

3. Plaintiff attended court on July 25, 2016, at the Granite City courthouse, room 6B, and met with Granite City representative RICHARD WORTHS (the name of whom is to the Plaintiff's best recollection)
4. The City representative stated to Plaintiff that he had two (2) outstanding ordinance violations concerning his property at 2506 Iowa, Granite City, including “one for allowing individuals in the property not identified in an occupancy permit, and another for the occupant's trash.”
5. The City representative stated to Plaintiff that he would give Plaintiff “a 2-for-1 deal” and that both violations would be litigated together.
6. Plaintiff entered a plea of not guilty to both citations, and provided the City representative and hearing officer a copy of his filed request for dismissal, a copy of which is attached and made a part of this complaint as **Exhibit K-2**.
7. The City representative consulted with the Granite City crime-free police officer in attendance and the hearing officer on duty, and Plaintiff was then informed that both ordinance violation tickets would be dismissed.

8. Plaintiff then inquired about the next schedule appearance, or any other future actions regarding the ordinance violations, and the Granite City crime-free police officer stated to Plaintiff “Do not worry, we (Granite City) will take care of it.

9. While the City of Granite did dismiss ticket **16000338** as agreed, unbeknownst to this Plaintiff the City neglected to dismiss ticket **2016ov400378**, which would later result in this Plaintiff's false arrest.

10. Subsequent to his court appearance on July 25th, 2016 Kevin Link received no further notices concerning either ticket and thus had no reason to believe that both tickets had not been dismissed as agreed.

11. Apparently there was a future court date set for August 25, 2016, as to ticket **2016ov400378** which Plaintiff did not attend as Plaintiff believed all matters were resolved at the July 25, 2016 court appearance.

12. A warrant was issued on August 25th, 2016, for the arrest of Plaintiff KEVIN LINK due to the “failure to appear” caused by the City of Granite's act of misinforming Kevin Link and failing to dismiss ov378 as agreed at the July 25th, 2016 hearing.

13. Despite numerous interactions with the City of Granite after the issuance of that arrest warrant, including the renewal of his 2017 Granite City business license for 2506 Iowa, Kevin Link was never informed of any outstanding ordinance violation or arrest warrant.
14. Plaintiff KEVIN LINK only learned of the arrest warrant approximately a year after its issuance, when he was arrested on June 10th, 2017 while reporting a crime to Granite City police that had occurred at one of his Granite City business properties.
15. After his arrest, Kevin Link appeared in court for the second time concerning ov378 on July 13th, 2017, where again he plead not guilty to City attorney Ryan Robertson. Kevin Link then requested either the full return of the \$600 paid to bail him (Kevin Link) out of jail, or a trial before a Judge. City attorney Ryan Robertson declined to return the \$600, however he did verbally agree to Kevin Link's request for a trial before a Judge.
16. Kevin Link appeared in court a third time on August 17th, 2017 for his scheduled trial. City attorney Ryan Robertson stated that a witness for the City was on “vacation” and the trial would therefore be postponed.

17. Kevin Link appeared in court a *fourth* time on September 21st, 2017 expecting his scheduled trial before a Judge, yet he still was not allowed to appear before a Judge. Instead Granite City attorney Ryan Robertson informed Kevin Link that the City of Granite had already dismissed the case and Kevin Link would “not be getting a trial”.
18. Plaintiff has made known to Granite City officials his refusal to comply with directives to evict tenant's pursuant to the Crime-Free Housing Act of Granite City, where those tenants had not yet been convicted of criminal activity, and continues in active refusal. Plaintiff is currently involved in other court actions regarding this matter.
19. The false arrest resulting from citation **2016ov400378** was simply the latest of many acts in Granite City's ongoing campaign of targeted harassment against Plaintiff KEVIN LINK and his business due to Plaintiff's protesting of the enforcement of the City's ordinance known as “Crime-Free Housing”.
20. The arrest warrant was improperly issued, among other reasons, because in contradiction of standard procedure it was issued prematurely before the issuance of a default judgment.
21. The \$5,000 arrest bond was excessive for a mere missed court date in a civil ordinance case where Kevin Link had already submitted pleadings of not guilty along with sufficient evidence to exonerate him of the charges.

22. This claim is not only for the costs incurred, but also for damages caused to Plaintiff KEVIN LINK, who should be appropriately compensated for the unjust taking of his freedom, unjust damages to his lawful business, unjust damage to his public reputation through a “crime” all-but fabricated by Granite City, and all other damages and relief this court deems equitable.

WHEREFORE, Plaintiff KEVIN LINK prays this court enter judgment in his favor and against the Defendant, City of Granite, in the amount of \$10,000.00, or as the evidence permits, and such other and further relief as the court deems just and equitable.

Respectfully Submitted,

Plaintiff KEVIN LINK
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