

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACKIE CUNNINGHAM-BAILEY)
)
 Plaintiff,)
)
 v.)
)
 MICHELE BAUMAN, individually and)
 in her official capacity as AVON)
 TOWNSHIP SUPERVISOR, and AVON)
 TOWNSHIP, an Illinois Township,)
)
 Defendant.)

Case No. 22-CV-4308

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, **Jackie Cunningham-Bailey** by her attorneys, Keith L. Hunt and Delaney A. Hunt of Hunt Law, P.C., and complains against Defendants Michele Bauman, individually and in her capacity as Avon Township Supervisor, and Avon Township, as follows:

I.
NATURE OF THE ACTION

1. Plaintiff **Jackie Cunningham-Bailey** ("Cunningham") brings First and Fourteenth Amendment claims based on Defendants' retaliatory discharge because Plaintiff exercised free speech and political association. Plaintiff brings federal claims under 42 U.S.C. § 1983, the First and Fourteenth Amendments. Plaintiff seeks monetary damages, declaratory judgment, and permanent injunctive relief to prevent Defendants' from continuing to deprive Plaintiff of her rights under the United States Constitution.