

IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

KEVIN LINK )  
 )  
Plaintiff, )  
 ) 19-SC-1895  
v. )  
 )  
CITY OF GRANITE CITY, )  
 )  
Defendant. )

**DEFENDANT'S MOTION TO DISMISS**  
**PURSUANT TO 735 ILCS 5/2-619**

Comes now Defendant, CITY OF GRANITE CITY ("The City"), a municipal corporation, by and through its attorneys of the law firm of Unsell, Schattnik, & Phillips, P.C., and for its Motion to Dismiss pursuant to 735 ILCS 5/2-619 states as follows:

**FACTUAL BACKGROUND**

1. On June 7, 2019, Plaintiff filed his first Complaint against City of Granite City, alleging false arrest damages allegedly caused by his arrest on June 12, 2017.
2. On August 28, 2019, this Court dismissed the Plaintiff's Complaint. The Complaint was dismissed without prejudice.
3. On September 18, 2019, Plaintiff filed his Amended Complaint against Defendant City of Granite City.
4. In his Amended Complaint, Plaintiff alleged that on or about June 7, 2016, a Granite City Police officer issued a Madison County Circuit Court Complaint No. 2016OV400378, to

Plaintiff Kevin Link alleging illegal occupancy at 2506 Iowa Street, Granite City, Illinois in violation of City of Granite City Municipal Code 15.08.100.14. See Plaintiff Exhibit K-1.

5. Plaintiff alleged that prior to the issuance of Complaint No. 2016OV400378, Plaintiff and his wife requested that City officials investigate "unknown strangers" trespassing and illegally occupying the 2506 Iowa Street property.

6. On June 21, 2016, a Granite City Municipal Court ordinance violation citation, Citation No. 16000338, was issued to Plaintiff by Granite City Building and Zoning for junk and debris at the 2506 Iowa Street property. See Plaintiff's Exhibit L-1.

7. On or about July 13, 2016, Plaintiff filed a *Pro Se* Motion requesting the Madison County Circuit Court to reschedule the July 14, 2016 appearance date related to the Madison County Circuit Court Complaint No. 2016OV400378. See certified copy of Motion attached hereto and marked as Exhibit 1.

8. On July 14, 2016, presiding Judge Ron Slemmer entered an Order resetting Plaintiff's appearance date to August 25, 2016. See certified copy of the July 14, 2016 Order attached hereto and marked as at Exhibit 2.

9. In his Amended Complaint, Plaintiff alleged he filed for eviction on May 4, 2016, to remove the illegal occupants prior to the issuance of the illegal occupant Madison County

Circuit Court Complaint No. 2016OV400378 by the Granite City Police.

10. Plaintiff alleged he attended Granite City Municipal Court on July 25, 2016. Plaintiff further alleged he spoke with the representative for Granite City Building and Zoning Department, Richard Werths.

11. Plaintiff further alleged that he was told by Granite City officials that both the junk and debris citation, Municipal Court Citation No. 16000338, and the illegal occupancy citation, Madison County Circuit Court Complaint No. 2016ov400348, would be litigated together as a "2-for-1" deal.

12. Plaintiff plead "not guilty" on the Municipal Court citation and provided the Municipal Court hearing officer with a request for dismissal as his defense. See Plaintiff's Exhibit K-2.

13. Plaintiff alleged he was told by Granite City officials "[n]ot to worry, we will take care of it" and was allegedly informed that both citations would be dismissed.

14. The Madison County Circuit Court Citation for illegal occupancy, Citation No. 2016OV400378, was not dismissed. Further, the Granite City Municipal Court has no authority to order the dismissal of a citation issued through the Madison County Circuit Court system.

15. Plaintiff alleged that he did not receive any further

notices about future court appearances and assumed he need not appear in court again on Madison County Circuit Court Complaint No. 2016OV400378.

16. On August 25, 2016, Plaintiff did not appear at the Madison County Circuit Court hearing scheduled for that date. Judge Smith issued a failure-to-appear warrant for Plaintiff setting the warrant bond at \$5,000.00. See certified copy of Order of August 25, 2016 attached as Exhibit 3.

17. Plaintiff's Amended Complaint alleged the \$5,000 bail amount was excessive for his failure-to-appear warrant.

18. Plaintiff's Amended Complaint also alleged he was never told by any Granite City official that a warrant for his arrest had been issued by the Madison County Circuit Court during numerous interactions he had with them during the time period between August 25, 2016 and his arrest on June 12, 2017.

19. On or about June 12, 2017, Plaintiff was arrested by the Granite City Police on the outstanding Failure-to-Appear warrant related to Madison County Circuit Court Complaint No. 2016ov400378 issued on August 25, 2016. Plaintiff was released after his son paid a bond of \$580. See Certified Copy of Bond Form #03560 attached hereto and marked as Exhibit 4.

20. Plaintiff then appeared at the next scheduled hearing on July 13, 2017, where the matter was continued to September 14, 2017. Plaintiff appeared at this setting. Trial was then set in

that matter for September 21, 2017.

21. On September 21, 2017, the ordinance violation ticket was dismissed *Nolle Pros* on the motion of City of Granite City. See certified copy of Order of September 21, 2017 attached hereto and marked as Exhibit 5.

22. On October 4, 2017, Plaintiff's bond was refunded minus the required fees. See printout of Madison County Bond Assignment record attached hereto and marked as Exhibit 6.

23. Plaintiff alleged the City improperly issued the Madison County Circuit Court citation for illegal occupants and improperly issued the Granite City Municipal junk and debris citation, misled Plaintiff about dismissal of the charges, failed to inform him of court dates, improperly had a Circuit Court judge issue a failure-to-appear warrant for his arrest in lieu of a default judgment, arrested Plaintiff one year later pursuant to said arrest warrant, did not refund the bond money paid for his release, and required multiple court dates before receiving a dismissal of the charges against on September 21, 2017.

24. Plaintiff further alleged the improper citations, issuance of the arrest warrant, Plaintiff's subsequent arrest, and other acts were taken in pursuit of an alleged "campaign of targeted harassment" against him by the City due to his protests against a City ordinance.

**MOTION TO DISMISS PURSUANT TO 2-619**  
**STATUTE OF LIMITATIONS**

25. Defendant moves this Court to dismiss Plaintiff's action pursuant to 735 ILCS § 5/2-619(a)(5). Section 2-619(a)(5) allows for involuntary dismissal of an action if "the action was not commenced within the time limited by law." 735 ILCS § 5/2-619(a)(5).

26. Based on the allegations contained in Plaintiff's Amended Complaint, Plaintiff appears to be alleging a claim for malicious prosecution.

27. Plaintiff alleged in his Amended Complaint that (1) the City commenced and continued a prosecution of the illegal occupant citation and junk and debris citations against him; (2) alleged that he received a termination in his favor when all charges were dismissed against him on September 21, 2017; (3) alleged the City lacked cause to issue him the citations; (4) alleged malice on behalf of the City due to an alleged "campaign of targeted harassment" due to his protests against a City ordinance; and (5) claimed damages in the form of the loss of freedom, damage to his reputation, damage to his business, and the loss of monies paid in bond after his arrest.

28. The elements of a cause of action for malicious prosecution are: (1) the commencement or continuance by the defendant of an original judicial proceeding against the plaintiff; (2) termination of the original proceeding in favor of the plaintiff; (3) absence of probable cause for the proceeding;

(4) malice; and (5) special damages. *Grundhoefer v. Sorin*, 2014 IL App (1<sup>st</sup>) 131276 ¶ 11; *Davis v. Temple*, 284 Ill. App.3d 983, 989 (5th Dist. 1996). As such, Plaintiff's allegations most closely resemble these elements of a claim of malicious prosecution, and therefore Defendant will address Plaintiff's claims as a claim for malicious prosecution.

29. Claims for malicious prosecution against local entities or their employees are tort claims subject to the one-year statute of limitations contained in the Local Governmental and Governmental Employees Act ("The Act"), 745 ILCS 10/8-101. *Luciano v. Waubonsee Community College*, 245 Ill.App.3d 1077, 1086-87 (2d Dist. 1993) (The Act's limitations period barred claims of malicious prosecution and false imprisonment); See *Ferguson v. City of Chicago*, 213 Ill.2d 94, 99 (one-year tort immunity statute of limitations applied to a malicious prosecution claim).

30. A cause of action for malicious prosecution does not accrue until the criminal proceeding on which it is based has been terminated in the plaintiff's favor. *Ferguson*, 213 Ill.2d at 99.

31. Plaintiff alleged that the Granite City municipal citation for junk and debris, Municipal Court Citation No. 16000338, was dismissed on June 25, 2017. Further, Plaintiff alleged the Madison County Circuit Court Complaint No.

2016ov400378 for illegal occupancy, was dismissed on September 21, 2017.

31. Moreover, the disposition sheet filed with the Madison County Circuit Court on September 21, 2017, reflects that the Madison County Circuit Court Complaint No. 2016ov400378 for illegal occupancy was dismissed on that date.

32. As the last charges against Plaintiff, which were included in the Madison County Complaint No. 2016ov400378, were dismissed in Plaintiff's favor as of September 21, 2017, Plaintiff's cause of action for malicious prosecution against the City accrued on that date and the one-year limitations period began to run.

33. As such, the statute of limitations for Plaintiff's cause of action for malicious prosecution expired September 21, 2018.

34. Plaintiff's initial Complaint was filed on June 7, 2019.

35. Thus, pursuant to the one-year statute of limitations applicable here, Plaintiff's claim for malicious prosecution is time-barred and prohibited by law.

WHEREFORE, Defendant CITY OF GRANITE CITY respectfully request this Court to dismiss this matter with prejudice pursuant to Section 2-619(a)(5) and for other such relief as this Court deems just and proper.



/s/ Erin M. Phillips

BY: \_\_\_\_\_

Erin M. Phillips #6289723  
Bradley C. Young #6324886  
Unsell, Schattnik & Phillips  
3 South 6<sup>th</sup> Street  
Wood River, IL 62095  
(618) 258-1800  
Erin.phillips7@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2019 I electronically filed this Defendant's Combined Motion to Dismiss with the Clerk of the Court using the Odyssey E-filing system, emailed to the email address below and a paper copy has been mailed to Pro Se Plaintiff Kevin Link at the following address:

Kevin Link  
PO Box 22  
Granite City, Illinois 62040

Currly521@yahoo.com

/s/ Erin M. Phillips  
Erin M. Phillips

TO: CLERK OF CIRCUIT COURT  
RE: CASE NUMBER 2016 OV 400378

**FILED** 12-16

JUL 13 2015

CLERK OF CIRCUIT COURT #65  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

Unfortunately, I Kevin Link will be unavailable for my court appearance on July 14<sup>th</sup>.

**NOTE:**

During the 1<sup>st</sup> week of May 2016,

My wife informed the Granite City inspection department that my tenant at 2506 Iowa had moved out and unknown people had illegally moved in without permission.

I contacted the Captain of Granite City Crime Free Housing in hopes of police assistance in their removal.

I also made a separate request to the Granite City police for assistance on their immediate removal (I was denied any police or city assistance).

I then filed for the eviction of "unknown occupants" on May 4<sup>th</sup> 2016 and was granted re-possession as of June 30<sup>th</sup>. (which I also informed the Granite City inspection department).

**With this in mind, I request either case dismissal or reschedule.**

Sincerely,



Kevin Link  
PO Box #22  
Granite City, IL

IN THE CIRCUIT COURT  
FOR THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

**FILED**

JUN 09 2016

CLERK OF CIRCUIT COURT 88  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

Kevin Link  
Plaintiff,

vs.

Naomi Hudson and  
unknown occupants  
Defendant.

Case No. 16 LM 401

ORDER

This case comes on for hearing pursuant to Notice to the Parties:

- Plaintiff is present;  with counsel pro se
- Defendant is present;  with counsel pro se

The Court sears witnesses, admits exhibits, and hears arguments. After consideration of the evidence and arguments:

THE COURT ORDERS:

- Judgment is granted in favor of the Plaintiff and against the Defendant in the amount \$ 1000.00 plus attorneys fees of \$ 0 court costs of \$ 0
- Judgment is granted in favor of the Defendant and against the Plaintiff, cost of \$ \_\_\_\_\_ assessed.
- Judgment for the premises located at 2506 Lara, Granite City, IL is granted in favor of the Plaintiff.
- Execution by the Sheriff is stayed until June 30, 2016 at 2 an
- Case continued to \_\_\_\_\_
- Notice given to the parties. THIS IS YOUR ONLY NOTICE.

Defendant Exhibit 1  
Page 2 of 4

DATE: 6/9/16

ENTER:



JUDGE

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY

**FILED**  
MAY - 4 2016  
CLERK OF CIRCUIT COURT # 83  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

Kevin Link  
PO Box \*22 Granite City, IL 62040  
Plaintiff

No. 16LM401

vs.  
Naomi Hudson AND UNKNOWN OCCUPANTS  
2506 IOWA, Granite City, IL 62040  
Defendant

**COMPLAINT IN FORCIBLE ENTRY AND DETAINER**

Kevin Link, plaintiff,  
allege that he Kevin Link entitled to possession of the following-described premises, situated in  
the Granite, Madison County, Illinois, to wit: 2506 IOWA  
Granite City, IL 62040

that the defendant UNKNOWN OCCUPANTS unlawfully withhold(s) possession thereof from plaintiff Kevin Link, and furthermore Naomi Hudson  
UNKNOWN OCCUPANTS indebted to said plaintiff for rent of said premises in the sum of \$ 500.

Wherefore, plaintiff Kevin Link pray(s) judgment against the defendant UNKNOWN OCCUPANTS For possession of said described premises,  
and for the sum of \$ 500, and costs of suit.

Dated 5-4-16  
Kevin Link  
(Plaintiff)

**AFFIDAVIT OF RENT DUE**

Kevin Link (Kevin Link)  
being duly sworn, on oath say that he Kevin Link the plaintiff in the  
within cause, that the demand of the plaintiff in said cause is for possession of the said premises and rent therefore  
for the months of April 2016 and  
that the amount due to the said plaintiff from the defendant in said cause after allowing to said defendant all  
just deductions, credits and set offs, if any, is 500 Dollars and 0 Cents.

Signed and sworn to before me

(Clerk of the Circuit Clerk - Notary Public)

Original to Court

Copy to Defendant

Your Copy

Defendant Exhibit 1  
Page 4 of 4



A true copy of the original on file in my office  
Attested to this 12 day of July 2019  
MARK VON NIDA  
Clerk of the Circuit Court, 3rd Judicial Circuit  
Madison County, Illinois  
By ma  
Deputy Clerk

Defendant: LINK KEVIN G

Case # 16OV400378

D.O.B. 19630926 IL

Offense: HOUSING CODE

DL #

CDL: N

9109000 2506 PSW

Attorney

Balance \$0.00

Bond Bal: \$ 0.00

ORDER

Accident:

Defendant fails to appear for 2nd appearance.

Ex-Parte conviction entered. Total fine & cost: \$ \_\_\_\_\_

Reset on appearance docket.

Issue warrant Bond. \_\_\_\_\_

QUASH WARRANT



Defendant appears and is advised of the charges, penalties, rights and trial in absentia.

Defendant pleads not guilty and  Request Jury Trial  Waives Right To Jury Trial

Set for Trial

Defendant's Signature \_\_\_\_\_

CASE STATUS : CSO

**DISPOSITION**

Defendant pleads GUILTY and waives rights and trial  open plea  neg. plea  4 hr Traffic Safety School

Defendant's Signature \_\_\_\_\_

CONVICTION

SUPERVISION \_\_\_\_\_ days \_\_\_\_\_ months \_\_\_\_\_ years

FINES AND COSTS \$ \_\_\_\_\_

FINES AND COSTS \$ \_\_\_\_\_

TOTAL FINES AND COSTS \$ \_\_\_\_\_

TOTAL FINES AND COSTS \$ \_\_\_\_\_

THE OFFENDER SHALL PAY RESTITUTION IN THE AMOUNT OF \$ \_\_\_\_\_ BY \_\_\_\_\_

TO \_\_\_\_\_

Pay Today  From Bond  ROA \_\_\_\_\_

DEF to perform \_\_\_\_\_ hours of public service. Copy to Probation Department.

Transfer remaining bond to \_\_\_\_\_

DEF FOUND NOT GUILTY  DEF FOUND GUILTY  Jury Trial  Bench Trial  In Absentia

NOLLE PROS. motion of  CASE DISMISSED motion of  State  Municipality

Per:  PLEA  INSUFFICIENT EVIDENCE  COMPLIANCE  PROOF OF INS.

ANY OUTSTANDING FINES AND COSTS ARE FOUND TO BE UNCOLLECTIBLE. CLOSE FILE.

TAKE BOND ( BAL. FORFEITED FOR FTA ) CLOSE FILE

FINE & COSTS HAVE BEEN SATISFIED BY PSW. CLOSE FILE

**CONTINUANCES**

CONT motion of  Pros  Deft  Agreement  Court.  Reset NAD 30 days

**DEFENDANT FAILS TO APPEAR / PAY PER ORDER:**

Reset NAD \_\_\_\_\_  ISSUE WARRANT bond \_\_\_\_\_

Revoke Supervision; Conviction Entered; Judgment Unsatisfied; Clerk to Notify SOS. \_\_\_\_\_

Prior order vacated; fee paid/waived.


\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ASSISTANT STATES ATTY [Signature] DEPT / DEFENDANT'S ATTY \_\_\_\_\_

FILED 7/14/2016 MADISON 3rd JUDICIAL CIRCUIT JUDGE [Signature]

Defendant Exhibit 2  
Page 2 of 2



A true copy of the original on file in my office  
Attested to this 12 day of July 2019  
MARK VON NIDA  
Clerk of the Circuit Court, 3rd Judicial Circuit  
Madison County, Illinois  
  
Deputy Clerk

Defendant: LINK KEVIN G

Case # 160V400318

D.O.B. 19630926 IL

Offense: HOUSING CODE

DL # CDL: N

9109000 2506 Iowa

Attorney Balance \$0.00

Bond Bal \$ 0.00

ORDER

Accident:

Defendant fails to appear for 2nd appearance.

Ex Parte conviction entered. Total fine & cost: \$ \_\_\_\_\_

Reset on appearance docket.

Issue warrant Bond \$ 5,000

QUASH WARRANT



Defendant appears and is advised of the charges, penalties, rights and trial in absentia.

Defendant pleads not guilty and  Request Jury Trial  Waives Right To Jury Trial

Set for Trial

Defendant's Signature \_\_\_\_\_

CASE STATUS : CSO

**DISPOSITION**

Defendant pleads GUILTY and waives rights and trial  open plea  neg. plea  4 hr Traffic Safety School

Defendant's Signature \_\_\_\_\_

CONVICTION

SUPERVISION \_\_\_\_\_ days \_\_\_\_\_ months \_\_\_\_\_ years

FINES AND COSTS \$ \_\_\_\_\_

FINES AND COSTS \$ \_\_\_\_\_

TOTAL FINES AND COSTS \$ \_\_\_\_\_

TOTAL FINES AND COSTS \$ \_\_\_\_\_

THE OFFENDER SHALL PAY RESTITUTION IN THE AMOUNT OF \$ \_\_\_\_\_

TO \_\_\_\_\_

**FILED** BY

AUG 25 2016

Pay Today  From Bond  POA \_\_\_\_\_

DEF to perform \_\_\_\_\_ hours of public service. Copy to Probation Department

Transfer remaining bond to \_\_\_\_\_

DEF FOUND NOT GUILTY  DEF FOUND GUILTY  Jury Trial  Bench Trial  In Absentia

NOLLE PROS motion of  CASE DISMISSED motion of  State  Municipality

Per:  PLEA  INSUFFICIENT EVIDENCE  COMPLIANCE  PROOF OF INS.

ANY OUTSTANDING FINES AND COSTS ARE FOUND TO BE UNCOLLECTIBLE. CLOSE FILE.

TAKE BOND ( BAL FORFEITED FOR FTA ) CLOSE FILE.

FINE & COSTS HAVE BEEN SATISFIED BY PSW. CLOSE FILE.

**CONTINUANCES**

CONT motion of  Pros  Deft  Agreement  Court  Reset NAD \_\_\_\_\_

**DEFENDANT FAILS TO APPEAR / PAY PER ORDER:**

Reset NAD \_\_\_\_\_  ISSUE WARRANT bond \_\_\_\_\_

Revoke Supervision; Conviction Entered; Judgment Unsatisfied; Clerk to Notify SOS: \_\_\_\_\_

Prior order vacated; fee paid/waived.

ASSISTANT STATE'S ATTY *[Signature]*

DEPT / DEFENDANT'S ATTY \_\_\_\_\_

FILED 8/18/2016 MADISON 3rd JUDICIAL CIRCUIT

JUDGE *[Signature]*



Defendant Exhibit 3  
Page 2 of 2



A true copy of the original on file in my office  
Attested to this 12 day of JUN 2019  
MARK VON NIDA  
Clerk of the Circuit Court, 3rd Judicial Circuit  
Madison County, Illinois  
By [Signature]  
Deputy Clerk

**IN THE CIRCUIT COURT OF MADISON COUNTY, ILLINOIS**  
 Mark Von Nida, Clerk of the Circuit Court      Edwardsville, Madison County, Illinois

<b>BAIL BOND</b>	ORIGIN OF BOND	<input checked="" type="checkbox"/> Municipality <u>GRANITE CITY</u> <input type="checkbox"/> Sheriff <input type="checkbox"/> State Agency <input type="checkbox"/> Circuit Clerk	BAIL	Warrant or Citation Nbr.
# <u>03560</u>			<input checked="" type="checkbox"/> By Judge \$ <u>5000.00</u> <input type="checkbox"/> By Supreme Court \$ _____	<u>1600400378</u>

Name <u>LINK KEVIN G</u> (Last) (First) (Middle)	SEX: M <input checked="" type="checkbox"/> F <input type="checkbox"/>
Address <u>35 DUBLIN DR</u> Number & Street: <u>GRANITE CITY, IL 62040</u> City & State      Zip	OPERATORS LICENSE NUMBER (IF NONE, STATE NONE) NUMBER: <u>LS20-5076-3274</u> STATE: <u>IL</u>

OFFENSE: (Enter court file number and the related one charge for which highest bail is required.)  
1600400378      FTA / Housing Code  
 Court File Number      Related Charge

TYPE OF BAIL POSTED	Supreme Court Rule - License <input type="checkbox"/> and/or Cash <input type="checkbox"/> ..... (\$ _____)	<b>FILED</b> JUN 12 2017
	Cash Deposit - (Full) ..... (\$ _____)	
	<input checked="" type="checkbox"/> Cash Deposit - (10%) ..... (\$ <u>500.00</u> )	
	Real Estate - (Two Times Bail Amount) ..... (\$ <u>700.00</u> )	
	Recognizance Bond ..... (\$ <u>580.00</u> )	
Appeal Bond ..... (\$ _____)		

IMPORTANT: ALL CASH MUST BE DEPOSITED WITH THE CLERK OF THE CIRCUIT COURT, MARK VON NIDA, WITHIN 48 HOURS.

**- Notice to Person Posting Bond -**  
Defendant may assign bond to an attorney  
without your consent prior to any refund to you.

In addition to the Special Conditions of this Bond imposed above, the General Bond Conditions (725 ILCS 5/110) on the reverse side are made a part hereof.

Judges Signature \_\_\_\_\_

I WILL APPEAR IN COURT ON THE 13TH DAY OF JULY, 2017, AT THE HOUR OF 9:00 A.M.  
 IN COURTROOM NO. 6B AT 200 EDISON AVE

**NOTICE TO PERSON PROVIDING BAIL FOR THE DEFENDANT**  
 I hereby state that I have posted bail for the defendant named above, and that I understand that if the defendant fails to comply with the conditions of this bail bond, that the Court shall enter an order declaring this bail to be forfeited and used to pay costs, attorney's fees, fines or other purposes authorized by the Court. I further state that I understand that even though the defendant complies with the conditions of this bail bond, if an order for a fine and/or court costs is entered against the defendant this bail money may be used to pay the fine, court costs and bail bond costs.

Signature: X Shawn G Link  
 Name: SHAWN G LINK (Print)  
 Address: 35 DUBLIN DR  
 City, State and Zip: GRANITE CITY, IL 62040  
 Telephone No.: 618 581-9930  
 Issued on: 6/10/17

**CERTIFICATE OF DEFENDANT**  
 I, the Defendant named above, do hereby state that I know and understand the terms and conditions of this bail bond as shown on the FRONT AND REVERSE SIDES of this bail bond form. I understand further that if at any time prior to the final disposition of the charge(s) I escape or am released on bond and fail to appear in court when required by the court, the result of my failure to appear will be as follows: I thereby waive my right to confront the witnesses against me; the trial can proceed in my absence; I forfeit the security money posted; judgment will be entered against me for the full amount of this bond, plus costs; a warrant may be issued, in which event additional bond money may be required. I understand and accept the terms and conditions set forth above and on the reverse side of this bail bond.

Signature of Defendant: K Link  
 Address: 35 DUBLIN DR  
 City, State, Zip: GRANITE CITY, IL  
 Telephone No.: 931 02491

Signed before me and security received.  
Shawn G Link      Shawn G Link  
 Judge      Peace Officer      Circuit Clerk

Police Dept. GRANITE CITY

**ASSIGNMENT OF BAIL BOND BY THE DEFENDANT**  
 I hereby authorize the return of the monies posted above to the person shown on this bail bond as having provided monies for my bail after all conditions of this bail bond have been met.

Signature of Defendant: \_\_\_\_\_

WHITE - CIRCUIT CLERK      PINK - DEFENDANT'S COPY



Defendant Exhibit 4  
Page 2 of 2



A true copy of the original on file in my office  
Attested to this 12 day of July 2019

MARK VON NIDA

Clerk of the Circuit Court, 3rd Judicial Circuit  
Madison County, Illinois

By [Signature]  
Deputy Clerk

Defendant: LINK KEVIN G  
D.O.B. 19630926 IL GRANITE CITY, CITY OF  
DL # CDL: N  
Attorney  
Balance \$0.00 Bond Bal \$ 505.00

Case # 16OV400378  
Offense: HOUSING CODE  
9109000  
Accident:

ORDER

- Defendant fails to appear for 2nd appearance.
  - Ex Parte conviction entered. Total fine & cost: \$ \_\_\_\_\_
  - Reset on appearance docket.
  - Issue warrant Bond \_\_\_\_\_
  - QUASH WARRANT
- Defendant appears and is advised of the charges, penalties, rights and trial in absentia.
- Defendant pleads not guilty and  Request Jury Trial  Waives Right To Jury Trial  Set for Trial

Defendant's Signature \_\_\_\_\_

CASE STATUS : CSO

DISPOSITION

- Defendant pleads GUILTY and waives rights and trial  open plea  neg. plea  4 hr Traffic Safety School

Defendant's Signature \_\_\_\_\_

- CONVICTION  SUPERVISION \_\_\_\_\_ days \_\_\_\_\_ months \_\_\_\_\_ years

FINES AND COSTS \$ \_\_\_\_\_ FINES AND COSTS \$ \_\_\_\_\_

TOTAL FINES AND COSTS \$ \_\_\_\_\_ TOTAL FINES AND COSTS \$ \_\_\_\_\_

THE OFFENDER SHALL PAY RESTITUTION IN THE AMOUNT OF \$ \_\_\_\_\_ BY \_\_\_\_\_

TO \_\_\_\_\_

- Pay Today  From Bond  POA \_\_\_\_\_

- DEF to perform \_\_\_\_\_ hours of public service. Copy to Probation Department.

- Transfer remaining bond to \_\_\_\_\_

- DEF FOUND NOT GUILTY  DEF FOUND GUILTY  Jury Trial  Bench Trial  In Absentia

- NOLLE PROS motion of  CASE DISMISSED motion of  State  Municipality

Per:  PLEA  INSUFFICIENT EVIDENCE  COMPLIANCE  PROOF OF INS.

- ANY OUTSTANDING FINES AND COSTS ARE FOUND TO BE UNCOLLECTIBLE. CLOSE FILE.

- TAKE BOND ( BAL FORFEITED FOR FTA ) CLOSE FILE

- FINE & COSTS HAVE BEEN SATISFIED BY PSW. CLOSE FILE

CONTINUANCES

CONT motion of  Pros  Deft  Agreement  Court  Reset NAD \_\_\_\_\_

DEFENDANT FAILS TO APPEAR / PAY PER ORDER:

- Reset NAD \_\_\_\_\_  ISSUE WARRANT bond \_\_\_\_\_
- Revoke Supervision; Conviction Entered; Judgment Unsatisfied; Clerk to Notify SOS. \_\_\_\_\_
- Prior order vacated; fee paid/waived.

~~7/13 - provided to court by A~~

ASSISTANT STATE'S ATTY [Signature]

DEFT / DEFENDANT'S ATTY \_\_\_\_\_

FILED 9/21/2017 MADISON 3rd JUDICIAL CIRCUIT

JUDGE [Signature]

Defendant Exhibit 5  
Page 2 of 2



A true copy of the original on file in my office  
Attested to this 12 day of MAY 2019  
**MARK VON NIDA**  
Clerk of the Circuit Court, 3rd Judicial Circuit  
Madison County, Illinois  
By *[Signature]*  
Deputy Clerk

C I E R I C T S M A G N U S  
 MARK YON NIDA, CLINIC CLERK  
 MADISON COUNTY  
 155 N. MAIN ST, SUITE 120

Case Number: 16-01-400378 From: 01/00 To: 99/99

Obligor: KEVIN G LINK  
 35 DOWLINE DR  
 GRANITE CITY, IL 62040

Case History Audit Listing

Receipt Number	Payor Name	Payor Date	Payor Chk-Number	Input Date	Check Number	Check Date	Check Acct Number	Receipt Amount	Support Amount	Attrails Amount	Control Amount	Other Amount	Clark IDPA Amt	Trans Typ	Opt Account-Description	Payee Name
35638375	KEVIN G LINK	6/13	CASH	2017	228506	7/10	5000	505.00				505.00		PMT	SER BOND ORIGINAL	MADISON COUNTY TRE
35638382	KEVIN G LINK	6/13	CASH	6/13	228512	7/10	5576	5.00				5.00		PMT	SER COOHY TRA	MADISON COUNTY TRE
36111301	KEVIN G LINK	9/14	CASH	9/14	230097	10/06	5300	79.00				70.00		PMT	SER PTA WARRANT FINE	GRANITE CITY TREAS
36197536	KEVIN G LINK	10/04	BOND	10/04	230097	10/06	5300	2.00				2.00		PMT	SER COPIES (FRTG FATES)	MADISON COUNTY TRE
36197536	KEVIN G LINK	10/04	BOND	10/04	230701	11/08	5400	5.00				5.00		PMT	SER COPIES (FRTG FATES)	MADISON COUNTY TRE
36197536	KEVIN G LINK	10/04	BOND	10/04	230060	10/05	5900	455.00				50.00		BND	SER BOND 10Y CHARGES	MADISON COUNTY TRE
						2017 Year Total	1092.00	1092.00				1092.00				LINK KEVIN G
						Docket Total	1092.00	1092.00				1092.00				
						Report Total	1092.00	1092.00				1092.00				

Total Record Count 9

10/5/17