NOTICE OF INTENTION TO FILE SUIT

Article XX - Recovery of Fraudulently Obtained Public Funds | 735 ILCS 5/20-104(b)

November 17, 2026

VIA USPS CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Doug Hays, Acting Mayor and Chief Executive Officer
City of Carmi
225 East Main Street
Carmi, Illinois 62821

RE: Express notice of intention to file suit for recovery under Article XX, 735 ILCS 5/20-101 through 20-104; City of Carmi insurance benefits involving Alderwoman Lacey Bradshaw

Dear Acting Mayor Hays:

I am a resident and taxpayer within the corporate limits of the City of Carmi. Pursuant to 735 ILCS 5/20-104(b), I hereby give express notice of my intention to file a civil action for recovery under Article XX of the Illinois Code of Civil Procedure, on behalf of the City of Carmi, if the City does not take the action or give the notice specified by that statute and suit is otherwise legally available. Any recovery sought would belong to the City, not to me.

This notice concerns municipal health-insurance benefits provided to Alderwoman Lacey Bradshaw and the administration of those benefits by City officials, including City Clerk and Health Insurance Administrator Cynthia J. Attebury. The grounds described below arise from City insurance, payroll, council, and related records.

Documented grounds for the proposed recovery action

The January 2, 2024 City of Carmi Insurance Change Request Form identifies Lacey Bradshaw, records a payroll-deduction or amount change, and bears the handwritten signature "C. Attebury" on the line labeled "Employee Signature." The same form contains a handwritten notation referring to a copy to Holly Healy on January 4, 2024. The City Clerk's insurance-administration duties are documented by Carmi Ordinance 1567 and City Code section 1-6A-2(H).

City-produced plan and payroll records document health-insurance enrollment provisions for elected officials and repeated insurance-related payroll deductions connected to Bradshaw. The amounts deducted from her pay are not the same as the City-funded premium; the financial recovery sought must be measured using actual City payments, allocations, credits, and refunds.

A signed document captioned Resolution No. 10.09.25 recites that no record existed of formal City Council approval of health-insurance participation by council members. Its handwritten vote notation appears inconsistent with the resolution text, and the City's exact action must be determined from the official minutes and vote. In responses dated September 29 and October 22, 2026, the City reported no responsive records in specified categories seeking authorization for elected-official coverage, notwithstanding related plan materials produced.

In addition, a December 18, 2025 email describing a January 1, 2026 cessation of coverage differs from an enrollment-termination form listing February 1, 2026. These are specific transactions and official records requiring legal and financial reconciliation, not an abstract request for a general investigation.

Statutory bases and persons whose liability should be assessed

Section 20-101 expressly includes medical and other health benefits. Section 20-102 authorizes recovery of benefits obtained through a false or fraudulent record, required-but-omitted status notification, willful misrepresentation, or other fraudulent device, including recovery from a recipient or a person who knowingly aided the obtaining of benefits. Section 20-103 addresses benefits knowingly obtained without entitlement by false representation, willful concealment, or other fraudulent scheme. My intended action concerns recovery from those legally responsible, including Bradshaw as the identified benefit recipient and any person whose knowing assistance or other actionable conduct is established, potentially including the City official who executed and administered the change form.

The underlying authority for any elected-official compensation must be evaluated under 65 ILCS 5/3.1-50-5 and 3.1-50-10 and 50 ILCS 145/2, alongside the City's actual ordinances and plan-adoption history. The City-produced plan lists elected officials as eligible; I am not overlooking that document. The issue is whether the City lawfully approved and paid the benefit for the periods at issue, and whether the form or subsequent transactions were truthfully authorized.

Demand and statutory opportunity for municipal action

I demand that the City promptly (1) preserve the originals, change histories, carrier records, communications and related financial records; (2) secure an independent legal and financial determination of the authority for the insurance expenditures and of the actual net public funds at issue; (3) determine who authorized and submitted the 2024 form and the subsequent coverage changes, including the noted Holly Healy copy; (4) make the good-faith informal collection effort contemplated by 735 ILCS 5/20-104(a) where sums are found owing; and (5) pursue settlement or civil recovery through properly authorized City counsel, or the State's Attorney if lawfully requested and agreed.

Under 735 ILCS 5/20-104(b), the 60-day period is measured from the delivery date shown on the certified-mail return receipt. If the City intends to invoke the statutory alternatives of an arranged settlement or an intended lawsuit, please provide the specified notice to me by certified mail, return receipt requested. A denial of the alleged liability, or failure to take action following a stated commitment, will also be evaluated under the statute. A copy presented to the City Council is supplementary and is not offered as a substitute for this certified mailing.

Please preserve this notice, the original records relating to the insurance transactions described above, and the City's complete response in the municipal records. This notice is distinct from my separate demand under 65 ILCS 5/1-5-1, and does not waive that remedy or any other lawful avenue of recovery.

Respectfully,

Signature: _____

Landon "Rudy" Rudolph

Resident and taxpayer, City of Carmi, Illinois

Return mailing address: _____

_____

Telephone or email (optional): _____