

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT

WAYNE COUNTY, ILLINOIS

WAYNE COUNTY HOUSING AUTHORITY,

Plaintiff,

v.

██████████ AND ANY UNKNOWN OCCUPANTS,

Defendants.

Case No. ██████████

CERTIFIED STATEMENT OF ██████████

IN SUPPORT OF MOTION TO DISMISS

I, ██████████ state:

1. I am the named defendant in this case. I am an adult. I make this statement from my personal knowledge. If called as a witness, I could competently testify to the facts stated below.
2. I reside at 303 North First Street, Apartment ██████████ Fairfield, Illinois 62837.
3. The Wayne County Housing Authority (“WCHA”) issued me four successive notices of lease termination dated April 16, July 8, July 27, and August 24, 2026.
4. I requested grievance review concerning each notice through written requests dated:
  - a. April 19, 2026, concerning the April 16 notice;
  - b. July 26, 2026, concerning the July 8 notice;
  - c. August 5, 2026, concerning the July 27 notice; and
  - d. September 2, 2026, concerning the August 24 notice.
5. ██████████ assisted me in preparing these requests. I reviewed and adopted the requests and designated him as my representative for communications and proceedings concerning my grievances.
6. Before I was served with this lawsuit, WCHA had not provided me a grievance hearing resolving any of these four requests. I had received no written grievance decision or

written determination excluding any of those requests from WCHA's grievance procedure.

7. Exhibit A is a true and correct copy of the August 24, 2026 termination notice. On August 24, 2026, WCHA maintenance personnel personally handed me that notice during a maintenance call at my apartment.
8. Page 2 of that notice informed me that I had a right to request a hearing under the WCHA Grievance Policy and directed that the request be made no later than ten days after receiving the notice.
9. Exhibit B is a true and correct copy of my September 2, 2026 written grievance request concerning the August 24 notice. I reviewed and adopted that request before submitting it.
10. On September 2, 2026, I personally carried that written request to WCHA's central office at 303 North First Street, Fairfield, Illinois, and deposited it in the office drop box.
11. Before making the delivery, I sent [REDACTED] a message at approximately 2:59 p.m. identifying the packet dated September 2 and asking him to confirm the planned delivery between 3:45 and 4:00 p.m.
12. Mr. [REDACTED] replied, "Yup today is the day."
13. After completing the delivery, I sent Mr. [REDACTED] the message, "Accomplished and back upstairs," and attached a video of the delivery.
14. Exhibit C is a true and correct screenshot of that message exchange.
15. I recorded the video identified as Exhibit D, "September 2, 2026 Video of Grievance Delivery to WCHA Central-Office Drop Box." It fairly and accurately depicts my delivery. I can identify the office location, the written request I deposited, and the recording.
16. Exhibit E is a true and correct copy of the four-page Grievance Procedure that I personally observed posted for inspection in WCHA's central office and presented there as WCHA's grievance procedure. I recognize it from that posting. I make no statement concerning its adoption date, version number, or the process by which WCHA adopted it.
17. The lease supplied as Exhibit 1 with Plaintiff's complaint is a true and correct copy of my lease, which I recognize from my tenancy and my review of the document.
18. After submitting the September 2 request and before being served with this lawsuit, I received no acknowledgment or other response from WCHA to that request.
19. During that period, WCHA did not contact me to arrange an informal grievance conference. I did not participate in such a conference and received no written informal-settlement summary or disposition.
20. During that period, I received no notice scheduling a grievance hearing concerning the August 24 termination notice, was provided no such hearing, and received no written grievance decision.

21. During that period, I received no written determination stating that my grievance concerning the August 24 termination notice was excluded from WCHA's grievance procedure.
22. On October 19, 2026, the sheriff served me with the summons and complaint in this case.
23. As of the date I sign this statement, WCHA has not provided me a grievance hearing resolving my September 2 request, and I have received no written decision resolving that request or written determination excluding it from the grievance procedure.

CERTIFICATION UNDER 735 ILCS 5/1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct.

Date: 10/19/2026

Signature: /s/ [REDACTED]

[REDACTED]

303 North First Street, Apartment [REDACTED]  
Fairfield, Illinois 62837

[REDACTED]