

**IN THE CIRCUIT COURT
THIRD JUDICIAL DISTRICT
MADISON COUNTY, ILLINOIS**

**KEVIN LINK, individually and on behalf of
others similarly situated,**)
)
)
Plaintiff,)
)
v.)
)
CITY OF GRANITE CITY,)
)
Defendant.)

2023LA001092

Case No.

COMPLAINT

Comes now Plaintiff Kevin G. Link, by and through his attorneys, Thomas G. Maag and the Maag Law Firm, LLC, and states as follows:

1. At all times relevant, Plaintiff Kevin G. Link is a citizen and resident of Madison County.
2. At all times relevant, Defendant City of Granite City is a municipal corporation located within Madison County.
3. That at some point in the past, unknown to Plaintiff, Defendant Granite City issued a citation, number 23000319, for an alleged inoperative vehicle on property located at 2474 Iowa Street.
4. That at all times relevant:

“Except as provided in Section 1-2-9.1 of this Act, in all actions for the violation of any municipal ordinance, the first process shall be a summons or a warrant. A warrant for the arrest of an accused person may issue upon the affidavit of any person that an ordinance has been violated, and that the person making the complaint has reasonable grounds to believe that the party charged is guilty thereof. Every person arrested upon a

Wherefore, Plaintiff and the Plaintiff class Humbly request that this Honorable Court enter judgment in Plaintiffs favor, and against Defendants City of Granite City, in an amount in excess of \$50,000.00, due to lack of required lawful notice, plus costs of suit, and attorney fees, that this Court certify the foregoing class, appointing Kevin Link as class representative, and Thomas G. Maag and Peter J. Maag and the Maag Law Firm, LLC, a class counsel, plus an award of attorney fees and costs (under the Illinois Civil Rights Act of 2003, as well as other law), and such other, further and different relief as is allowed by law.

Dated: 8-5-2023

Kevin Link

By: s/Thomas G. Maag

Thomas G. Maag #6272640
Peter J. Maag #6286765
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095

Phone: 618-216-5291
tmaag@maaglaw.com
maag@maaglawfirm.com

AFFIDAVIT OF CASE VALUE

The undersigned hereby certifies that the foregoing case has a value reasonably in excess of \$50000.00

Dated: 8-5-2023

s/Thomas G. Maag