LACEY BRADSHAW / CYNTHIA J. ATTEBURY

Insurance investigation - documentary evidence overview | Landon "Rudy" Rudolph

I examined the City of Carmi's health-insurance arrangements for Alderwoman Lacey Bradshaw after obtaining records of her municipal employment, alderman pay, insurance transactions and council action. My question is whether this coverage was legally authorized as an elected-official benefit, how it was administered, and whether City funds were spent without the required authority.

The City Code assigns Clerk Cynthia J. Attebury duties as Human Resource Director and Health Insurance Administrator. A January 2, 2024 change form identifies **Lacey Bradshaw by name at the top**, lists a $120.34 monthly amount, and carries "C. Attebury" on the line marked "Employee Signature." I found no document resolving who authorized that signature or what transaction it produced. The handwritten note refers to Holly Healy. **[A, E]**

I compared pay statements showing current insurance deductions of **$0.00** in May and October 2024 and May and October 2025. The December statements list **$601.70** in year-to-date deductions for both years. A January 2026 check has no plan-deduction line. Those facts do not establish what the City paid in premiums. **[F, G, N]**

The October 7, 2025 minutes recount Attebury's explanation that the plan required 30 hours of work, that council members were not eligible under that rule, and that family-of-four coverage cost approximately **$26,000**, excluding claims. The council then voted to continue coverage. The signed resolution says no record of prior formal council approval was identified. **[K, L]**

A December 18, 2025 email refers to ending coverage January 1, 2026; a separate termination form appears to show February 1. I seek the actual coverage and payment ledger for that period. **[M, O]**

PAYROLL AND COVERAGE FINDINGS

Exhibit letters are identical to the full investigative report.

Pay statement	Observed entry	Exhibit
May 30, 2024	Current CCHCP2 entry $0.00	F / 1 of 3
Oct. 31, 2024	Current CCHCP2 entry $0.00	F / 2 of 3
Dec. 2024	Year-to-date insurance deductions $601.70	F / 3 of 3
May 29, 2025	Current CCHCP2 entry $0.00	G / 1 of 3
Oct. 30, 2025	Current CCHCP2 entry $0.00	G / 2 of 3
Dec. 2025	Year-to-date insurance deductions $601.70	G / 3 of 3
Jan. 22, 2026	No health-plan deduction line shown	N

I do not equate a zero-current paycheck deduction with proof that a premium was unpaid, nor do the year-end payroll totals show the City's own annual premium spending. The $120.34 on the change form equals two $60.17 deductions; the City reported no responsive record explaining the calculation. **[E, F, G, Q]**

At the October 7, 2025 council meeting, Attebury estimated that insuring a family of four cost the City approximately **$26,000**, excluding claims. That was an estimate about family coverage, not a verified invoice for Bradshaw. The actual City-paid amounts remain the financial question. **[L, Q]**

The email describing a January 1, 2026 end date and the termination form indicating February 1 require a carrier coverage history and any January premium adjustments. **[M, O]**

POTENTIAL OFFENSES AND REQUIRED PROOF

Allegations for investigation; the packet does not establish all criminal elements.

720 ILCS 5/33-3(a)(3) - official misconduct

The City Clerk's insurance-administration duties, change form and council records raise questions about an act exceeding lawful authority, done with intent to obtain an advantage for another. The relevant records are **[A, B, E, K, L]**. The original authorization, particular official act and intent remain to be proved.

720 ILCS 5/17-3 - forgery

"C. Attebury" appears on the "Employee Signature" line of a form identifying Bradshaw. **[E]** The document alone does not prove a false authorization or intent to defraud; the original processing trail is needed.

720 ILCS 5/16-1 - theft

The change form, payroll entries and end-date discrepancy require reconciliation to City disbursements. **[E, F, G, M, N, O]** City-paid amounts, unauthorized control and the required intent have not been demonstrated.

720 ILCS 5/32-8; 50 ILCS 205/4(a) - records

No-responsive-records statements require scrutiny of searches and retention. **[Q]** They do not alone prove alteration, concealment or destruction of an existing public record.

Municipal compensation: **65 ILCS 5/3.1-50-5 and 3.1-50-10**; 50 ILCS 145/2(a). FOIA access duties: **5 ILCS 140/2.5, 3, 3.5, 9 and 11**. PAC Opinion 24-014 concerns reasonable search; it does not decide this case.

FOIA RECORDS: REQUESTED / PRODUCED / MISSING

The City reported that some premium and spending documents were attached.

Request category	Records requested	City answer
26.30 #4 (Sept. 16)	Premiums, City expenditures, participant payments	Records attached
26.30 #6	Legal authority for postemployment or alderman coverage	No responsive documents
26.32 #2 (Sept. 29)	Explanation: $120.34 vs. $60.17 deduction	No responsive documents
26.32 #5	Monthly actual premiums, City share, participant share, credits/refunds	Records attached
26.32 #7	Elected-official insurance authority	No responsive documents
26.32 #9	Jan./Feb. 2026 termination records	Records attached
26.32 #10	Coverage-related communications	No responsive documents
26.32 #11-13	Activity logs, nonprivileged counsel records and search notes	No responsive documents

I asked for premium payments and City expenditures repeatedly. The City reported producing responsive records for financial categories; the record still lacks an independently reconciled month-by-month account proving the amount the City actually paid for Bradshaw's coverage. A response saying "records attached" must be tested against the contents of those attachments. **[Q]**

The unrelated third-party requester's identifying information is excluded. My audit summarizes the requests and City answers; it is not presented as a photographic reproduction of the emails.

MY CONCLUSION AND REQUESTED INVESTIGATION

I request an independent comparison of the City's actual adopted compensation ordinances and health-plan amendments against its administration of alderman health insurance, the signed October 2025 resolution and the October 7 council minutes. I want the original January 2024 change request, its submission and authorization records, and any instructions regarding the coverage. **[A, B, E, K, L]**

I also request a carrier-by-carrier, month-by-month reconstruction of insurance costs, City payments, employee and alderman deductions, refunds, credits and the effective date of cancellation. The December 2025 email and February 2026 termination form must be reconciled with actual coverage. **[F, G, M, N, O, Q]**

The present exhibits document an insurance arrangement, a disputed authorization history and unanswered accounting questions. I have not authenticated the source of Bradshaw's consent to the form, established a stolen dollar amount or proved criminal intent. I ask the receiving investigators to resolve those questions from originals rather than estimates.

Reading guide: The exhibit directory on the next page uses the **same letters in both packets**. The short overview contains selected complete original pages. Exhibits omitted from the overview are listed as "Full only," so no letter changes meaning between the two documents.

EXHIBIT DIRECTORY AND PAGE GUIDE

The same exhibit letter identifies the same record in both reports.

Records are arranged by function and date: municipal authority; employment and payroll; the 2024 change form; council action; termination; and FOIA responses. **"Full only"** means that the overview intentionally omits those pages, not that the exhibit was renumbered.

Ex.	Document / source	Full report	Overview
	MUNICIPAL AUTHORITY		
A	Municipal code: clerk duties and compensation	19-20	7
B	City health-plan eligibility provisions	21-28	8
	EMPLOYMENT / PAYROLL AND 2024 CHANGE		
C	Employment wage statement	29	Full only
D	2023 alderman pay statements	30-37	Full only
E	January 2, 2024 insurance change request	38	9
F	2024 alderman pay statements	39-50	10-12
G	2025 alderman pay statements	51-62	13-15
	COUNCIL ACTION / AUTHORIZATION		
H	Insurance-related forwarding email	63	Full only
I	Clerk / attorney / council correspondence	64-66	Full only
J	Unsigned draft resolution	67	Full only
K	Signed Resolution 10.09.25 with vote note	68	16
L	October 7, 2025 council minutes (transcription)	69-70	17-18
	COVERAGE END / 2026 PAYROLL		
M	December 18, 2025 coverage-end email	71	19
N	January 22, 2026 pay statement	72	20
O	Termination request: February 1 effective date	73	21
P	2026 payroll and status materials	74-82	Full only
	FOIA RESPONSE ACCOUNTING		
Q	FOIA response categories / missing-records audit	83-85	22-24

EXHIBIT A

Municipal code: clerk duties and compensation

1-6A-2: DUTIES:

The City Clerk shall have the following duties:

A. Attend Meetings: Attend all regular and special meetings of the City Council.

B. Journal Kept: Keep a correct journal of the proceedings, and record the same in a book to be kept for that purpose.

C. Record And Publish Ordinances: Record in a separate book, all ordinances passed from time to time and cause such as impose any fine, penalty, imprisonment, or forfeiture, or make any appropriation to be published at least once, within thirty (30) days after passage, in one (1) or more newspapers with a general circulation within the City.

D. Books And Records Kept: Keep and faithfully preserve all papers, books and documents belonging to his office, and have the custody of all papers, books, maps and documents belonging to the City, and not in actual use of the City officers.

E. Communications To Council: Without delay, deliver to the City Council all communications and documents addressed to the same and coming into his custody.

F. Corporate Seal And Supplies Kept: Keep the Corporate Seal of the City, and affix the same to all documents and writings as provided by law.

G. Additional Duties: Do and perform such other duties as may be required of him by the laws of this State, the ordinances of the City, and the orders and resolutions of the City Council. (Ord. 8, 10-24-1899; amd. 2006 Code)

H. Defining Duties: Defining duties of the elected office of City Clerk beyond those duties outlined in the Illinois Municipal Code[1]:

1. Human Resource Director.
2. Risk Management Coordinator.
3. Health Insurance Administrator.
4. IMRF Administrator.
5. Freedom of Information Act (FOIA) Officer. (Ord. 1567, 11-5-2020)

Notes

1 1. 65 ILCS 5/3.1-10-40.

PLAN SPONSOR / PLAN ADMINISTRATOR / AGENT FOR LEGAL PROCESS: City of Carmi. **TIN:** 37-6002336. **END OF PLAN YEAR:** Jan. 31. **PLAN #:** 501. **TYPE OF PLAN:** Welfare plan for payment of health care expenses as defined herein. **CLAIM ADMINISTRATOR:** Mutual Medical Plans, Inc., 416 Main St., Suite 1025, Peoria, IL 61602. (309) 674-0888 or (800) 448-4689. **AMENDMENTS:** The plan sponsor reserves the right to amend or discontinue the plan.

CONTRIBUTIONS: You contribute to the Plan in amounts determined by the plan sponsor. The balance of costs are paid by the plan sponsor.

ELIGIBILITY: Regular full time employees scheduled to work 40 or more hours per week and elected officials become eligible for coverage on the date of hire. You must enroll prior to your first date of eligibility. If you have a new dependent as a result of marriage, birth, adoption, or placement for adoption, you may be able to enroll yourself and your dependents provided that you request enrollment prior to 30 days after the marriage, birth, adoption, or placement for adoption. If you or a dependent lose other health plan coverage which you had at the time coverage in this Plan was declined, you must request enrollment in the Plan within 30 days after such other coverage is lost. An individual's failure to pay premium does not constitute loss of other coverage. If such other coverage was COBRA, the COBRA coverage must be exhausted. If such other coverage was not COBRA, the coverage will be considered lost if the prior employer discontinues contributions or if eligibility for such other plan is lost. Coverage will become effective on the first of the month after your timely request for enrollment due to marriage or loss of other coverage. For birth, adoption or placement for adoption, coverage becomes effective on the date of the event, or later if agreed to by you and the Plan Sponsor, assuming you made a timely request for coverage. A person eligible for the Plan may enroll within 60 days of the eligibility date, termination date, or premium assistance eligibility date of Medicaid or CHIP. If you do not enter the Plan under the above provisions, it will not be possible for you to enroll in the Plan. If you are covered under a plan that penalizes you or your spouse if you do not enroll in this Plan, you will not be eligible for medical benefits under this Plan unless an exception is made by the Plan Sponsor, but you may enroll in the Medical Reimbursement Plan. If your spouse is employed where medical coverage is offered or subsidized for any employees, the spouse will not be covered in this Plan unless enrolled in the other employer's program, unless an exception is made by the Plan Sponsor.

TERMINATION: Coverage will terminate on the last date of employment, when you elect termination (retroactive termination must be approved by the Plan Sponsor), when an individual is no longer eligible, when it is determined to be in an individual's best financial interest, or when any required contributions are not made. Covered employees who are unable to work due to illness or injury will continue in the Plan until the plan sponsor terminates employment in accordance with its own internal policy. When it is in the best financial interest of a plan member, coverage may be terminated with or without evidence of good health.

DEFINITIONS:

"You" and **"Employee"** means an employee or an elected official of the City of Carmi.

"Plan" means the group health care plan described herein.

"Dependent" means your lawful spouse who resides with you in common residence, and your unmarried under age 19 natural child, adopted child, child placed with you for adoption, or stepchild, who is primarily dependent on you and your spouse for support and maintenance and for whom you or your spouse have legal guardianship or legal custody. A child referenced above who is at least age 19 but under age 26 (age 30 if a veteran residing in Illinois) may be covered without regard to residence, financial support, or marriage providing that you or your spouse have legal guardianship or legal custody of the child, or had such guardianship or custody when the child turned age 18. Future enrollment of a qualified dependent child is available each year in the final month of the Plan year for a dependent child who has had at least 90 days of coverage with another private or public health care plan without a 63 day gap in coverage prior to the date a signed application is received by the Plan Sponsor.

"Physician" means a duly licensed M.D., D.O., D.C., O.D., D.P.M., D.D.S., licensed Physician Assistant or Nurse Practitioner, or in the case of outpatient mental care, any mental health provider licensed by the state.

"Hospital" means an institution primarily engaged in providing care to the sick under supervision of a staff of physicians and registered nurses on a 24 hour basis, or a state licensed ambulatory surgery center that has an agreement with the Plan or Claim Administrator. It does not include health resorts or nursing homes but does include a substance abuse treatment facility if the admission to such facility is approved by the Claim Administrator.

"Reasonable and Customary" means the fee most commonly charged for a service by other health care providers in a similar area as determined by the Claim Administrator. **"Maximum Allowable Charge"** means 200% of the Medicare allowance or a 100% profit based on the AHD data base cost to charge ratio for all services or an amount agreeable to the Plan. If a hospital does not accept one of these amounts within 30 days of the offer, the Plan may then consider the admission as a non-covered service and reimburse the member the amount the member owes under that hospital's financial assistance program plus a financial incentive to the plan member as determined by the Plan.

EXHIBIT E

January 2, 2024 insurance change request

City of Carmi

INSURANCE CHANGE REQUEST FORM

This form should be used for miscellaneous membership and payroll deduction change requests.

- CITY OF CARMI HEALTH CARE PLAN

Employee Name: Lacey Bradshaw Date of Birth: [redacted]

This change request is for: ☐ employee ☐ dependent ☐ all family members

Dependent Name(s): _____ ☐ Spouse ☐ Child

_____ Date of Birth: _____

☐ Change Name to: _____

☐ Change Address to: _____

☐ Change Coverage from: ☐ Major Medical ☐ MRP ☐ Maxi ☐ Maxi II ☐ ACP To: ☐ Major Medical ☐ MRP ☐ Maxi ☐ Maxi II ☐ ACP

EFFECTIVE DATE _____

☐ Terminate Coverage for this reason:

EFFECTIVE DATE _____

☐ Child age limit ☐ Death ☐ Divorce ☐ In my best financial interest ☐ Other: _____

☐ Obtained other coverage ☐ Through a spouse ☐ Medicare or Medicaid ☐ Individual Policy ☐ Other: _____

☒ Authorize payroll deduction or amount change Mut Med Monthly Amount: 180.34

- Insurance Programs and Additional Payroll Deductions

☐ Add Coverage for:

EFFECTIVE DATE _____

☐ Terminate Coverage for:
☐ Aflac
☐ Family Heriatge
☐ NCPERS
☐ TASC
☐ Colonial
☐ Liberty National
☐ Washington National
☐ Christmas Club

☐ Authorize payroll deduction or amount change Monthly Amount: 180.34

Employee Signature C. Attebury Date: 1-2-24

1-4-24 Copy to Holly

2024 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

05/30/2024 PERIOD END:05/25/2024

** LACEY BRADSHAW **

EARNINGS				DEDUCTIONS			TAXES			RECAP		
	HOURS	RATE	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD	CURRENT	YTD
GROSS			400.00	2,000.00	CCHCP2	0.00	240.68	FICA	24.80	109.08	400.00	2,000.00
SALARY			400.00	2,000.00				MEDICAR	5.80	25.52	50.40	221.68
								STATE	19.80	87.08	0.00	240.68
											349.60	1,537.64

DIRECT DEPOSIT

[redacted] 349.60

** LACEY BRADSHAW **

[redacted]

DEPT: [redacted]
EMP#:
DATE: 05/30/2024
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $349.60

City FOIA response - original attachment page 49 of 88. Entire source page shown.

2024 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

** LACEY BRADSHAW ** 10/31/2024 PERIOD END:10/26/2024

EARNINGS				DEDUCTIONS		TAXES			RECAP		
	HOURS	RATE	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD	
GROSS			400.00	4,000.00	CCHCP1	0.00	60.17	FICA	24.80	218.16	GROSS	400.00	4,000.00
SALARY			400.00	4,000.00	CCHCP2	0.00	421.19	MEDICAR	5.80	51.04	TAXES	50.40	443.36
								STATE	19.80	174.16	DEDUCT	0.00	481.36
											NET	349.60	3,075.28

DIRECT DEPOSIT

[redacted] 349.60

** LACEY BRADSHAW **

[redacted]

DEPT: [redacted]
EMP#:
DATE: 10/31/2024
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $349.60

City FOIA response - original attachment page 44 of 88. Entire source page shown.

2024 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

** LACEY BRADSHAW ** 12/26/2024 PERIOD END:12/21/2024

EARNINGS					DEDUCTIONS			TAXES			RECAP	
	HOURS	RATE	CURRENT	YTD	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD
GROSS			400.00	4,800.00	CCHCP1 0.00	120.34	FICA	21.07	260.30	GROSS	400.00	4,800.00
SALARY			400.00	4,800.00	CCHCP2 60.17	481.36	MEDICAR	4.93	60.90	TAXES	42.82	529.00
							STATE	16.82	207.80	DEDUCT	60.17	601.70
										NET	297.01	3,669.30

DIRECT DEPOSIT
[redacted] 297.01

2024

** LACEY BRADSHAW **
[redacted]

DEPT: [redacted]
EMP#:
DATE: 12/26/2024
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $297.01

City FOIA response - original attachment page 42 of 88. Entire source page shown.

2025 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

05/29/2025 PERIOD END:05/24/2025

** LACEY BRADSHAW **

EARNINGS				DEDUCTIONS		TAXES		RECAP	
	HOURS	RATE	CURRENT	YTD	CURRENT	YTD	CURRENT	YTD	CURRENT	YTD
GROSS			400.00	2,000.00 CCHCP2	0.00	240.68 FICA	24.80	109.08 GROSS	400.00	2,000.00
SALARY			400.00	2,000.00		MEDICAR	5.80	25.52 TAXES	50.40	221.68
						SIPAE	19.80	87.08 DEDUCT	0.00	240.68
								NET	349.60	1,537.64

DIRECT DEPOSIT

[redacted] 349.60

** LACEY BRADSHAW **

[redacted]

DEPT: [redacted]
EMP#:
DATE: 05/29/2025
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $349.60

City FOIA response - original attachment page 58 of 88. Entire source page shown.

2025 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

10/30/2025 PERIOD END:10/25/2025

** LACEY BRADSHAW **

EARNINGS					DEDUCTIONS		TAXES			RECAP	
	HOURS	RATE	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD	CURRENT	YTD
GROSS			400.00	4,000.00	CCHCP2	0.00	481.36	FICA	24.80	218.16	GROSS	400.00	4,000.00
SALARY			400.00	4,000.00				MEDICAR	5.80	51.04	TAXES	50.40	443.36
								STATE	19.80	174.16	DEDUCT	0.00	481.36
											NET	349.60	3,075.28

DIRECT DEPOSIT

[redacted] 349.60

** LACEY BRADSHAW **

[redacted]

DEPT: [redacted]
EMP#:
DATE: 10/30/2025
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $349.60

City FOIA response - original attachment page 63 of 88. Entire source page shown.

2025 alderman pay statements

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

** LACEY BRADSHAW ** 12/24/2025 PERIOD END:12/20/2025

EARNINGS				DEDUCTIONS		TAXES			RECAP		
	HOURS	RATE	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD
GROSS			400.00	4,800.00	CCHCP2	60.17	601.70	FICA	21.07	260.30	GROSS	400.00	4,800.00
SALARY			400.00	4,800.00				MEDICAR	4.93	60.90	TAXES	42.82	529.00
								STATE	16.82	207.80	DEDUCT	60.17	601.70
											NET	297.01	3,669.30

DIRECT DEPOSIT

[redacted] 297.01

** LACEY BRADSHAW **

[redacted]

DEPT: [redacted]
EMP#:
DATE: 12/24/2025
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $297.01

City FOIA response - original attachment page 65 of 88. Entire source page shown.

EXHIBIT K

Signed Resolution 10.09.25 with vote note

Resolution No. 10.09.25

A Resolution Regarding City Council Members Ineligibility for Health Insurance

Whereas, there is no record of the Carmi City Council formally approving participation for City Council Members to receive City of Carmi health insurance benefits;

Whereas, under the Affordable Care Act, employees should work 30 hours a week to be offered health coverage;

Therefore, be it resolved by the Mayor and City Council that Carmi City Council Members at not eligible for health benefits from the City of Carmi.

Be it further resolved that Carmi City Council members may have access to the City's employer clinic.

Effective January 1, 2026.

Approved this 7th day of October, 2025.

William B. Stendeback, Mayor

ATTEST: Cynthia Attebury, Clerk

AYES: 6
NAYS: 1
Absent: -
Abstain: 1

The Council voted AGAINST doing away with the insurance (health) for Council Members

Signed resolution from separately supplied original; entire source page shown.

October 7, 2025 council minutes (transcription)

OCTOBER 7, 2025 CITY COUNCIL MINUTES

User-supplied transcription of the minutes. This is not an image of a certified official copy. Spelling and wording are preserved as supplied.

The Carmi City Council held the regular monthly council meeting on October 7, 2025, at 5:30 p.m. in the City Council Room. The meeting was called to order by Mayor Stendeback.

Prior to opening the council meeting, Mayor Stendeback asked Alderman Doug Hays to give the invocation followed by the Pledge of Allegiance.

Mayor Stendeback presided with the following Alderpersons present: Greg Knight, Mark W. Blake, Tracy Nelson, Lacey Bradshaw, Mike Knight, Doug Hays, Jeremy Courson and Jack Bradshaw.

The Council Meeting Closed Minutes from September 16, 2025, were presented for approval. Alderperson Hays made a motion to approve with a second by Alderperson Bradshaw. The motion carried on roll call by each Alderperson present answering "yes" except for Alderperson Courson who abstained.

The Special Council Meeting Minutes from September 11, 2025, were presented for approval. Alderperson Hays made a motion to approve with a second by Alderperson Blake. The motion carried on roll call by each Alderperson present answering "yes."

For council consideration, discussion, and possible approval

a. Moran Economic Development, LLC, Invoice #2807 in the amount of $1668.50 ($810.50 paid by TIF1 and $858.00 paid by TIF2). Alderperson Hays made a motion to approve the above invoice with a second by Alderperson Lacey Bradshaw. The motion carried on roll call by each Alderperson present answering "yes."

b. Resolution 10.07.2025; A resolution for the temporary alley closure for Corn Day (Webb Hay). Alderperson Courson made a motion to approve the above resolution. The motion was seconded by Alderperson Lacey Bradshaw. The motion carried on roll call by each Alderperson present answering "yes."

c. Resolution 10.08.2025; A resolution to open a checking account for the IEPA Loan for the Wastewater Treatment Plant Digester Project. Alderperson Blake made a motion to approve the above resolution with a second by Alderperson Jack Bradshaw. The motion carried on roll call by each Alderperson present answering "yes."

d. Resolution 10.09.2025; A resolution regarding the City Council Ineligibility for Health Insurance (Regular, ACP and MRP reimbursements). Mayor Stendeback turned the floor over to City Clerk Attebury who began discussing what the above resolution was referring to. However, Alderperson Bradshaw stated he was "not for this" and "it should have been discussed earlier." At that time Alderperson Jack Bradshaw made a motion to not approve the above resolution with a second by Alderperson Nelson. At that point, Alderperson Bradshaw wanted to discuss the issue which after consulting with the City attorney, was at the discretion of the Mayor which the Mayor did allow. City Clerk Attebury provided information regarding the cost of Alderperson's being on insurance. To insure a family of 4, costs the city approximately $26,000 which does not include any claims. The City of Carmi's Health Care Plan states an employee must work 30 hours per week in order to be eligible for the health insurance. Therefore, according to the Plan, the Alderperson's would not be eligible for the health insurance. Alderperson Lacey Bradshaw said the plan could be changed which Clerk Attebury said it could be, but not until 2026 due to many changes occurring with the health insurance already this year. After a lengthy discussion, the Resolution was brought to a vote. Alderperson Mark Blake voted "No" to not allow the alderpersons to have insurance due to it not being legal in accordance with the healthcare plan.

Alderperson Doug Hays "abstained" from the vote. However, pursuant to Prosser v. Village of Fox Lake 91-l112d 389, the vote of Alderperson Hays is being listed as a yea. The remaining alderpersons present voted "yes" to continue the health insurance for the Alderpersons.

e. Ordinance 1668; An ordinance regarding Carmi Light and Water not accepting credit and debit cards. Mayor Stendeback said he was again bringing the credit card fees to the Council. The month of September 2025, the fees were around $52,000 which Carmi Light and Water is paying for credit card usage. With the fees continuing to increase monthly, within the next 12 months, we could potentially be paying over $600,000 in fees. The credit card company is Global Payment Systems, which is one of a few that integrates with the Carmi Light and Water software, Tyler Technology. Clerk Attebury said contact had been made with First Mid Bank to see what processing company they use which is Global Payment Systems. We have also had meetings with First Bank who has been trying to assist Carmi Light and Water with this issue. Alderperson Hays said he fees like this is a service we should provide to the residents but definitely not at a $600,000 cost to Carmi Light and Water. After a lengthy discussion, Alderperson Hays made a motion to table this ordinance until more information could be received. Clerk Attebury told Alderperson Hays that in order for this ordinance to go into effect, it has to be publicized in a newspaper for 30 days prior to effect date. Alderperson Blake seconded the motion. The motion carried on roll call by each Alderperson present answering "yes."

f. Approval to advertise for demolition bids on 200 West Kerney Street Property. Alderperson Blake made a motion for approval to advertise for demolition bids with a second by Alderperson Courson. The motion carried on roll call by each Alderperson present answering "yes."

Reports and/or updates from Mayor Stendeback

None.

EXHIBIT M

December 18, 2025 coverage-end email

Cynthia Attebury

From: Cynthia Attebury
Sent: Thursday, December 18, 2025 9:19 AM
To: Greg Stewart
Subject: City Insurance

Good morning, Greg. The Mayor has made the decision to terminate offering Aldermen or anyone else that does not meet the standard requirements health insurance effective January 1, 2026.

Thank you.

Cynthia J. Attebury, City Clerk
City of Carmi
225 East Main Street
Carmi, IL 62821
O: 618-384-2001
C: 618-384-9540
clerk@cityofcarmi.com

EXHIBIT N

January 22, 2026 pay statement

***** D I R E C T D E P O S I T S T U B *****

CITY OF CARMI, IL

** LACEY BRADSHAW ** 01/22/2026 PERIOD END:01/17/2026

EARNINGS				DEDUCTIONS		TAXES			RECAP	
	HOURS	RATE	CURRENT	YTD	CURRENT	YTD		CURRENT	YTD		CURRENT	YTD
GROSS			400.00	400.00			FICA	24.80	24.80	GROSS	400.00	400.00
SALARY			400.00	400.00			MEDICAR	5.80	5.80	TAXES	50.40	50.40
							STATE	19.80	19.80	NET	349.60	349.60

DIRECT DEPOSIT

[redacted] 349.60

2026

** LACEY BRADSHAW **

[redacted]

DEPT:
EMP#: [redacted]
DATE: 01/22/2026
CHECK AMOUNT: $0.00
DEPOSIT AMOUNT: $349.60

EXHIBIT O

Termination request: February 1 effective date

GROUP NAME: City of Carmi

Fax to: 309-674-5420

Email to: carolmutmed@hotmail.com (put "MEMBERSHIP" in the Subject Line)

New Members	Eff. Date

Terminated Members	Eff. Date
Lacey Bradshaw	2-1-26

Present Name under Plan	Name or Contract Change	Eff. Date of Change	Single to Family	Family to Single

PREPARED BY: CYNTHIA J. ATTEBURY CJA DATE: 2-08-2026

EXHIBIT Q | 1 OF 3

Investigator-prepared summary of City correspondence; not an original City response.

I compared the FOIA requests and replies by **requested category**. The neutral label "third-party requester" is used to protect that individual. The distinction matters: the City reported records for certain premium categories, not an absence of all premium documents.

Request / date	City reply	Records requested and outcome
09/05 third-party request	09/22 City answer	City expenditures / separation / coverage: attachments reported; participant payments and COBRA: no responsive records.
09/16 request 26.30	09/29 City answer	Categories 1-5,7: responsive materials attached; category 6, legal authority for alderman coverage: no responsive documents.
09/29 supplemental 26.32	09/30 and 10/22	Extension through Oct. 14; demand Oct. 22; substantive answer Oct. 22. The City reported attachments for premium-related categories.

Investigative point: A statement that responsive records were attached does not establish a complete invoice-to-payment reconciliation. A statement that no responsive records were held does not prove those records were destroyed or never existed.

EXHIBIT Q | 2 OF 3

Investigator-prepared summary of City correspondence; not an original City response.

September 29, 2026 supplemental request, answered October 22, 2026. Reported response terms are summarized rather than quoted as an authenticated response.

#	Requested category	City response
1	January 2024 form: preparation, signature and authorization	Records attached
2	Why the $120.34 amount differs from $60.17 deductions	No responsive documents
3	Complete enrollment transaction history	Records attached
4	Coverage tier, covered dependents and premiums	Records attached
5	Monthly premium, City share, participant share, credits/refunds	Records attached
6	Final employment and insurance eligibility dates	Records attached
7	Legal authority for elected-official coverage	No responsive documents

The City said premium and City-payment documents were attached under #5, but reported no records explaining the $120.34 versus $60.17 figures under #2, or establishing elected-official authority under #7.

EXHIBIT Q | 3 OF 3

Investigator-prepared summary of City correspondence; not an original City response.

Remaining categories of FOIA 26.32, including the City Council vote, termination timing, communications and audit trails.

#	Requested category	City response
8	October 2025 council action / related communications	Records; attorney-privilege redactions
9	January versus February 2026 termination records	Records attached
10	Coverage communications and 2024 enrollment	No responsive documents
11	Enrollment/payroll audit and activity logs	No responsive documents
12	Nonprivileged records given to / reviewed by counsel	No responsive documents
13	Search methodology notes / existing records	No responsive documents

I have requested the actual invoices, remittances, payroll contribution registers, credits, refunds and the authorization history. The outstanding question is how much the City paid by month, not merely what was withheld from an alderman paycheck.

Source chronology: September 5 request / September 22 reply; September 16 FOIA 26.30 / September 29 reply; September 29 FOIA 26.32 / September 30 extension / October 22 demand and response.