

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

MARY J. JONES, LINDA BALLENTINE,  
SYDELL F. HATCHETT, LAVERNE  
WALKER, BERNICE MOORE, BARBARA  
LOMAX, SAMANTHA NEEROSE, WYLENE  
L. FLOWERS, ARLENE WILLIAMS, GLORIA  
E. HIGGINS, WILLIE B. WILLIAMS,  
MARQUETTE DUNN, EMMA G. HOLMES,  
LAGRETTA GREEN, AMERICAN  
FEDERATION OF STATE, COUNTY AND  
MUNICIPAL EMPLOYEES COUNCIL 31,  
CHICAGO TEACHERS UNION LOCAL 1,  
IFT-AFT, TEAMSTERS LOCAL 700 and  
ILLINOIS NURSES ASSOCIATION,

Plaintiffs,

v.

MUNICIPAL EMPLOYEES' ANNUITY AND  
BENEFIT FUND OF CHICAGO and BOARD  
OF TRUSTEES OF THE MUNICIPAL  
EMPLOYEES' ANNUITY AND BENEFIT  
FUND OF CHICAGO,

Defendants.

Case No. \_\_\_\_\_

2014CH20027  
CALENDAR/ROOM 07  
TIME 00:00  
Declaratory Jdnt

FILED  
2014 DEC 16 AM 9:06  
CLERK OF COURT  
OF COOK COUNTY  
CHANCERY DIV.  
JUDICIAL BRANCH OFFICE

**COMPLAINT FOR DECLARATORY, INJUNCTIVE AND OTHER RELIEF**

Plaintiffs Mary J. Jones, Linda Ballentine, Sydell F. Hatchett, Laverne Walker, Bernice Moore, Barbara Lomax, Samantha Neerose, Wylene L. Flowers, Arlene Williams, Gloris E. Higgins, Willie B. Williams, Marquette Dunn, Emma G. Holmes, LaGretta Green, American Federation of State, County and Municipal Employees Council 31 ("AFSCME"), Chicago Teachers Union Local 1, IFT-AFT ("CTU"), Teamsters Local 700 ("Teamsters") and Illinois Nurses Association ("INA") for their Complaint against Defendants Municipal Employees' Annuity and Benefit Fund of Chicago ("MEABF") and the Board of Trustees of the MEABF ("MEABF Board") state as follows:

## NATURE OF THE ACTION

1. The individually-named Plaintiffs bring this action to protect their constitutional right to the pension benefits they and all other members of the MEABF were promised when they chose a public-service career. In violation of the Pension Protection Clause of the Illinois Constitution, Public Act 98-0641, scheduled to go into effective on January 1, 2015, diminishes and impairs the pension benefits of Plaintiffs and all other MEABF members. AFSCME, CTU, Teamsters and INA, each of which have members who are MEABF participants, join in this lawsuit to protect the retirement security of their respective members who participate in the MEABF. Unless this Court strikes down and enjoins implementation of the Act, Plaintiffs and thousands of other current and retired City of Chicago and Chicago Board of Education employees will be harmed and the trust that all Illinois citizens place in the inviolability of their Constitution will be breached.

2. In 1970, Illinois made a straightforward promise that the pension benefits a public employee receives as a result of the employee's membership in a public pension or retirement system – such as the MEABF – cannot be diminished or impaired. Specifically, the Illinois Constitution states:

Membership in any pension or retirement system of the State, any unit of local government or school district, or any agency or instrumentality thereof, shall be an enforceable contractual relationship, the benefits of which shall not be diminished or impaired.

(Ill. Const. 1970, art. XIII, § 5) (the “Pension Protection Clause”).

3. The individual Plaintiffs, like the other members of the MEABF, have upheld their end of that constitutionally-protected bargain. Those who currently are in the employ of the City of Chicago or the Chicago Board of Education teach our children, serve in libraries, make Chicago airports safe, fix our roads, collect our garbage, care for the ill, and perform myriad

other essential services for the City of Chicago and its citizens. Those who already have retired similarly dedicated their careers to the men, women and children of the City of Chicago. Each faithfully has contributed to the MEABF the substantial portion of their paychecks the Illinois Pension Code requires.

4. In stark contrast, for years the City of Chicago contributed to the MEABF only those amounts the Illinois General Assembly directed by statute. These amounts were systematically less than actuarial reports provided by the MEABF indicated were needed to meet future pension benefit obligations. The pension funds were treated, essentially, as a piggy bank used to finance other things. But rather than take responsibility for this deliberate underfunding, the elected officials responsible for passage of Public Act 98-0641 would place squarely the purported remedy for this problem on the backs of the individual Plaintiffs and the other members of the MEABF.

5. Specifically, for those members of the MEABF who already have retired, Public Act 98-0641 unlawfully reduces the amount of the automatic annuity increases to which they otherwise are entitled under the version of the Pension Code in effect prior to implementation of Public Act 98-0641. And, for those members of the MEABF who currently are in the employ of the City of Chicago or the Board of Education, Public Act 98-0641 requires them to contribute more of their salaries toward their pensions only to suffer when they retire the injustice of the same reduced automatic annuity increases that current retirees will suffer immediately.

6. Those are the very diminishment and impairments of pension benefits that the Pension Protection Clause forbids.

7. Plaintiffs bring this action to defend their constitutionally-protected rights and request that the Court declare the entirety of Public Act 98-0641 unconstitutional, void and unenforceable and enjoin the Defendants from implementing the Act.

### **JURISDICTION AND VENUE**

8. The Court has subject matter jurisdiction over this matter which challenges Public Act 98-0641, a law of the State of Illinois, as unconstitutional.

9. The Court has personal jurisdiction over each Defendant. Pursuant to 735 ILCS 5/2-209(a)(1), the MEABF and the MEABF Board are subject to this Court's personal jurisdiction because this lawsuit arises from each Defendant's transaction of business in Illinois. The MEABF and the MEABF Board also are subject to this Court's personal jurisdiction pursuant to 735 ILCS 5/2-209(a)(7) because this lawsuit arises from the Defendants' breach of the enforceable contractual relationship with each Plaintiff that the Illinois Pension Code creates and the Pension Protection Clause protects absolutely.

10. Venue is proper in this judicial district pursuant to 735 ILCS 5/2-101 because the MEABF and the MEABF Board are established pursuant to the Illinois Pension Code, have their principal place of business located in Cook County and have members within Cook County. Further, the impact of the unlawful conduct this Complaint challenges will occur within this judicial district and throughout Illinois.

### **PARTIES**

#### **INDIVIDUAL PLAINTIFFS**

11. Plaintiff Mary J. Jones worked at the Chicago Public Library, where she served over the course of her career as a clerk and data entry operator, among other positions. Jones is a

member of the MEABF and resides in Chicago. In retirement, Jones' MEABF pension is the sole source of her retirement security.

12. Plaintiff Linda Ballentine worked at the Chicago Department of Health, where she served over the course of her career as a clerk, among other positions. Ballentine is a member of the MEABF and resides in Chicago. In retirement, Ballentine's MEABF pension is the primary source of her retirement security.

13. Plaintiff Sydell F. Hatchett worked at the Chicago Public Library, where she served over the course of her career as a clerk. Hatchett is a member of MEABF and resides in Chicago. In retirement, Hatchett's MEABF pension is the primary source of her retirement security.

14. Plaintiff Laverne Walker worked at the Chicago Department of Health, where she served over the course of her career as a medical interviewer, clerk, and personnel assistant, among other positions. Walker is a member of the MEABF and resides in Chicago. In retirement, Walker's MEABF pension is the primary source of her retirement security.

15. Plaintiff Bernice Moore worked at the Chicago Police Department, where she served as a clerk. Moore is a member of the MEABF and resides in Chicago. In retirement, Moore's MEABF pension is the sole source of her retirement security.

16. Plaintiff Barbara Lomax worked at the Chicago Department of Transportation, where she served as an administrative assistant. Lomax is a member of the MEABF and resides in Chicago. In retirement, Lomax's MEABF pension is the sole source of her retirement security.

17. Plaintiff Samantha Neerose works at the Chicago Public Library, where she is a clerk. Neerose is a member of MEABF and resides in Chicago. Neerose anticipates that upon retirement her MEABF pension will be the primary source of her retirement security.

18. Plaintiff Wylene L. Flowers worked for the Chicago Board of Education, where she served as an instructor assistant in the Chicago public school system. Flowers is a member of the MEABF and resides in Chicago. In retirement, Flowers' MEABF pension is a primary source of her retirement security.

19. Plaintiff Arlene Williams worked for the Chicago Board of Education, where she served as a speech therapist assistant in the Chicago public school system. Williams is a member of the MEABF and resides in Chicago. In retirement, Williams' MEABF pension is the sole source of her retirement security.

20. Plaintiff Gloria E. Higgins works for the Chicago Board of Education, where she serves as a teacher's assistant in the Chicago public school system. Higgins is a member of the MEABF and resides in Chicago. Higgins anticipates that upon retirement her MEABF pension will be her primary source of retirement security.

21. Plaintiff Willie B. Williams works for the City of Chicago Department of Transportation, where he serves as a truck driver. Williams is a member of the MEABF and resides in Chicago. Williams anticipates that upon retirement his MEABF pension will be a primary source of his retirement security.

22. Plaintiff Marquette Dunn works for the City of Chicago Department of Aviation, where he serves as truck driver. Dunn is a member of the MEABF and resides in Chicago. Dunn anticipates that upon retirement his MEABF pension will be a primary source of his retirement security.

23. Plaintiff Emma G. Holmes works as a Public Health Nurse II for the Chicago Department of Public Health. Holmes is a member of MEABF and resides in Chicago. Holmes anticipates that upon retirement her MEABF pension will be the primary source of her retirement security.

24. Plaintiff LaGretta Green worked at the Chicago Department of Public Health, where she served over the course of most of her career as a Nurse Practitioner. Green is a member of the MEABF and resides in Lansing, Illinois. In retirement, Green's MEABF pension is the primary source of her retirement security.

#### **ASSOCIATIONAL LABOR UNION PLAINTIFFS**

25. Plaintiff American Federation of State, County and Municipal Employees Council 31 is a labor union that represents public-service employee members. AFSCME members are participants in the MEABF. Those members' pension rights and benefits are diminished and impaired under Public Act 98-0641. AFSCME's headquarters is located at 205 N. Michigan Avenue, Suite 2100, Chicago, Illinois 60601.

26. Plaintiff Chicago Teachers Union Local 1, IFT-AFT, is a labor union that represents teachers and educational support personnel working in the Chicago Public Schools. CTU members are participants in the MEABF. Those members' pension rights and benefits are diminished and impaired under Public Act 98-0641. CTU's headquarters is located at 222 Merchandise Mart Plaza, Suite 400, Chicago, Illinois 60654.

27. Plaintiff Teamsters Local 700 is a labor union that represents public-service employee members. Teamsters members are participants in the MEABF. Those members' pension rights and benefits are diminished and impaired under Public Act 98-0641. Teamsters' headquarters is located at 1300 W. Higgins Road, Suite 301, Park Ridge, Illinois 60068.

28. Plaintiff Illinois Nurses Association is a labor union that represents nurses who work for the City of Chicago. INA members are participants in the MEABF. Those members' pension rights and benefits are diminished and impaired under Public Act 98-0641. INA's headquarters is located at 105 W. Adams Street, Suite 1420, Chicago, Illinois 60603.

29. The labor union plaintiffs have associational standing to represent the interests of members of their respective unions whose pension benefits are diminished and impaired under Public Act 98-0641, regardless of whether those members are active employees or retired, or whether they are individually named in this Complaint.

#### **DEFENDANTS**

30. Defendant Municipal Employees' Annuity and Benefit Fund of Chicago is a statutorily-created public pension fund that provides retirement annuities and other benefits to employees of the City of Chicago and the Chicago Board of Education. The MEABF is established by Article 8 of the Illinois Pension Code, 40 ILCS 5/8-101 *et seq.* The MEABF's headquarters is located at 321 North Clark Street, Suite 1300 Chicago, Illinois 60654.

31. Defendant Board of Trustees of MEABF administers the MEABF. *See* 40 ILCS 5/8-197. The MEABF Board maintains its office at the MEABF's headquarters, located at 321 North Clark Street, Suite 1300 Chicago, Illinois 60654. Plaintiffs bring this action against the MEABF Board in its official capacity as the administrator of the MEABF.

#### **ILLINOIS SUPREME COURT RULE 19**

32. Plaintiffs challenge the constitutionality of provisions of the Illinois Pension Code, as amended by Public Act 98-0641. Accordingly, Plaintiffs will provide notice of this complaint to the State of Illinois pursuant Illinois Supreme Court Rule 19.

#### **FACTUAL BACKGROUND**



33. Although this litigation involves the unconstitutionality of Public Act 98-0641, its underpinnings involve much more than a legal question. At base, this case concerns an ethical and moral promise to provide a certain level of retirement security for the women and men who chose public service. For many of these individuals, their pensions comprise their life savings and are all that stands between them and poverty. The City of Chicago does not participate in Social Security, and as a result most City retirees receive no Social Security benefits from their City employment.

34. In 1970, the delegates to the Illinois Constitutional Convention recognized this reality and took action to assure the retirement security of public workers. They adopted, and the citizens of Illinois ratified, the Pension Protection Clause in order to ameliorate concern that pension system funding issues might lead either to the diminishment and impairment of public pension benefits or to their elimination altogether.

35. The Pension Protection Clause protects pension benefits, which protections include the criteria used to determine eligibility for a pension and the method by which a pension fund member's initial pension amount and subsequent yearly automatic annuity increases are calculated:

Membership in any pension or retirement system of the State, any unit of local government or school district, or any agency or instrumentality thereof, shall be an enforceable contractual relationship, the benefits of which shall not be diminished or impaired.

(Ill. Const. 1970, art. XIII, § 5.) A public employee's right to pension benefits, including the amount of pension, vests on the employee's first day of membership in a public retirement system, which is the first day on the job.

36. Pursuant to the Pension Protection Clause, a pension fund member's pension benefits are guaranteed. Those benefits cannot unilaterally be diminished or impaired by legislation or otherwise, no matter the circumstance.

**PUBLIC ACT 98-0641 UNLAWFULLY DIMINISHES PENSION BENEFITS FOR**

37. The pension benefits that Plaintiffs receive or will receive upon retirement, as participants in the MEABF, are defined benefits. That is, the pension amount that a member receives is specified by formula set forth in Illinois' Pension Code.

38. Despite the constitutional mandate against diminishment and impairment of pension benefits, Public Act 98-0641 imposes several unlawful changes to the formulas used to calculate pension amounts and contributions toward pensions. Each change impairs and diminishes the pension benefits that each individual Plaintiff, as well as all other members of the MEABF, otherwise would receive under the Pension Code had either the members of the General Assembly or the Governor chosen to uphold their oaths to uphold the Illinois Constitution.

**A. PUBLIC ACT 98-0641 REDUCES THE AAI**

39. Presently, the Pension Code provides participants in the MEABF a 3% automatic annuity increase ("AAI"), compounded, each year. (*See* 40 ILCS 5/8-137; 5/8-137.1, prior to Public Act 98-0641.) The 3% AAI is effective each January 1, and the new amount serves as the base for the subsequent year's AAI. (*See id.*) For example, if a pension system member's gross annuity in 2014 is \$34,000, the first AAI will be \$1,020 ( $\$34,000 \times .03$ ) for a total annuity in 2015 of \$35,020. Thereafter, the \$35,020 would serve as the base annuity amount for calculating the next 3% AAI (*e.g.*,  $\$35,020 \times .03 = \$1,050.60$ ), and the member's annuity amount in 2016 would be \$36,070.60.

40. Upon implementation, Public Act 98-0641 diminishes and impairs pension benefits of current and future retirees in the MEABF because the Act reduces the AAI they will receive. Beginning on January 1, 2015, each AAI will be calculated in an amount equal to the lesser of 3% interest or half the annual unadjusted percentage increase (but not less than zero) in the Consumer Price Index – Urban (CPI-U), simple interest. (See Public Act 98-0641 amendments to 40 ILCS 5/8-137(b-5)(3); 5/8-137.1(b-5)(2)).

41. Recently, the MEABF announced that in 2015, annuitants who receive a pension of \$22,000 or more annually will receive only a .85% AAI based on their 2014 gross pension amount. (See [www.meabf.org](http://www.meabf.org).) As a result, if a MEABF member's gross annuity in 2014 is \$34,000, the first AAI will be \$289 ( $\$34,000 \times .0085$ ) for a total annuity in 2015 of \$34,289. Thereafter, assuming that the AAI for 2016 remains at .85%, the pension system member will receive a total pension in 2016 of \$34,578 (*e.g.*,  $\$34,000$  (2014 gross pension amount)  $\times .0085 = \$289$ ;  $\$289 + \$34,289$  (gross pension amount in 2015) = \$34,578). In other words, under Public Act 98-0641, in the first two years alone a pension system member with a gross pension amount of \$34,000 in 2014 would lose \$2,223.60 (\$731 in 2015 and \$1,492.60 in 2016).

**B. PUBLIC ACT 98-0641 REQUIRES MEABF MEMBERS TO SKIP AUTOMATIC ANNUITY INCREASES**

42. In addition to reducing the amount of AAI a retired MEABF member receives each year, Public Act 98-0641 also diminishes and impairs pension benefits of MEABF members by requiring them to forgo an AAI altogether in certain years, save for retirees who receive a pension benefit that is less than \$22,000 a year:

- a. current retirees must forgo an AAI in 2017, 2019 and 2025 (*see* Public Act 98-0641 amendments to 40 ILCS 5/8-137(b-5)(2); 5/8-137.1(b-5)(1));

b. upon retirement, current employees who became members of the MEABF prior to January 1, 2011, must forgo an AAI in 2017, 2019 and 2025 (*id.*);

c. upon retirement, employees who become members of the MEABF on or after January 1, 2011, must forgo any AAI in 2025 (*see* Public Act 98-0641 amendments to 40 ILCS 5/1-160(b-5)(e)); and

d. employees who retire after June 9, 2014, cannot receive an AAI until one full year after the date on which the employee otherwise would have received her or his initial AAI under the Pension Code prior to Public Act 98-0961. (*See* Public Act 98-0641 amendments to 40 ILCS 5/8-137(b-5)(1).)

43. Public Act 98-0641 spares MEABF members who receive a yearly pension of less than \$22,000 the AAI skips in 2017, 2019 and 2025, but those members nevertheless will receive AAIs that are substantially less than the AAIs they would receive but for Public Act 98-0641. (*See* Public Act 98-0641 amendments to 40 ILCS 5/8-137(b-5)(4); 5/8-137.1(b-5)(3).)

**C. PUBLIC ACT 98-0641 REQUIRES MEABF MEMBERS TO CONTRIBUTE A GREATER PERCENTAGE OF THEIR SALARIES TO THE PENSION FUND**

44. Presently, active members of the MEABF contribute 8.5% of their salary toward their pensions. (*See* 40 ILCS 5/8-174(a); 5/8-182 and 5/8-137, prior to Public Act 98-0641.)

45. Upon implementation, Public Act 98-0641 diminishes and impairs pension benefits of active members of MEABF by requiring them to contribute more of their salary toward their pensions. (*See* Public Act 98-0641 amendments to 40 ILCS 5/8-174(a).) Under Public Act 98-064, employee contributions will increase by .05% each year from 2015 to 2019, thereby raising the contribution to 11% in 2019 and each year thereafter. (*See* Public Act 98-0641 amendment to 40 ILCS 5/8-174(a); *see also* 40 ILCS 5/8-182; 5/8-137.) Should the

MEABF obtain a 90% funding ratio, employee contributions will decrease to 9.75% and remain at that amount as long as the fund maintains a 90% funded ratio. (*Id.*)

46. In other words, regardless of the funding ratio, employees will have to pay more during the terms of their employment only to get less in retirement. Like the other changes described above, a change in the formula used to calculate pension benefits that results in public employees paying more for the same benefit, much less paying more for a *diminished* benefit, is the type of unlawful and unfair conduct that the Pension Protection Clause prohibits.

**D. THE MAGNITUDE OF HARM PUBLIC ACT 98-0641 WILL CAUSE EACH MEABF MEMBER WILL CONTINUE TO INCREASE OVER TIME**

47. With each passing year, members of the MEABF will suffer increasing unconstitutional diminishment and impairments as a result of Public Act 98-0961. For example, consider the circumstances of the retiree referenced above who has a gross pension amount of \$34,000 in 2014. Assuming a CPI-U of 3% each year after 2016, and accounting for the impact of three AAI skips, this retiree's loss of \$2,223.60 after two years would balloon into a loss of approximately \$184,960 after 20 years. Active employees who are required to contribute more over their salary toward their pension will face a similar harm that increases each year. An increase in salary deductions for the same, much less a reduced, benefit is, conceptually, no different than a diminution of the benefit itself.

48. Simply put, if Public Act 98-0641 is implemented, each individual Plaintiff, as well as each member of the MEABF, will suffer diminishment and impairment of pension benefits. That is both unfair and unconstitutional.

49. These diminishment and impairments, moreover, are harmful. In the short term, during the pendency of this litigation, the reductions would impose a hardship on members of MEABF who would not be able to meet financial obligations, such as mortgage, rent or health

care payments, undertaken in reliance on the promise the Pension Code embodies and the Protection Protection Clause protects. And, in the long-term, in addition to losing approximately \$184,960 over the course of a 20-year period, the retiree with a gross pension of \$34,000 in 2014 also would lose her hedge against inflation. As a result, the retiree's pension benefit in 2034 would be worth only approximately \$23,381 in today's dollars, assuming a CPI-U of 3%.

50. Stated otherwise, whatever the temporal perspective considered, personal financial commitments and planning for retirement security – often years in the making based on the promise embodied in the Pension Protection Clause – will be defeated absent entry of a preliminary injunction that stays implementation of Public Act 98-0641 pending entry of judgment that Public Act 98-0641 violates the Illinois Constitution.

**COUNT I**  
**VIOLATION OF THE PENSION PROTECTION CLAUSE OF THE ILLINOIS CONSTITUTION**

51. Plaintiffs incorporate by reference Paragraphs 1 through 50 of their Complaint, as if set forth fully herein.

52. The Pension Protection Clause of the Illinois Constitution mandates that the benefits of being a member of a public pension system, such as the MEABF, cannot be diminished or impaired:

Membership in any pension or retirement system of the State, any unit of local government or school district, or any agency or instrumentality thereof, shall be an enforceable contractual relationship, the benefits of which shall not be diminished or impaired.

(Ill. Const. 1970, art. XIII, § 5.)

53. The individual named Plaintiffs, as well as all members of the MEABF, will be individually and directly harmed by implementation and enforcement of Public Act 98-0641.

Public Act 98-0641 diminishes and impairs pension benefits to which each member of the MEABF is constitutionally entitled, in contravention of the Pension Protection Clause.

54. Public Act 98-0641 is therefore unconstitutional, void in its entirety, and of no force and effect.

55. This case presents an actual controversy concerning the unconstitutionality of Public Act 98-0641. The named Plaintiffs, as well as AFSCME, CTU, Teamsters and INA on behalf of their members in the MEABF, have a direct interest in that controversy.

56. Temporary, preliminary and permanent injunctive relief is appropriate and necessary in this case because, should Public Act 98-0641 be implemented, protectable and vested pension are guaranteed by the Illinois Constitution will be irreparably harmed with no adequate remedy at law. Plaintiffs are likely to succeed on the merits. The equities here weigh in favor of upholding the Constitution and protecting the pension benefits Illinois promised Plaintiffs and other MEABF participants by enjoining the implementation of the Act.

WHEREFORE, Plaintiffs respectfully request that the Court:

(a) enter declaratory judgment that Public Act 98-0641 violates the Pension Protection Clause of the Illinois Constitution and, therefore that the entirety of Public Act 98-0641 is void, illegal and of no force and effect;

(b) award temporary, preliminary and permanent injunctive relief as necessary to implement such declaration and protect the status quo (*i.e.*, application of the Pension Code just prior to implementation of Public Act 98-0641) pending a declaration that Public Act 98-0641 is unconstitutional and of no force and effect;

(c) in the event that the Court does not enter a temporary or preliminary injunction pending a final decision that the Act is unconstitutional, order the MEABF to

restore their members to their respective pension benefits, including pension amounts and interest on those amounts, as if Public Act 98-0641 was not enacted;

(d) award Plaintiffs the fees and costs incurred to enforce their rights, including prosecution of this lawsuit; and

(e) award Plaintiffs such additional relief as is just and equitable.


**PLAINTIFFS DEMAND A TRIAL BY JURY ON ANY ISSUES  
WHICH ARE, OR MAY BECOME, TRIABLE BY JURY**



Dated: December 16, 2014

Respectfully submitted,

MARY J. JONES, LINDA BALLENTINE,  
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TEAMSTERS LOCAL 700 and ILLINOIS  
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