

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

[REDACTED], )  
Plaintiff. )  
v. )  
The Village of Shannon and Butch Meinders, )  
Defendants. )

**COMPLAINT AT LAW**

**Now Comes** Plaintiff [REDACTED] ("Plaintiff"), by attorneys Dore Law Offices LLC, Daniel I. Schlade and James M. Dore, and in complaining against Defendants The Village of Shannon and Butch Meinders (cumulatively "Defendants"), states:

**Introduction**

1. This action seeks money damages because of the Defendants' actions to wrongful deprive Plaintiff's free speech rights and unconstitutional sexual discrimination. Defendants acted under color of state law and violated Plaintiff's rights under the First and Fourteenth Amendment to the Constitution of the United States.

**Parties**

2. Plaintiff is a female and resident of Carroll County, in the state of Illinois.
3. Defendant The Village of Shannon ("The Village") is an Illinois municipal corporation that operates and administers the municipal government. It is governed by six Trustees and an elected President.
4. At all relevant times herein, Defendant Butch Meinders was a male and a Trustee of The Village.

**Jurisdiction And Venue**

5. This Court has jurisdiction over Plaintiff's federal claims under 28 U.S.C. §§ 1331 and 1343.

6. Venue in the United States District Court for the Northern District of Illinois is proper pursuant to 28 U.S.C. § 1331 because all underlying facts and transactions occurred in or about Carroll County, Illinois.

### **Facts Common To All Claims**

7. Plaintiff has been an active member in the Village of Shannon community, frequently attending Village Board Meetings and recently running for Village President in 2025. She lost the election to current Village President Ryan J. Shaner.

8. In many instances, Plaintiff has voiced criticism for the policies of the Village, which has placed her in conflict with the Village's Board and President.

9. On May 6, 2025, Plaintiff attended a Village Board Meeting. Immediately after the Board meeting, she went to a local bar. Village Trustees Steve Miller and Butch Meinders and the Village's Chief of Police Mike Lewis entered shortly thereafter, directly from the Board meeting.

10. Plaintiff discussed Village business with Village Trustees Steve Miller and Butch Meinders; as part of the conversation, Village Trustee Meinders stated he was disappointed that Village President Shaner selected Miles Manthey for the position of Village Trustee over Plaintiff.

11. While having a conversation with the bartender, Plaintiff showed her the new tattoo she obtained. She pulled her left arm out of her long-sleeve pullover to do so. Immediately after she pulled out her left arm, Village Trustee Meinders stated:

"Here I thought you were going to whip your titties out and flash me."

12. Plaintiff immediately responded that she has never done that in her life, and would not perform such an act. Horrified and embarrassed, Plaintiff began to leave.

13. As Plaintiff was leaving, Village Trustee Meinders turned to her and said:

"Sitting next to you all night has me horny, I'm going home to bother my wife."

14. After the events of May 6, Plaintiff has become aware that Village Trustee Meinders has stated Plaintiff has or had an inappropriate relationship with a fellow member of the community.

15. Village Trustee Meinders's statements in par. 14 are false.

16. On June 20, 2025, Plaintiff and her husband met with Village President Shaner and Village Trustee Kyle Ruter to discuss the events of May 6, 2025 and what had occurred afterwards. Plaintiff explained to Village President Shaner that:

- Village Trustee Meinders and Plaintiff had been discussing Village business at the bar after the Board meeting;
- Village Trustee Meinders's conduct was retaliatory in response to Plaintiff's active participation in the Village's Board meetings and intended to intimidate Plaintiff from further participation in Board meetings;
- Plaintiff had exercised her free speech rights and her right to participate in Village Board meetings, and Village Trustee Meinders harassed her for doing so;
- Because of Village Trustee Meinders's conduct, Plaintiff would not run for a Village Trustee position now;
- Village Trustee Meinders should resign, or, in the event he refused, the Board should take actions to discipline him based on his conduct;

17. Since June 20, 2025, the Village has taken no action to discipline, censure, or reprimand Village Trustee Meinders for his conduct.

18. Since May 6, 2025, Village Trustee Meinders has stated to community members that he would never be held accountable for his conduct towards Plaintiff. He has stated no one would believe Plaintiff's account of what happened because of his position as Village Trustee.

19. On June 25, 2025, Shannon Police Chief Lewis requested Plaintiff to meet with him, acting on behalf of Village Trustee Ruter (who was acting president at the time in Village President Shaner's absence).

20. Plaintiff attended the meeting, hoping that the Village was now willing to hold Village Trustee Meinders accountable for his conduct. However, this did not occur.

21. Rather than offer transparency, Police Chief Lewis, at Village Trustee Ruter's direction and on behalf of the Village, pressured Plaintiff to remain silent regarding Village Trustee Meinders's conduct.

22. Police Chief Lewis, at the direction of Village Trustee Ruter and acting on behalf of The Village, informed Plaintiff that if Plaintiff remained silent regarding Village Trustee Meinders's conduct, The Village would take action to dismiss or otherwise ignore an ordinance violation that it had issued against Plaintiff.

23. Plaintiff refused to make such an agreement.

24. On June 26, 2025, Plaintiff sought a variance from the Village so that she could sell ice cream for one of her businesses and emailed the Village President Shaner and members of the Board regarding the same.

25. The Village never responded to Plaintiff's request.

26. During the same timeframe, the Village has acted on another resident's variance request and addressed the request at a Board meeting in September 2025.

27. Since June 2025, The Village has exerted pressure on Shannon Police Chief Lewis to misrepresent what he was directed to offer to Plaintiff on June 25, 2025, and the circumstances surrounding such offer; however, Chief Lewis has refused to falsely state what happened.

28. As a result of Shannon Police Chief Lewis's refusal to make false statements, The Village suspended him for 5 days from his position, using false pretenses for the suspension, specifically a missing receipt. Shannon Police Chief Lewis had not been disciplined prior to this instance.

29. Further, in September 2025, Village President Shaner posted on Facebook an allegation that Plaintiff's 6-year old son "repeated words of hostility he had clearly heard at home."

30. Through the Facebook post, The Village, through its President, publicly maligned Plaintiff's 6-year old son and sought to further intimidate Plaintiff.

### **The Village's Code**

31. The Village, pursuant to its authority as a municipality, has enacted the Village Code of Shannon, Illinois ("The Village Code").

32. The Village Code contains the following provisions, applicable to this suit:

- The members of the village board of trustees shall perform all such duties as are or may be prescribed by law, by this code or by the ordinances of the village, and shall faithfully perform the duties of their office to the best of their skill and ability; Village Code 1-6-1(A);
- The village president shall perform all such duties as are or may be prescribed by law, by this code or by the ordinances of the village, and shall take care that the laws, the provisions of this code and the ordinances are faithfully executed;

- The offering or making of gifts prohibited to be offered or made to an officer or employee of the village under the act is hereby prohibited; Village Code 1-8-4(A)(2);
- Prohibition On Sexual Harassment: A. Prohibition On Sexual Harassment: It is unlawful to harass a person because of that person's sex. The courts have determined that sexual harassment is a form of discrimination under Title VII of the U.S. Civil Rights Act of 1964, as amended in 1991. All persons have a right to work in an environment free from sexual harassment. Sexual harassment is unacceptable misconduct which affects individuals of all genders and sexual orientations. It is a policy of the village to prohibit harassment of any person by any municipal official, municipal agent, municipal employee or municipal agency or office on the basis of sex or gender. All municipal officials, municipal agents, municipal employees and municipal agencies or offices are prohibited from sexually harassing any person, regardless of any employment relationship or lack thereof.; Village Code 1-9-2(A);
- Conduct which may constitute sexual harassment includes: Verbal: sexual innuendos, suggestive comments, insults, humor, and jokes about sex, anatomy or gender-specific traits, sexual propositions, threats, repeated requests for dates, or statements about other employees, even outside of their presence, of a sexual nature; Village Code 1-9-2(C)(2)(a);
- The village assures that it will actively provide nondiscriminatory outreach, selection, and service to all individuals; Village Code 1-9-3(C);
- All village employees are expected to adhere to this policy and to work actively for its implementation both internally and in carrying out village program activities; Village Code 1-9-4;

#### **Count I – Section 1983 Violation – Sexual Harassment – Butch Meinders**

33. Plaintiff incorporates Paragraphs 1-32, as if set forth in full herein for this Paragraph 33.

34. Village Trustee Butch Meinders subjected Plaintiff to sexual harassment on the basis that she is female.

35. In sexually harassing Plaintiff, Village Trustee Meinders was acting under color of state law.

36. As a result, Village Trustee Meinders deprived Plaintiff of her rights under the Equal Protection Clause of the 14<sup>th</sup> Amendment of the United States Constitution.

37. At all times hereto, Village Trustee Meinders's conduct toward the Plaintiff was intentional, malicious, wanton and with the reckless disregard for and depraved indifference to the Plaintiff's health and constitutional rights.

38. As a result of Village Trustee Meinders's violations of 42 USC 1983, Plaintiff has suffered actual damages including lost wages, medical expenses, past and future emotional distress, punitive damages, and attorneys fees and costs.

**WHEREFORE**, the Plaintiff prays for a judgment against the Defendant Butch Meinders, and the following relief:

- (1) a judgment for compensatory damages;
- (2) for a judgment of punitive damages;
- (3) reasonable attorney fees pursuant to 42 U.S.C. §1988 plus costs of this suit;
- (4) and any other such further relief as this Court deems appropriate.

#### **Count II – Section 1983 Violation – Sexual Harassment – The Village**

39. Plaintiff incorporates Paragraphs 1-38, as if set forth in full herein for this Paragraph 38.

40. Shortly after its occurrence, the Village became aware of Village Trustee Meinders's sexual harassment of Plaintiff.

41. The Village has not disciplined, censured, or reprimanded Village Trustee Meinders's conduct.

42. The Village offered Plaintiff concessions in her ordinance violation dispute with it in return for going silent with regard to her allegations.

43. The Village has ignored Plaintiff's requests regarding a zoning variance while addressing another citizen's requests.

44. The Village has provided Plaintiff warnings regarding other potential ordinance violations while ignoring another citizen's purported violations of the same ordinance

45. The Village has posted negative assertions regarding Plaintiff's 6-year old son.

46. Rather than address Village Trustee Meinders's sexual harassment, The Village has performed a series of bad acts towards Plaintiff.

47. The Village's policy making level of government was aware of and noticed its Village Trustee's sexual harassment.

48. By failing to do anything, and in some cases taking negative action purposefully towards Plaintiff, the Village encouraged and/or condoned Village Trustee Meinders's conduct.

49. The Village has enacted a number of ordinances, requiring its Trustees and President to act faithfully in their duties, prohibiting sexual harassment, and prohibiting offering gifts.

50. The Village, through its Trustees and/or President, has violated its own policies.

51. The Village was aware of Village Trustee Meinders's unconstitutional actions towards Plaintiff.

52. The Village made a deliberate choice to approve of Village Trustee Meinders's conduct towards Plaintiff and the basis for such conduct.

53. As a result of Village Trustee Meinders's violations of 42 USC 1983, Plaintiff has suffered actual damages including lost wages, medical expenses, past and future emotional distress, punitive damages, and attorneys fees and costs.

**WHEREFORE**, the Plaintiff prays for a judgment against the Defendant The Village of Shannon, and the following relief:

- (1) a judgment for compensatory damages;
- (2) for a judgment of punitive damages;
- (3) reasonable attorney fees pursuant to 42 U.S.C. §1988 plus costs of this suit;
- (4) and any other such further relief as this Court deems appropriate.

### **Count III – Section 1983 Violation – Free Speech – Butch Meinders**

54. Plaintiff incorporates Paragraphs 1-32, as if set forth in full herein for this Paragraph 54.

55. At times prior to Village Trustee Meinders's sexual harassment of Plaintiff, Plaintiff was a frequent critic of The Village's government and sought to participate in its reform by running for president.

56. Plaintiff had engaged in speech and conduct protected by the First Amendment, raising concerns about The Village's government, policy, and/or other matters of public concern.

57. Village Trustee Meinders's conduct towards Plaintiff was intended to, and in fact did, deprive Plaintiff of her free speech rights under the of the First Amendment of the United States Constitution.

58. In sexually harassing Plaintiff, Village Trustee Meinders was acting under color of state law.

59. At all times hereto, Village Trustee Meinders's conduct toward the Plaintiff was intentional, malicious, wanton and with the reckless disregard for and depraved indifference to the Plaintiff's health and constitutional rights.

60. As a result of Village Trustee Meinders's violations of 42 USC 1983, Plaintiff has suffered actual damages including lost wages, medical expenses, past and future emotional distress, punitive damages, and attorneys fees and costs.

**WHEREFORE**, the Plaintiff prays for a judgment against the Defendant Butch Meinders, and the following relief:

- (1) a judgment for compensatory damages;
- (2) for a judgment of punitive damages;
- (3) reasonable attorney fees pursuant to 42 U.S.C. §1988 plus costs of this suit;
- (4) and any other such further relief as this Court deems appropriate.

#### **Count IV – Section 1983 Violation – Free Speech – The Village**

61. Plaintiff incorporates Paragraphs 54-60, as if set forth in full herein for this Paragraph 61.

62. In her criticism of The Village and its policies, Plaintiff engaged in constitutionally protected speech.

63. Plaintiff's constitutionally protected speech was a motivating factor behind Village Trustee's Meinders's, Village Trustee Ruter's and Village President Shaner's conduct towards Plaintiff.

64. The Village, through Village Trustees Meinders and Ruter and Village President Shaner, would not have taken the actions alleged herein against Plaintiff had Plaintiff not exercised her constitutionally protected free speech rights.

65. The Village retaliated against Plaintiff because she exercised her constitutionally protected free speech rights.

66. The Village has participated in a series of bad acts directly towards Plaintiff.

67. The policy-making level of The Village was aware of its agents' conduct towards Plaintiff

68. By failing to do anything to cease the harassment towards Plaintiff or censuring or otherwise reprimanding Village Trustees Meinders and Ruter and Village President Shaner, The Village encouraged or at least condoned its agents' misconduct directed at Plaintiff.

69. The Village Trustees and Village President have final policy-making authority with regard to its affairs.

70. Plaintiff's constitutional injuries were caused by Village Trustee Meinders and Ruter and Village President Shaner.

71. Through its conduct, The Village deprived Plaintiff of her constitutional right to free speech and/or retaliated against her for exercising her free speech.

72. As a result of The Village's violations of 42 USC 1983, Plaintiff has suffered actual damages including lost wages, medical expenses, past and future emotional distress, punitive damages, and attorneys fees and costs.

**WHEREFORE**, the Plaintiff prays for a judgment against the Defendant The Village of Shannon, and the following relief:

- (1) a judgment for compensatory damages;
- (2) for a judgment of punitive damages;
- (3) reasonable attorney fees pursuant to 42 U.S.C. §1988 plus costs of this suit;
- (4) and any other such further relief as this Court deems appropriate.

/s/James M. Dore

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**PLAINTIFF DEMANDS TRIAL BY JURY**