discharge of firearms, and vehicular pursuit. He will also provide information regarding any communications he had with Plaintiff, Defendant Fox, Deputy Anderson, Deputy Oliver, and/or any Brown County Sheriff, Mount Sterling Police Department, or Illinois State Police employees concerning Plaintiff

and/or the October 21, 2015 incident described above. He may also provide information regarding any agreements between the Mount Sterling Police Department and its employees pertaining to the work performed for the Mount Sterling Police Department, the terms and conditions of any such agreements, the customs and practices of the Mount Sterling Police Department and its employees, and any other relevant documents, photographs, statements and other evidence which the parties may obtain through the course of discovery. He will also testify in accordance with his deposition testimony if taken.

8. Individuals Disclosed By Plaintiff and Defendant Fox

Defendant hereby discloses any individuals identified in Plaintiff or Defendant Fox's Rule 26 disclosures as if fully stated herein as individuals who might have relevant knowledge and who may be called to offer relevant information to the claims and defenses asserted in this lawsuit.

Rule 26(a)(1)(ii): Categories and Location of Documents Relevant to the Disputed Facts

Defendants have produced the below documents / categories of documents it currently has within its possession, custody, or control that are potentially relevant to the disputed facts. Paper copies will be sent under separate cover.

1. Defendant Fox Resignation Letter, December 21, 2015;
2. Mount Sterling Police Department Police Report concerning October 21, 2015 arrest of Plaintiff;
3. Mount Sterling Police Department Policies and Procedures relevant to this matter;
4. Defendant Fox's Personnel File;
5. Dashcam Video from Officer Fox's Patrol Car, October 21, 2015 (2 videos total)

Rule 26(a)(1)(iii): Computation of Damages

Not applicable to Defendant.

Rule 26(a)(1)(iv): Insurance Policies that May Satisfy the Judgment

Defendant will produce for inspection and copying its insurance agreement with Selective Insurance Company which may satisfy a judgment entered on this action or reimbursement for payments made to satisfy the judgment.

\s\ Randall W. Slade

Randall W. Slade

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Chicago, Illinois 60661-2510

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ARDC No. 6290778

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Illinois