

**IN THE CIRCUIT COURT  
FOR THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS**

STEFANI DONALDSON, TOM OLLER, )  
FAITH ROBINSON, CHRIS STEVENS, )  
STEPHANIE STOYANOFF, MELISSA )  
TEBBE, CHRISTINA BECKER, VICKI )  
BRIDGES, JESSICA GREEN, AMBER )  
STEVENS. )

Plaintiffs, )

VS. )

Case No. 2021-MR-\_\_\_\_\_

EDWARDSVILLE COMMUNITY )  
UNIT DISTRICT #7, a body )  
politic and corporate, PATRICK )  
SHELTON, as Superintendent of )  
EDWARDSVILLE COMMUNITY )  
DISTRICT #7, TRIAD COMMUNITY )  
UNIT #2, a body politic and corporate, )  
LEIGH LEWIS as Superintendent of )  
TRIAD COMMUNITY UNIT #2 )

Defendants. )

**FIRST AMENDED PETITION FOR DECLARATORY RELIEF  
AND FOR WRIT OF INJUNCTION**

COMES NOW Plaintiffs, STEFANI DONALDSON, TOM OLLER, FAITH ROBINSON, CHRIS STEVENS, STEPHANIE STOYANOFF, MELISSA TEBBE, (Donaldson through Tebbe are collectively referred to as the “Edwardsville Educators”) and CHRISTINA BECKER, VICKI BRIDGES, JESSICA GREEN, AMBER STEVENS, (Becker through Stevens are collectively referred to as the “Triad Educators”) by and through their attorney, Thomas G. DeVore of the Silver Lake Group, Ltd., and for their First Amended Petition for Declaratory Relief and for Writ of Injunction against Defendants, TRIAD COMMUNITY UNIT #2 (“Triad District”), a body politic and corporate, and LEIGH LEWIS (“Lewis”), as Superintendent of TRIAD COMMUNITY

UNIT #2, EDWARDSVILLE COMMUNITY UNIT DISTRICT #7 (“Edwardsville District”), a body politic and corporate, PATRICK SHELTON (“Shelton”), as Superintendent of EDWARDSVILLE COMMUNITY DISTRICT #7, and hereby alleges as follows:

**PARTIES**

1. The Edwardsville Educators are teachers in the Edwardsville District.
2. The Triad Educators are teachers in the Triad District.
3. The Edwardsville District, is a body politic and corporate, organized under the laws of the State of Illinois.
4. Defendant, Shelton, is the current Superintendent of The Edwardsville District.
5. The Triad District, is a body politic and corporate, organized under the laws of the State of Illinois.
6. Defendant, Lewis, is the current Superintendent of The Triad District.

**FACTUAL BASIS**

7. The Edwardsville District has published a back-to-school plan. (hereinafter referred to as the “Edwardsville Mask Plan”) (See Exhibit A)
8. The Edwardsville Mask Plan includes the use of a mask for students, staff, and visitors, when on school property and inside the facilities, as a device to allegedly limit the spread of infectious disease. (See Exhibit A)
9. The Edwardsville District has published a vaccination or test plan. (hereinafter referred to as the “Edwardsville Vaccination Plan”) (See Exhibit B)
10. The Edwardsville Vaccination Plan requires the Edwardsville Educators to either be vaccinated or submit to testing or each may be excluded from the premises and prohibited from performing their duties.

11. The Triad District has published a back-to-school plan. (hereinafter referred to as the “Triad Mask Plan”) (See Exhibit C)
12. The Triad Mask Plan includes the use of a mask for students, staff, and visitors, when on school property and inside the facilities, as a device to allegedly limit the spread of infectious disease. (See Exhibit C)
13. The Triad District has published a vaccination or test plan. (hereinafter referred to as the “Triad Vaccination Plan”) (See Exhibit D)
14. The Triad Vaccination Plan requires the Triad Educators to either be vaccinated or submit to testing or each may be excluded from the premises and prohibited from performing their duties.
15. At this time, all Triad and Edwardsville Educators are not positive for the COVID-19 virus, or any other infectious disease, and are not currently exhibiting any symptoms consistent with the COVID-19 virus or any other infectious disease.

#### **RELEVANT LEGAL AUTHORITY**

16. The State Department of Public Health has general supervision of the interests of the health and lives of the people of the State. It has supreme authority in matters of quarantine and isolation, and may declare and enforce quarantine and isolation when none exists, and may modify or relax quarantine and isolation when it has been established. (See 20 ILCS 2305(a)).
17. Except as provided in this Section, no person or a group of persons may be ordered to be quarantined or isolated and no place may be ordered to be closed and made off limits to the public except with the consent of the person or owner of the place or upon the prior order of a court of competent jurisdiction. The

Department may, however, order a person or a group of persons to be quarantined or isolated or may order a place to be closed and made off limits to the public on an immediate basis without prior consent or court order if, in the reasonable judgment of the Department, immediate action is required to protect the public from a dangerously contagious or infectious disease. In the event of an immediate order issued without prior consent or court order, the Department shall, as soon as practical, within 48 hours after issuing the order, obtain the consent of the person or owner or file a petition requesting a court order authorizing the isolation or quarantine or closure. When exigent circumstances exist that cause the court system to be unavailable or that make it impossible to obtain consent or file a petition within 48 hours after issuance of an immediate order, the Department must obtain consent or file a petition requesting a court order as soon as reasonably possible. To obtain a court order, the Department, by clear and convincing evidence, must prove that the public's health and welfare are significantly endangered by a person or group of persons that has, that is suspected of having, that has been exposed to, or that is reasonably believed to have been exposed to a dangerously contagious or infectious disease including non-compliant tuberculosis patients or by a place where there is a significant amount of activity likely to spread a dangerously contagious or infectious disease. The Department must also prove that all other reasonable means of correcting the problem have been exhausted and no less restrictive alternative exists. (See 20 ILCS 2305(c)).

18. The Department may order physical examinations and tests and collect laboratory

specimens as necessary for the diagnosis or treatment of individuals in order to prevent the probable spread of a dangerously contagious or infectious disease. Physical examinations, tests, or collection of laboratory specimens must not be such as are reasonably likely to lead to serious harm to the affected individual. To prevent the spread of a dangerously contagious or infectious disease, the Department may, pursuant to the provisions of subsection (c) of this Section, isolate or quarantine any person whose refusal of physical examination or testing or collection of laboratory specimens results in uncertainty regarding whether he or she has been exposed to or is infected with a dangerously contagious or infectious disease or otherwise poses a danger to the public's health. An individual may refuse to consent to a physical examination, test, or collection of laboratory specimens. An individual shall be given a written notice that shall include notice of the following: (i) that the individual may refuse to consent to physical examination, test, or collection of laboratory specimens; (ii) that if the individual consents to physical examination, tests, or collection of laboratory specimens, the results of that examination, test, or collection of laboratory specimens may subject the individual to isolation or quarantine pursuant to the provisions of subsection (c) of this Section; (iii) that if the individual refuses to consent to physical examination, tests, or collection of laboratory specimens and that refusal results in uncertainty regarding whether he or she has been exposed to or is infected with a dangerously contagious or infectious disease or otherwise poses a danger to the public's health, the individual may be subject to isolation or quarantine pursuant to the provisions of subsection (c) of this Section; and (iv) that if the individual

refuses to consent to physical examinations, tests, or collection of laboratory specimens and becomes subject to isolation and quarantine as provided in this subsection (d), he or she shall have the right to counsel pursuant to the provisions of subsection (c) of this Section. To the extent feasible without endangering the public's health, the Department shall respect and accommodate the religious beliefs of individuals in implementing this subsection. (See 20 ILCS 2305(d))

19. The Department may order the administration of vaccines, medications, or other treatments to persons as necessary in order to prevent the probable spread of a dangerously contagious or infectious disease. A vaccine, medication, or other treatment to be administered must not be such as is reasonably likely to lead to serious harm to the affected individual. To prevent the spread of a dangerously contagious or infectious disease, the Department may, pursuant to the provisions of subsection (c) of this Section, isolate or quarantine persons who are unable or unwilling to receive vaccines, medications, or other treatments pursuant to this Section. An individual may refuse to receive vaccines, medications, or other treatments. An individual shall be given a written notice that shall include notice of the following: (i) that the individual may refuse to consent to vaccines, medications, or other treatments; (ii) that if the individual refuses to receive vaccines, medications, or other treatments, the individual may be subject to isolation or quarantine pursuant to the provisions of subsection (c) of this Section; and (iii) that if the individual refuses to receive vaccines, medications, or other treatments and becomes subject to isolation or quarantine as provided in this subsection (e), he or she shall have the right to counsel pursuant to the provisions

of subsection (c) of this Section. To the extent feasible without endangering the public's health, the Department shall respect and accommodate the religious beliefs of individuals in implementing this subsection. (See 20 ILCS 2305(e)).

20. Dr. Ezike, the Director of the Illinois Department of Public Health, has proclaimed that vaccinations and masks are equally effective medical treatments to prevent the spread of COVID-19.<sup>1</sup>
21. The Department may order observation and monitoring of persons to prevent the probable spread of a dangerously contagious or infectious disease. To prevent the spread of a dangerously contagious or infectious disease, the Department may, pursuant to the provisions of subsection (c) of this Section, isolate or quarantine persons whose refusal to undergo observation and monitoring results in uncertainty regarding whether he or she has been exposed to or is infected with a dangerously contagious or infectious disease or otherwise poses a danger to the public's health. An individual may refuse to undergo observation and monitoring. An individual shall be given written notice that shall include notice of the following: (i) that the individual may refuse to undergo observation and monitoring; (ii) that if the individual consents to observation and monitoring, the results of that observation and monitoring may subject the individual to isolation or quarantine pursuant to the provisions of subsection (c) of this Section; (iii) that if the individual refuses to undergo observation and monitoring and that refusal results in uncertainty regarding whether he or she has been exposed to or is

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<sup>1</sup> <https://www.wjbc.com/2021/09/01/dr-ezike-on-masks-and-vaccines/> ; <https://www.foxnews.com/us/illinois-health-dept-director-masks-vaccines>

infected with a dangerously contagious or infectious disease or otherwise poses a danger to the public's health, the individual may be subject to isolation or quarantine pursuant to the provisions of subsection (c) of this Section; and (iv) that if the individual refuses to undergo observation and monitoring and becomes subject to isolation or quarantine as provided in this subsection (f), he or she shall have the right to counsel pursuant to the provisions of subsection (c) of this Section. (See 20 ILCS 2305(e))

22. Mandatory mask requirements are by definition a type of monitoring under the health code. (See Ill. Adm. Code 690.10)
23. An individual may refuse to consent to a physical examination, test, or collection of laboratory specimens, but shall remain subject to isolation or quarantine, provided that, if those persons are isolated or quarantined, they may request a hearing in accordance with this Subpart. (See Ill. Adm. Code 690.1380(d))
24. An individual may refuse to receive vaccinations, medications, or other treatments, but shall remain subject to isolation or quarantine, provided that, if the individual is isolated or quarantined, he or she may request a hearing in accordance with this Subpart. (See Ill. Adm. Code 690.1385(e))
25. An individual may refuse to undergo observation or monitoring, but shall remain subject to isolation or quarantine, provided that, if an individual is isolated or quarantined, he or she may request a hearing in accordance with this Subpart. (See Ill. Adm. Code 690.1390(f))
26. In accordance with Section 2310-15 of the Department of Public Health Powers



and Duties Law, the Department has the general authority to delegate to a certified local health department, for the purpose of local administration and enforcement, the duties that the Department is authorized to enforce. Due to the need for immediate action to respond to a threat of a dangerously contagious or infectious disease, the Department delegates its powers to issue orders for isolation, quarantine or closure; physical examinations and tests; collection of specimens; administration of vaccines, medications and treatments; and observation and monitoring and to issue and enforce orders to certified local health departments within the State of Illinois. (See Ill. Adm. Code 690.1310(c))

COUNT I  
DECLARATORY JUDGMENT

27. The Triad and Edwardsville Educators restate and incorporate by reference Paragraphs 1 through 26 as though fully set forth herein.
28. The Triad and Edwardsville Educators have a right to insist they not be compelled to vaccinate or undertake other medical treatments, undergo testing, or monitoring to allegedly prevent the spread of an infectious disease, except as provided by law.
29. The Edwardsville District and the Triad District have no legal authority to compel the Edwardsville and Triad Educators to vaccinate or undertake other medical treatments, undergo testing, or monitoring, to allegedly prevent the spread of an infectious disease as they are not the Illinois Department of Health or the Certified Local Health Departments.
30. Nonetheless, the Edwardsville District and the Triad District have adopted policies which mandate the Edwardsville and Triad Educators be vaccinated or undergo

testing, as well as wear masks, to allegedly prevent the spread of an infectious disease.

31. Should the Edwardsville and Triad Educators refuse to vaccinate or be tested, or refuse to wear a mask, he or she is excluded from the facilities and prohibited from the free performance of their educating responsibilities.
32. The legislative branch of government has delegated authority to seek vaccination or other medical treatments, undergo testing, or monitoring of citizens of the state only to the Illinois Department of Health, which has lawfully delegated it to the Certified Local Health Departments.
33. The Illinois Department of Health and the Certified Local Health Department must comply with the procedural and substantive due process requirements which the law affords to the Triad and Edwardsville Educators pursuant to 20 ILCS 2305(c)(d)(e)(f).
34. The Edwardsville District and the Triad District are prohibited under Illinois law to wield any authority of the Illinois Department of Health and the Certified Local Health Department. (See 20 ILCS 2310/2310-15)
35. Additionally, *en arguendo*, even if the Edwardsville District and the Triad District had authority to require vaccination or other medical treatments, require testing, or monitoring, they could not disregard the procedural and substantive due process rights which are afforded the Triad and Edwardsville Educators under Illinois law.
36. In this cause, at all times relevant, the Certified Local Health Department has taken no action averring the Triad and Edwardsville Educators have, or may have been exposed to a contagious disease.

37. Any rule or regulation, in regard to vaccination or other medical treatments, testing, or monitoring, which the Triad and Edwardsville Districts might rely upon which conflicts with the relevant referenced provisions of 20 ICLS 2305 *et seq.* would be a nullity.
38. The Edwardsville District and the Triad District are not the Illinois Department of Health or the Certified Local County Health Department.
39. Should the Illinois Department of Health, or the Certified Local County Health Department, desire to compel the Triad and Edwardsville Educators to vaccinate or other accept other medical treatments, undergo testing, or monitoring, this could only be sought by following procedural and substantive due process requirements under 20 ILCS 2305 *et seq.*, as well as the rules and regulations adopted within 77 Ill. Adm. Code 690 *et seq.* which are not otherwise inconsistent with 20 ILCS 2305 *et seq.*
40. Due process requires consent of the Triad and Edwardsville Educators or compliance under 20 ILCS 2305(c)(d)(e)(f) before vaccination or testing, as well as compulsory mask wearing, could ever be sought of them. <sup>2</sup>
41. It would be an absurd proposition that the Edwardsville District and the Triad District could lawfully compel the Triad and Edwardsville Educators to vaccinate and to wear a mask as medical treatments, or submit to testing, in order to limit the spread of an infectious disease without any procedural and substantive due process safeguards in place, but if the Illinois Department of Health or the Certified Local County Health Department were to try and require the same of the Triad and

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<sup>2</sup> Under the law, the Educators have a lawful right to refuse to vaccinate, test, or monitor. Should they refuse, the health department might subject them to an order of isolation or quarantine but to do so would require due process.

Edwardsville Educators, these administrative bodies who are vested with the supreme authority on these matters would be required to comply with the statutory due process safeguards within 20 ILCS 2305(c)(d)(e)(f).

42. Quite simply, the Edwardsville District and the Triad District are infringing upon the lawful right of the Triad and Edwardsville Educators to be free to choose for themselves what health and safety measures they feel are appropriate, absent their consent or an order from this Honorable Court to the contrary as might be allowed under Illinois law.
43. An actual controversy exists between the parties in regard to the authority of Edwardsville District and the Triad District to compel the Triad and Edwardsville Educators to be vaccinated or submit to testing as well as compel the use of a mask, which is all alleged to prevent the spread of an infectious disease.
44. An immediate and definitive determination is necessary to clarify the rights and interests of all parties affected.

WHEREFORE, the Edwardsville and Triad Educators herein request that this court enter an Order:

- A. Declaring the Certified Local Health Department or the Illinois Department of Health, and not the Edwardsville District and the Triad District, is vested with the authority to try and compel the Edwardsville and Triad Educators to vaccinate, to purportedly to limit the spread of an infectious disease;
- B. Declaring the Certified Local Health Department or the Illinois Department of Health, and not the Edwardsville District and the Triad District, is vested with the authority to try and compel the Edwardsville and Triad Educators to undergo

masking or other medical treatments, to purportedly to limit the spread of an infectious disease;

- C. Declaring the Certified Local Health Department or the Illinois Department of Health, and not the Edwardsville District and the Triad District, is vested with the authority to try and compel the Edwardsville and Triad Educators to undergo testing to purportedly to limit the spread of an infectious disease;
- D. Declaring the Edwardsville District and the Triad District, absent consent of the Edwardsville and Triad Educators, must have in their possession a lawful order of court in favor of the Certified Local Health Department or the Illinois Department of Health, before the Edwardsville and Triad Educators could ever be compelled to vaccinate before being allowed entry onto school premises to perform their educational responsibilities;
- E. Declaring the Edwardsville District and the Triad District, absent consent of the Edwardsville and Triad Educators, must have in their possession a lawful order of court in favor of the Certified Local Health Department or the Illinois Department of Health, before the Edwardsville and Triad Educators could ever be compelled to undergo masking, or other medical treatments, before being allowed entry onto school premises to perform their educational responsibilities;
- F. Declaring the Edwardsville District and the Triad District, absent consent of the Edwardsville and Triad Educators, must have in their possession a lawful order of court in favor of the Certified Local Health Department or the Illinois Department of Health, before the Edwardsville and Triad Educators could ever be compelled to undergo testing, before being allowed entry onto school premises to perform

their educational responsibilities;

- G. That the Court grant such other and further relief as is just and proper.

### **REQUEST FOR INJUNCTION**

45. Plaintiff restates and incorporate by reference Paragraphs 1 through 44 as though fully set forth herein.
46. The Edwardsville and Triad Educators have a right insist they not be compelled to vaccinate or submit to testing, as well as compelled to wear a mask, to purportedly limit the spread of an infectious disease unless they are first afforded the procedural and substantive safeguards within 20 ILCS 2305(c)(d)(e)(f).
47. There can be no doubt the Edwardsville District and the Triad District are attempting to compel the Edwardsville and Triad Educators to vaccinate or submit to testing, as well as compelled to wear a mask, to try and limit the spread of the COVID-19 virus.
48. The Illinois legislature has delegated to the Illinois Department of Health supreme authority on matters regarding vaccination or other medical treatments, testing, and monitoring.
49. The Illinois Legislature only allows that authority to be delegated to Certified Local Health Departments which the Illinois Department of Health has done.
50. The Edwardsville District and the Triad District have no authority to compel the Edwardsville and Triad Educators to vaccinate or submit to testing, or be compelled to wear a mask, under any circumstances to allegedly protect the public health from the spread of an infectious disease.
51. Illinois law provides the Edwardsville and Triad Educators may refuse to submit to

vaccination or other medical treatments, testing, and monitoring, and the law further provides procedural and substantive due process rights protect this choice before any action can be taken against them.

52. Under Illinois law, the only action which can be taken against the Triad and Edwardsville Educators for refusing to submit to vaccination or masks as medical treatments, or submitting to testing, is isolation or quarantine of their person, and that can only be accomplished after due process of law is provided.
53. The Edwardsville District and the Triad District have adopted policies compelling the vaccination or testing, and compulsory mask wearing, to allegedly prevent the spread of an infectious disease.
54. The Edwardsville District and the Triad District have no lawful authority to compel the Edwardsville and Triad Educators the submit to vaccination or testing, and compulsory mask wearing, to allegedly prevent the spread of an infectious disease.
55. Further, the Edwardsville District and the Triad District have no authority to exclude the Triad and Edwardsville Educators from their premises and deny them their employment, and opportunity to educate their students, for not complying with these unlawful mandates.
56. The Edwardsville District and the Triad District are not the Illinois Department of Health or the Certified Local County Health Department.
57. Even if the Illinois Department of Health or the Certified Local County Health Department desired to compel the Edwardsville and Triad Educators to be vaccinated or wear a mask as medical treatments, or submit to testing, this could only be accomplished by consent of the Edwardsville and Triad Educators or an

order of this Honorable Court after being afforded procedural and substantive due process under 20 ILCS 2305(c)(d)(e)(f).

58. At no time, has the Illinois Department of Health or the Certified Local County Health Department sought an order in regard to vaccination or other medical treatments such as masking, testing or any type of monitoring, against the Edwardsville and Triad Educators through their consent or by order of this Honorable Court.
59. Quite simply, Edwardsville District and the Triad District have infringed upon the lawful right of the Edwardsville and Triad Educators to be free to choose for themselves what health and safety measures they feel are appropriate absent action being taken against them by the Illinois Department of Health or the Certified Local County Health Department.
60. The Edwardsville and Triad Educators have no adequate remedy at law in which to seek relief from the irreparable harm caused by the Edwardsville District and the Triad District for every day, even though they are otherwise perfectly healthy, are being unlawfully forced to submit to vaccination and compulsory mask wearing as medical treatments, or testing if not vaccinated, all alleged to prevent the spread of an infectious disease, by a unit of local government which has never been delegated such authority from the Illinois legislature.
61. If the Edwardsville and Triad Educators refuse to submit to vaccination or testing, and compulsory mask wearing, when present at the facilities of Edwardsville District and the Triad District, they are being wrongfully excluded from the premises and denied their right to attend to their employment and educate their



students.

62. If the Edwardsville and Triad Educators are in fact a danger to the public health such that they should be excluded from the premises for not submitting to vaccination or testing, and compulsory mask wearing, which is purported to limit the spread of an infectious disease, the Certified Local Health Department, or the Illinois Department of Health, are the only bodies of government vested with the duty and authority to obtain this compliance either by consent of the Edwardsville and Triad Educators or otherwise from this Honorable Court.
63. For all these reasons, balancing the equities in this cause bodes completely in favor of granting the Edwardsville and Triad Educators their requested relief.

WHEREFORE, the Edwardsville and Triad Educators herein request that this court enter an Order:

- A. Finding under the facts presented herein, the Edwardsville District and the Triad District, cannot compel the Edwardsville and Triad Educators to be vaccinated, as under Illinois Law this authority is only granted the Illinois Department of Health which was further lawfully delegated to the Certified Local Health Department.
- B. Finding under the facts presented herein, the Edwardsville and Triad Educators cannot be forced to vaccinate to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or procedural due process having been provided pursuant to 20 ILCS 2305(d);
- C. Finding under the facts presented herein, the Edwardsville District and the Triad District, cannot compel the Edwardsville and Triad Educators to submit to testing for an infectious disease, as under Illinois Law this authority is only granted the

Illinois Department of Health which was further lawfully delegated to the Certified Local Health Department.

- D. Finding under the facts presented herein, the Edwardsville and Triad Educators cannot be forced to submit to testing for an infectious disease to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or procedural due process having been provided pursuant to 20 ILCS 2305(e);
- E. Finding under the facts presented herein, the Edwardsville District and the Triad District, cannot compel the Edwardsville and Triad Educators to submit to the mandatory use of a mask, or any other medical treatment, as under Illinois Law this authority is only granted the Illinois Department of Health which was further lawfully delegated to the Certified Local Health Department.
- F. Finding under the facts presented herein, the Edwardsville and Triad Educators cannot be forced to submit to the mandatory use of a mask, or any other medical treatment, to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or procedural due process having been provided pursuant to 20 ILCS 2305(d) or 20 ILCS 2305(f);
- G. Entering an injunction against the Edwardsville District and the Triad District, barring them from compelling the Edwardsville and Triad Educators to be vaccinated to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or after order of court issuing in favor of the Certified Local Health Department, after procedural due process having been provided pursuant to 20 ILCS 2305(d);

- H. Entering an injunction against the Edwardsville District and the Triad District, barring them from compelling the Edwardsville and Triad Educators to undergo testing for an infectious disease to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or after order of court issuing in favor of the Certified Local Health Department, after procedural due process having been provided pursuant to 20 ILCS 2305(e);
- I. Entering an injunction against the Edwardsville District and the Triad District, barring them from compelling the Edwardsville and Triad Educators to submit to the mandatory use of a mask, or any other medical treatment, to purportedly to limit the spread of an infectious disease, absent consent of the Edwardsville and Triad Educators or after order of court issuing in favor of the Certified Local Health Department, after procedural due process having been provided pursuant to 20 ILCS 2305(d) or 20 ILCS 2305(f);
- J. Entering an injunction against the Edwardsville District and the Triad District barring them from excluding any of the Edwardsville and Triad Educators from the premises, or in any way interfering with the performance of their duties, for not complying with their respective Mask or Vaccination Plans.
- K. For such other relief as this Court deems just and proper.

Respectfully submitted,

By: /s/ Thomas Devore  
Thomas G. DeVore  
IL Bar Reg. No. 06305737  
**silver lake group ltd.**  
Attorneys for Plaintiff  
118 N. 2nd St.  
Greenville, IL 62246  
Telephone - 618-664-9439

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Stefani Donaldson

STEFANI DONALDSON

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Tom Oller

TOM OLLER

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Faith Robinson

FAITH ROBINSON

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Chris Stevens

CHRIS STEVENS

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Stephanie Stoyanoff

STEPHANIE STOYANOFF



### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Melissa Tebbe

MELISSA TEBBE

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Christina Becker

CHRISTINA BECKER

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Vicki Bridges

VICKI BRIDGES

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Jessica Green

JESSICA GREEN

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

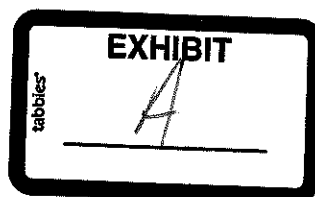
Date: September 22, 2021

By: /s/ Amber Stevens

AMBER STEVENS



***District #7***  
***Back To School***  
***Fall 2021***



Revised 8.2.21

## Executive Summary

In order to provide District #7 students with as much of a normal school day experience as possible, District #7 will be implementing a system of layered strategies which are shown to prevent the spread of viruses, including COVID-19. This includes encouraging vaccinations for those who are eligible, self-screening before attending school daily, universal masking at school, social distancing to the extent possible, implementing a district-wide testing system, and cleaning and sanitizing on a regular basis.

When these layered strategies are followed, students in District #7 will be able to reduce the need to quarantine and allow students to remain in school even if they are identified as a close contact to an individual who has tested positive for COVID-19.

Students who are absent from school due to COVID-19 will be provided with the opportunity to participate in remote instruction at identified times during the school day. When new content is being taught, both synchronous remote learning (through Zoom) as well as with asynchronous instruction (through Schoology or other modalities as necessary) will be utilized to allow students to maintain pace with their peers. *Remote instruction is only available to those students who are isolated or excluded from school due to COVID-19, and only for the time indicated by the health department.*

The district's goal is to provide a safe learning environment for students and staff in District #7, and be able to sustain that learning environment five days a week throughout the school year.

## **Introduction**

In March of 2020, the majority of the United States went into closure due to COVID-19. During the ensuing months, school districts across the country were faced with changing day-to-day operations from in-person to a combination of in-person, hybrid, and virtual learning while also working to mitigate the risk of the spread of COVID-19.

As a result of the pandemic, school districts were forced to make changes that significantly impacted the work of teachers, students, and the partnerships with parents in ways that were unprecedented. As we return to school in the fall of 2021, organizations across the country have changed the way in which they operate to meet the needs of new societal norms, continue practices which we have learned improve the way in which we function, and address areas which previously were known to be concerns but were put under a spotlight when viewed during a pandemic.

This fall, Edwardsville CUSD#7 will emerge from the COVID-19 Pandemic stronger and will approach education with an intentional purpose to learn from the experiences had by many in our community. This document is intended to provide stakeholders in our community with an update regarding practices which were put in place during the pandemic, but during a post-pandemic review, were identified as practices which should continue, be evaluated, or modified to improve the education provided to students and provide a safe environment for all students and staff in District #7.

## **School Day/Time**

The District #7 school day will return to scheduled times from the 2019-2020 school year for student and staff attendance as shown below:

Student times:

High School-Early Bird 6:30 a.m.-Regular School Day-7:20 a.m. to 1:50 p.m.

Middle School-8:00 a.m. to 2:45 p.m.

Primary and Intermediate Schools-9:15 a.m. to 3:30 p.m.

Principals in each building will communicate the times in which students may be dropped off at each school and the procedures for doing so.



## **Layered Mitigation Approach**

On July 26, the Illinois State Board of Education in cooperation with the Illinois Department of Public Health released guidance which reinforced and adopted the recommendations from the Centers for Disease Control (CDC) and provided additional clarification for school administrators on how to best maintain a safe environment for the 2021-2022 school year. The information states "The CDC's guidance is meant to help K-12 school administrators and local health officials select appropriate, layered prevention strategies in order to keep in-person learning environments safe for students and staff during times of fluctuating transmission."

This layered approach to implementing strategies which are shown to limit the spread of COVID-19 is important in helping District #7 achieve the goal of ensuring a safe learning environment for students and staff and allow five days a week of learning throughout the school year.

Each of the layers of intervention provides a different level of protection against the spread of COVID-19, and District #7 will continue to use school and community data regarding the spread of COVID-19 to add or remove layers of protection. These layers of intervention include:

- Vaccinations
- Masking
- Social Distancing
- Student Testing
- Contact Tracing and Exclusion
- Cohorting
- Cleaning and Sanitizing

Together, these layered strategies form a strong level of protection against the spread of COVID-19. Each of the strategies is defined below:

### **Promoting Vaccinations**

Vaccination is currently the leading public health prevention strategy to end the COVID-19 pandemic (CDC, 2021) Vaccinations are available for anyone 12 and over, and District #7 will continue to work with Madison County Health Department to provide opportunities for those who wish to be vaccinated to do so.

### **Masking**

"Masks for unvaccinated persons are the most effective measure to prevent transmission. The CDC strongly recommends that masks should be worn by all individuals (age 2 and older) who are not fully vaccinated when indoors and when in crowded outdoor settings or during activities that involve sustained close contact with other people who are not fully vaccinated, particularly

in areas of substantial to high transmission” (CDC, 2021). When masking is used as a strategy, students will be more likely to remain in school even if exposed to COVID-19.

### **Social Distancing**

“CDC recommends schools maintain at least 3 feet of physical distance between students within classrooms, combined with indoor mask wearing by people who are not fully vaccinated, to reduce transmission risk. Because of the importance of in-person learning, schools where not everyone is fully vaccinated should implement physical distancing to the extent possible within their structures (in addition to masking and other prevention strategies), but should not exclude students from in person learning to keep a minimum distance requirement.”

### **Student Testing**

There are two types of testing which can help limit the spread of COVID-19 in school: screening, or surveillance testing, and symptomatic testing.

According to the CDC, screening tests for SARS-CoV-2 can support in-person learning by identifying infected persons who are asymptomatic and without known or suspected exposure to SARS-CoV-2. Screening tests are performed to identify persons who may be contagious so that measures can be taken to prevent further transmission.

Additionally, testing can be used to keep students in school when identified as classroom close contact through the Test-to-Stay protocol. This allows students to avoid quarantine by testing on days one, three, five and seven after exposure as long as they continue to test negative.

Symptomatic Testing (Binax) is similar to a rapid test that one might receive at a local drug store or doctor's office. This testing, if made available to District #7 students, would allow symptomatic students to be tested soon after displaying symptoms, limiting the period of isolation which could be required.

Parents/Guardians in District #7 will have the opportunity to opt-in to surveillance (SHIELD) testing prior to the start of school, and permission must be provided explicitly to participate in symptomatic testing.

### **Contact Tracing and Exclusion**

Contact tracing is used by health departments to prevent the spread of infectious diseases. In general, contact tracing involves identifying people who have a confirmed or probable case of COVID-19 (cases) and people who they came in contact with (close contacts) and working with them to interrupt disease spread. This includes asking people with COVID-19 to isolate and their contacts to quarantine at home voluntarily.

Fully vaccinated persons who remain asymptomatic and those with documented COVID-19 infection within the past 90 days are excluded from quarantine. In Illinois, contact tracing in

combination with isolation and quarantine is required per Part 690 Control of Communicable Disease Code, Subpart I. Further, the Communicable Disease Code also requires mandatory reporting of any suspect, confirmed or probable case of COVID-19 to the local health department immediately (within 3 hours).

District #7 will continue to partner with Madison County Health Department to identify close contacts of individuals who are confirmed to be infected with COVID-19.

### **Sanitizing/Cleaning**

While we recognize that COVID-19 is not prevalently spread on surfaces, District #7 would like to continue to ensure that there are cleaning protocols in place to provide a healthy learning environment for students and staff. Classrooms will be cleaned and sanitized throughout the day and disinfected with approved COVID disinfectant. Routine cleaning will be performed on a regularly scheduled basis by district custodial staff assigned to that building or area. Routine cleaning will include daily cleaning and disinfecting through electrostatic spraying and/or manual cleaning methods of all restrooms, scheduled sweeping of all floors, sanitizing of cafeteria tables, emptying trash and other building based tasks.

Supplemental cleaning will be performed by either regular custodial staff, substitute custodial staff or temporary custodial staff assigned to perform cleaning over and above what is considered routine. Supplemental cleaning will be focused on cleaning and disinfecting high touch surfaces, specifically for the purpose of preventing the spread of COVID.

All employees will be strongly encouraged to perform daily area cleaning in their personal workspace, including their desk, telephone, keyboard, chair or any other items they use in performing their duties. This cleaning will be customized to personal preference and standards, and will be done utilizing district supplied cleaning products. Employees will have the ability to sanitize their work spaces through the use of liquid spray bottles that will be available in all classrooms.

## Quarantine Guidance

Based on the most recent guidance from the Illinois Department of Public Health (IDPH) and CDC, there is modified guidance for students who have been identified as close contacts of an individual who has tested positive for COVID-19. However, all close contacts will work through the Madison County Health Department (MCHD), and guidance is subject to change depending on current data indicating the level of community and/or school spread. Officials at MCHD will work closely with each school and each individual to determine the strategy for each individual situation. Students who are vaccinated will not be required to quarantine as a close contact at this time. Proof of vaccination will be required.

- Option 1: Quarantine at home for 14 calendar days. Date of last exposure is considered day 0.
- Option 2: Quarantine for 10 calendar days after the close contact's last exposure to the COVID-19 case. Date of last exposure is considered day 0.
  - The individual may end quarantine after day 10 if no symptoms of COVID-19 are developed during daily monitoring. SARS-CoV-2 PCR testing is recommended and may be required by the local health department.
  - The individual can maintain physical distancing and masking at all times when returning to school; for classrooms where masking is strictly adhered to, physical distance of 3 to 6 feet is acceptable for return.
- Option 3: Quarantine period is for seven calendar days after the last exposure if:
  - No symptoms developed during daily monitoring AND the individual has a negative SARS-CoV-2 diagnostic test (PCR) that was collected within 48 hours of exposure day 7 (starting on day 6 or after).
    - The individual is responsible for obtaining a copy of the negative results for documentation purposes.
  - The individual can maintain physical distancing and masking at all times when returning to school; for classrooms where masking is strictly adhered to, physical distance of 3 to 6 feet is acceptable for return.
- Option 4: Test-to-Stay Strategy, as has been documented by CDC, if schools test close contacts, as defined above, on days one, three, five, and seven from date of exposure by a PCR or rapid antigen or molecular emergency use authorization (EUA)-approved test, close contacts are permitted to remain in the classroom as long as the results are negative. (See IDPH's Interim Guidance on Testing for COVID-19 in Community Settings and Schools for specific details on testing in schools.)
  - Only applicable when both the COVID-19-confirmed student and close contact were engaged in consistent and correct use of well-fitting masks and the school requires masking for all individuals (age 2 and older) who are not fully vaccinated, as recommended by the CDC.
  - Test-to-Stay may be used for any indoor exposure, with the exception of household exposures.

## **Implementation of Prevention Strategies in District #7 Schools**

### **Universal Measures:**

All cleaning and sanitizing protocols previously described will be followed daily. Students will be encouraged to wash hands and/or sanitize frequently throughout the day. When in classrooms, students will be in assigned seats. When modified, seating charts will be updated and shared with building administrators.

When outside of the classroom, students will maintain a distance of 3' between each other whenever possible.

### **Elementary**

- Vaccinations: once vaccines become available for students under age 12, a vaccine will limit a student's exposure and ability to be named a close contact.
- Masking: Masks will be required for all students and staff. Students will not be required to wear masks at recess, and will be provided mask breaks upon request. No more than one student at a time will be allowed a mask break, and must be six feet from any other students when taking a mask break.
- Social Distancing: social distancing will be expected to the greatest extent possible in the classroom and other settings; however, students may be closer than 3' at times.
- Student Testing: Student screening for COVID-19 will be conducted in randomly selected classrooms. Parents will be provided with the opportunity to opt-in to participating in any kind of testing.
- Contact Tracing and Exclusion: Whenever the district is notified of an individual who tests positive for COVID-19, we will continue to notify the Madison County Health Department of others who were within proximity to be identified as a close contact.
- Cohorting: Students will be cohorted by classroom and assigned seats within the classroom to assist with identifying close contacts as necessary.

### **Middle School/High School**

- Vaccinations: once vaccines become available for students under age 12, a vaccine will limit a student's exposure and ability to be named a close contact.
- Masking: Masks will be required for all students and staff.
  - Middle School: Students will be provided mask breaks upon request. No more than one student at a time will be allowed a mask break, and must be six feet from any other students when taking a mask break.
  - High School: Students will be allowed to take a mask break during passing periods in the hallway, as long as they are able to distance and avoid congregating in the hallways.

- Social Distancing: social distancing will be expected to the greatest extent possible in the classroom and other settings; however, students may be closer than 3' at times.
- Student Testing: Student screening for COVID-19 will be conducted on an ongoing basis with students who are randomly selected. Parents will be provided with the opportunity to opt into participating in any kind of testing.
- Contact Tracing and Exclusion: Whenever the district is notified of an individual who tests positive for COVID-19, we will continue to notify the Madison County Health Department of others who were within proximity to be identified as a close contact.
- Assigned Seating: Students will be assigned to seats in the classroom in order to better identify any potential close contacts. Students will move from class to class following their daily schedule.

Each of the layered strategies mentioned for schools will be reevaluated on an ongoing basis as we continue to have data communicated from Madison County Health Department and evaluate the data from our schools.

## **Student Instruction During Quarantine/Isolation Due to COVID**

- Students subjected to exclusion due to contact with an individual who has tested positive for COVID AND individuals who have tested positive for COVID will be allowed to participate in remote instruction. Students who are subject to quarantine/isolation will be issued a device if needed. Remote instruction will be defined as:
  - Synchronous instruction at the elementary level for opening meeting, and reading, math or writing daily (as appropriate based on content areas and daily schedules), as well as the opportunity to meet with a teacher during scheduled “office hours”.
  - Synchronous instruction at the middle school level will occur for social-emotional learning (weekly), core content courses when new content is taught, and the opportunity to meet with teachers during scheduled “office hours”.
  - Synchronous instruction at the high school level will occur for core content courses anytime new content is taught, with additional opportunities to meet with teachers during scheduled “office hours”.
  - Synchronous instruction is the opportunity for the student to join the classroom via a zoom link; this will be an opportunity for students to be present for the delivery of information. Asynchronous instruction will also occur via Schoology for all grade levels. Students will have the opportunity to interact with teachers as needed during scheduled “office hours”.
- When students are affected by COVID either due to positive testing or exposure, students will be responsible for work assigned and submitting in an appropriate timeframe. Time for makeup assignments will be granted based on teacher discretion. Full credit will be provided based on timely submission of work.

## **Areas of School Management Impacted by COVID-19**

In addition to the layered mitigating strategies previously identified for each level, a number of steps taken during the 2020-2021 school year will be continued or modified to ensure a safe learning environment for students and staff.

## **Health Screenings**

Only students and staff who are healthy should report for in-person learning. Students will not be penalized for missing school and are encouraged to stay home when not feeling well. Students and staff with any of the following symptoms of COVID-19 must remain home:

1. Congestion or runny nose
2. Cough
3. Diarrhea
4. Fatigue
5. Fever or chills
6. Headache
7. Known close contact with a person who has been diagnosed with COVID-19
8. Measured temperature of 100.4° Fahrenheit or greater
9. Muscle or body aches
10. Nausea or vomiting
11. New loss of taste or smell
12. Shortness of breath or difficulty breathing
13. Sore throat

Any student or staff member who begins to exhibit a high fever associated with COVID-19-like symptoms must report to the designated area at the school, inform the school nurse, and follow the building procedure. Students who exhibit or report symptoms will be provided with the opportunity to schedule an appointment to be tested for COVID-19 using the Binax Rapid Test. Times and additional information will be communicated as they become available.

## **Outside Visitors**

Due to the number of individuals who are still unvaccinated, District #7 will not allow visitors to classrooms, cafeteria, or elsewhere within the school day. Permission may be provided for individuals who have the opportunity to positively influence the instructional environment of the school.

## **Breakfast/Lunch Protocols**

District #7 will offer a breakfast and lunch program to all K-12 students. Students will be directed to assigned seats and will be able to remove masks while eating. Participating students at grades K-8 will be assigned seats for breakfast and lunch and students will be distanced as space is available to do so. High school students will be seated according to lunch shifts, and encouraged to distance.

## **Transportation**

Per CDC Guidelines for public transportation, all students will be required to wear a mask when being transported on the bus. Students will also be required to sit in assigned seats.



### **Mask Breaks within the Classroom**

Each elementary/middle school teacher will be allowed to provide mask breaks to students on an individual basis as requested. When taking a mask break, students should be under adult supervision (as applicable) and should distance at least six feet from other students in the classroom. Only one student at a time should be allowed to be without a mask.

### **Morning Meeting (Elementary Grades)**

Prior to the 2020-2021 school year, students from their respective schools gathered in the gymnasium each morning to start the school day as a large community of learners.

For the 2021-2022 school year, students will be able to report to the classroom beginning at 9:05 a.m., and instruction will begin at 9:15 a.m. Building principals will establish drop-off procedures will allow students to safely enter the building and be in classrooms at the appropriate time.

### **Recess**

Designated areas (basketball, equipment, kickball, soccer, & 4-Square) will be identified for students to play during lunch recess per classroom.

### **Dismissal**

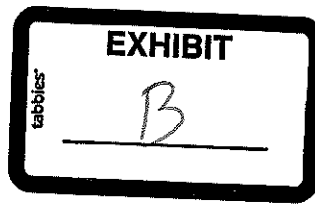
Students will be dismissed from classrooms following the last class period of the day. For the elementary level, dismissal will begin in sufficient time for students to be out of classrooms no later than 3:30 p.m. Students who utilize District #7 transportation will follow the procedures established by building administrators.

### **Grading**

Based on feedback from teachers, District #7 will evaluate the grading criteria/expectations for all specials classes (art, music and physical education), as well as science and social studies (in elementary grades).

### **Parent Conferences/IEP Meetings**

IEP Meetings, Parent/Teacher Conferences, and other meetings which include multiple stakeholders will occur as scheduled. Participants will have the option to schedule meetings/conferences in person or via Zoom.



September 21, 2021

Dear District #7 Staff:

The Illinois State Board of Education released emergency rules for Executive Order 2021-20 which requires all district staff to begin the process of vaccination or submit to weekly testing.

- In accordance with the emergency rules from ISBE, beginning Monday, September 20, 2021, all District #7 employees should either:
  - **Present the required vaccination information to the District**
    - "Fully Vaccinated" means an individual who is vaccinated against COVID-19 two weeks after receiving the second dose in a two-dose series of a COVID-19 vaccine authorized for emergency use, licensed, or otherwise approved by the U.S. Food and Drug Administration ("FDA"), or two weeks after receiving a single-dose COVID-19 vaccine authorized for emergency use, licensed, or otherwise approved by the FDA.
    - Staff that have not yet reached fully vaccinated status, must submit to weekly testing until they have reached the status of fully vaccinated as defined above.
  - **Submit to weekly testing**
- Medical and Religious exemptions
  - Staff may submit a religious/medical exemption form to be reviewed
  - Staff must complete the form in its entirety and receive approval prior to September 23, 2021, in order to be fully considered for an exemption
- District employees who wish to submit to testing for the week of September 20 (and until SHIELD testing is established) may:
  - Complete testing with Northshore Clinical Laboratories at Liberty Middle School (testing is available Monday through Thursday from 3:30 – 7:00 p.m.); Results will automatically be provided to the District; or,
  - Complete testing at a healthcare provider selected by the employee. This option will require a negative test result submitted prior to the end of the day Friday, September 24, 2021. At this point in time, the District is requiring a negative PCR test for those individuals who choose to complete testing at separate facility. Results must be provided to Dr. Garrett via <https://www.surveymonkey.com/r/PS7FS9J>
- Beginning Monday, September 27, 2021, (provided SHIELD is up and ready):
  - Employees will have the opportunity to test at least once per week in each building in District #7 during the testing hours assigned for each building; or,
  - Employees can report to a separate building to complete testing; or,
  - Employees can complete testing with Northshore Clinical Laboratories at Liberty; or,
  - Complete testing at a healthcare provider selected by the employee.

All testing or proof of vaccination must be submitted by Friday, September 24, 2021, and weekly thereafter. School personnel who are not fully vaccinated may be permitted to enter or work at the school while they are awaiting the results of their weekly test unless you are currently experiencing symptoms. Schools shall exclude from the school premises for any school personnel who are not fully vaccinated against COVID-19 or in compliance with the weekly testing requirement. If you are determined to not be in compliance with your proof of vaccination or testing by the end of the workday on Friday,

September 24, 2021, you will be excluded from school grounds until you provide proof of vaccination or testing and will be issued a dock day.

If you have already provided your proof of vaccination record to your school nurse - thank you. If you still need to provide proof of vaccination, please do so using this link: <https://www.surveymonkey.com/r/PS7FS9J>

If you have further questions, please contact the personnel department.

Respectfully,

Adam Garrett, Ed.D.  
Assistant Superintendent

# Triad Community Unit School District #2

THIS PLAN IS TENTATIVE AND SUBJECT TO CHANGE BASED UPON  
CHANGING GUIDANCE/AND OR MANDATES FROM CDC/IDPH/ISBE.



## Introduction

Triad CUSD#2 will follow the Illinois Department of Public Health (IDPH), Illinois State Board of Education (ISBE) and Center for Disease Control (CDC) Prevention Guidelines for schools. As new guidance emerges, our layered prevention strategies and the FAQ items listed below may also change. At the July 2021 regular meeting the Board of Education supported the district administrators' approach to recognize differences of opinions and experiences related to COVID-19. It is important for the district to develop a plan that allows for flexibility to make decisions based on school and classroom conditions, available space and situational needs. While last year, a significant focus of the District's Return to Learn Plan involved remote instruction, the primary educational focus for 2021-22 is to keep all students safely learning **in-person**.

## Building Weekly COVID19 Data Collection

The chart below displays the number of confirmed, new COVID positive cases within each school for the current week.

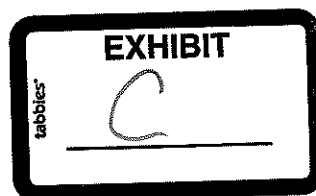
| New COVID+ Tests Reported (9/4 - 9/10) |       |          |
|--|-------|----------|
| School                                 | Staff | Students |
| CAH                                    | 0     | 2        |
| SCE                                    | 0     | 0        |
| STJ                                    | 0     | 2        |
| MGS                                    | 0     | 1        |
| TMS                                    | 0     | 4        |
| THS                                    | 0     | 4        |
| Totals                                 | 0     | 13       |

## Prevention Strategies

### 1. What sort of prevention strategies will the Triad District have in place to start the 2021-22 school year?

As was the case last school year, the Triad District will have multiple prevention strategies in place. Class sizes will remain small enough so that three feet of social distance should be maintained for the majority of classroom time. Lunchrooms will be organized so that students are at least three feet apart. Cohort groups (staying with the same group of students) will exist to the greatest extent possible. The layered mitigation measures that will be implemented and discussed in this FAQ include:

- Promoting vaccination
- Wearing of masks



- Physical distancing and reduced class sizes
- Contact Tracing in Combination with Isolation and Quarantine
- Staying home when sick and offering antigen and saliva-based screening programs
- Proper cleaning and disinfection
- Support for handwashing and respiratory etiquette

**2. Are these prevention strategies subject to change throughout the school year?**

Yes. The Triad District will continue to monitor the health and well-being of our students and staff as well as community transmission. The District will adjust accordingly if needed, and adjustments could include universal masking.

Strategies in this plan may be removed or revised based upon:

- Number of cases and transmissions in Triad Schools
- Number of students quarantined by the Madison County Health Department
- Local vaccine coverage
- Consultation with the Madison County Health Department
- Mandates/Directives from the State of Illinois or the Illinois State Board of Education

Currently, Madison County is in a period of high transmission, as reported by the CDC and the IDPH. If COVID outbreaks become more prevalent in our schools or in our communities, prevention strategies may be adjusted or added. Similarly, when transmission is low, prevention strategies may be adjusted or removed.

## **Vaccination**

**1. Does the District require vaccines for those students/staff who are eligible?**

The CDC and IDPH continue to promote vaccination as the leading health prevention strategy to end the COVID-19 pandemic. Vaccinated students and staff will not be required to quarantine even when they are a close contact to a positive COVID-19 individual. This means that vaccinated students can continue to attend school and participate in extracurricular activities even if they are a close contact to a COVID positive person.

**2. Will the district continue to host vaccination clinics in the future?**

The Madison County Health Department continues to promote vaccination as the leading health prevention strategy to end the COVID-19 pandemic. Vaccination remains the most effective way to keep our students safe and in-person throughout the school year and the District will continue to host vaccination clinics for those that are eligible (currently 12 years and older).

Triad is currently offering a COVID-19 Vaccination Clinic for both first and second Pfizer vaccine doses at THS on the following dates:

- July 28th from 3:30-7:30 PM (*completed*)
- Aug 18th from 3:30-7:30 PM

Families will be informed as additional vaccination clinics become available.

Eligible students must be accompanied by a parent or legal guardian. We will continue to work with the Madison County Health Department and offer future clinics at our schools as we anticipate the vaccine will become available for our younger populations. To schedule a vaccination appointment at Triad High

School or any other clinics in Madison County, please visit the Madison County Public Health Department website.

## **Masking**

**Following Governor Pritzker's announcement, effective immediately and until further notice, all students and staff PreK-12 in Triad Community Unit School District #2 will be required to wear face coverings/masks while indoors at school. - Updated: 8/5/21**

**1. Does the District require masks for students & staff?**

Wearing masks remains one of the mitigation strategies that the Triad District will continue to utilize. In the 2020-21 school year, masks were required at all times when indoors at school. As we begin the 2021-22 school year, masks will not be required at all times during the school day. However, masks are strongly encouraged per CDC and IDPH guidelines for all students and staff.

Everyone should bring a mask to school daily as situations may occur when it is not possible to maintain three feet of physical distance.

**2. Is there a difference between the mask policy between vaccinated and unvaccinated students and staff?**

No, masks are currently strongly encouraged per CDC and IDPH guidelines for all students and staff. Consistent and correct mask use by people (vaccinated and unvaccinated) is especially important indoors and in crowded settings, when physical distancing cannot be maintained.

**3. What are examples of situations where students will be required to wear a mask?**

Students may be asked by an adult to wear a mask for periods of time during the school day or extra-curricular activities **when three feet of physical distance cannot be maintained.**

The following are examples of the types of situations where students would be required to wear a mask:

- when completing a science lab where partners will be less than 3 feet apart for an extended period of time
- during whole group instruction if gathered together less than 3 feet apart on a floor mat
- when paired as partners or in a small group to complete an activity when it is not possible to maintain 3 feet of physical distance
- in high school where a class size is too large to maintain 3 feet of physical distance

When 3 feet of physical distance can be maintained, masks will be recommended, but not required.

**Please note that unless exempt by CDC Order, masks are required for all passengers and drivers while on a school bus.**

**4. Can my student wear a mask at all times while at school?**

Yes. Although not required, students are allowed to wear masks at all times while at school. At the K-6 level, parents can request that their student be placed in a classroom where mask wearing will be more frequent and where the majority of students will be wearing masks throughout the day.

Triad is committed to promoting a positive culture of respect for all students. Any negative comments or bullying due to the decision to wear a mask or not will be dealt with in a timely and serious manner. Every individual will be respected in their decision. Bullying will not be tolerated.

### **Physical Distancing**

#### **1. Will students be able to maintain the CDC physical distancing guidelines at school?**

A primary prevention strategy for all students is to continue to practice physical (social) distancing. The CDC and IDPH have updated guidance and are advising schools when possible to maintain 3 feet of distance between students. At the elementary level, the District will continue to keep class sizes small in an effort to maintain three feet of physical distance in most situations. Even at the middle and high school levels where students may be vaccinated, the District has made efforts to keep class sizes under 25 in order for students and staff to be physically distanced more than 3 feet in most situations. In addition, cafeterias and other common spaces will be arranged in order for students to maintain 3 feet of distance whenever possible. Visual reminders for physical distancing will be posted throughout school buildings.

**2. What are the physical distancing rules if a student is a close contact to a COVID positive individual?**

While the CDC and IDPH recommend schools maintain at least 3 feet of physical distance between students within classrooms, current guidance still states that a distance of 6 feet remains in place for determining close contacts. The District will consider the following prevention strategies when identifying close contacts per CDC and IDPH guidelines:

- Students who are vaccinated will not be identified as close contact (unless symptomatic).
- Students who are masked and within 3-6 feet distance to a masked COVID positive student will not be identified as close contact (unless symptomatic).

**Contact Tracing in Combination with Isolation and Quarantine**

**1. How are close contacts determined at school?**

The local health department will make the final determination on who is to be quarantined and for how long. In general, contact tracing involves identifying people who have come in close contact with a person who has a confirmed or probable case of COVID-19. Per current IDPH guidelines, people with COVID-19 are asked to isolate and close contacts are asked to voluntarily quarantine at home. Fully vaccinated persons who remain asymptomatic and those with documented COVID-19 infection within the past 90 days are excluded from quarantine.

Keeping students learning in-person at school is a primary focus of the District's Return to Learn Plan.

**2. What are the current close contact quarantine procedures?**

**COVID Exposure Outside the School:**

When a COVID exposure occurs outside the school environment, the district will adhere to the Madison County Health Department requirement of a 14 day quarantine before returning to school (date of last exposure is considered day 0). The health department will send the parent/guardian a release letter by email when their child is released from quarantine at the end of the 14th day. The email release should be forwarded to the school nurse prior to returning to school.

Families are encouraged to contact MCHD if not contacted - their phone number is (618) 692-8954. Schools must follow the State of Illinois and Centers for Disease Control and Prevention (CDC) Guidance for COVID-19 Prevention in P-12 Schools.

**COVID Exposure Within the School:**

Proper and consistent masking and maintaining 3 ft of social distancing will prevent student quarantine due to exposure within the school setting. When a COVID exposure does occur within the school environment, the district will coordinate with Madison County Health department to determine the length of quarantine. The quarantine period may be modified if certain criteria are met. When COVID exposures occur at school, school personnel are able to determine the degree of exposure such as distance and length of time of exposure, as well as strict adherence to proper mask wearing and at least 3 ft of distance.



### Modified Quarantine:

A physician's note is required. A student may quarantine for 10 calendar days after the last exposure to the COVID-19 case. Close contacts may be released on day 10 (date of last exposure is considered day 0)... if the student remains asymptomatic during his/her quarantine and a release note from the healthcare provider is obtained and sent to the school health office prior to returning. This option is only available for asymptomatic close contacts. If the student develops symptoms during the modified quarantine period, the student should be tested and if positive begin to serve the 10-day isolation period. If negative, the students must be symptom free before returning to school.

### Screening & Testing Programs

#### **1. Does the District require health screenings for students & staff for COVID-19?**

Only students and staff who are healthy should report for in-person learning. Students and staff who have symptoms of any infectious illness, such as influenza (flu) or COVID-19, should stay home and contact their healthcare provider for testing and care. Students will not be penalized for missing school and are encouraged to stay home when not feeling well. Students and staff with any of the known symptoms of COVID-19 must remain home. The District will not be requiring evidence (electronic notification, lanyards, temperature screening, etc.) confirming that a self-health check has been completed to enter a school.

#### **2. How will the District handle students reporting mild symptoms or chronic symptoms of COVID-19 this school year?**

One significant change for the 2021-22 school year is that students that are exhibiting mild COVID symptoms at school will not automatically be excluded due to the fact that the symptoms of COVID-19 are also symptoms of common illnesses like seasonal allergies and colds. Students with chronic conditions like asthma or allergies might have symptoms such as nasal congestion or cough without an infectious illness. To balance these considerations and to prevent potentially excluding students repeatedly, the list of symptoms has been limited to those most likely to be part of an infectious syndrome. Upon receiving parent permission, District school nurses will also be able to administer a BinaxNOW COVID-19 Antigen rapid test for symptomatic students. If the results of this test are negative for COVID, the student may be allowed to stay in school.

#### **3. What types of COVID screening/tests are offered by the District?**

The District will be able to provide two types of COVID tests as an additional mitigation measure for all students--but specifically for those that are not vaccinated.

- The BinaxNOW test is an antigen test that looks for the presence of a specific viral antigen that suggests someone is currently infected with COVID-19. Test samples are collected through a nasal swab and results are available in 15 minutes. Upon receiving parent permission, this test can be administered at school by a Triad school nurse. Because antigen tests perform best in symptomatic people and within a certain number of days since symptom onset, antigen tests are used frequently on people who are symptomatic. (BinaxNOW FAQ and Consent to Participate)
- SHIELD IL is a COVID screening program designed by University of Illinois to assist schools in identifying asymptomatic cases and preventing outbreaks. This screening targets specific COVID (PCR) markers and can be used to detect the presence of COVID for individuals who are displaying symptoms or who are asymptomatic. The test is a non-invasive, saliva-based collection that is self administered at each supervised school site. Weekly saliva samples are collected, transported, and analyzed by a CLIA-certified lab partner (MedCall Health Care) and

results are provided in less than a 24 hour period. You can read more about it at <https://www.uillinois.edu/shield> to review additional details. (Shield IL FAQ and Opt-In Details)

**4. Are there any costs to the District associated with administering the either COVID test?**

No. Madison County School Districts including Triad receive the BinaxNOW antigen tests free of charge from the Madison County Health Department. The Triad District receives the SHIELD IL screening service free through the State of Illinois. Triad receives no additional financial benefit or revenue from administering either the BinaxNow or the SHIELD IL screening tests.

**5. What are the potential benefits of the BinaxNOW antigen test?**

- Rapid confirmation of suspected COVID-19 for those showing symptoms
- Allows those showing mild COVID symptoms to remain at school and safely return to the classroom with a negative result.
- Helps your child's healthcare provider make a timely, informed decision about your child's plan of care.
- Helps mitigate the spread of COVID-19 in school and community

**6. What are the potential benefits for the SHIELD IL saliva test in schools?**

- PCR confirmation of COVID-19 for those that are not yet displaying COVID symptoms
- Identify infected people before the development of symptoms that are able to transmit the virus to others and limit the number of students who must be excluded from school.
- Repeated weekly to prevent the spread of COVID-19 in the school and prevent loss of instructional time with classroom outbreaks.
- Helps your child's healthcare provider make a timely, informed decision about your child's plan of care.
- Provide peace of mind for families to have students attend school in-person--specifically for those that worry about students bringing COVID-19 from school to home.

**Proper Cleaning & Disinfection**

**1. Does the District plan to continue cleaning procedures utilized last school year?**

Yes. Similar to last school year, classrooms will be cleaned and sanitized daily and disinfected with an approved EPA disinfectant. Disinfectant application through electrostatic spraying and manual cleaning methods will also be conducted routinely in all building spaces. Custodial staff will continue to sanitize work spaces and other common touchpoints, such as door handles, countertops and electronics.

**Handwashing & Respiratory Etiquette**

**1. Does the District plan to continue providing masks, hand sanitizers, handwashing stations, and personal protective equipment as appropriate?**

Yes. Masks, frequent hand washing and hand sanitizing will help prevent the spread of COVID-19 and will be made available to staff and students. The district has equipped all classrooms and entryways with an alcohol-based hand sanitizer that contains 80% alcohol that can be used. Staff and students will participate in training activities provided by the district nursing staff related to physical distancing,

face covering, and hand hygiene procedures. Hand hygiene and physical distancing will be included in the curriculum to help educate students on the importance of proper hand hygiene.

## **Resources**

\_\_\_\_\_ Our approach to mitigating risk to our students/staff this fall uses the following resources:

- [Guidance for COVID-19 Prevention in K-12 Schools - CDC](#)
- [Guidance for COVID-19 Prevention in K-12 Schools - IDPH](#)
- [FAQ on the Centers for Disease Control and Prevention \(CDC\) updated guidance - 7/26/21](#)
- [Shield IL Website](#)
- [Abbott - BinaxNow Test](#)

## **Operational Procedures**

### **Food Service/Cafeteria**

**1. Are all students eligible to receive a free breakfast and lunch like last year?**

Yes. Students who arrive at their assigned school at least 15 minutes prior to school starting can choose to eat breakfast in the cafeteria or assigned eating area. If a bus arrives late, students will be given time to eat breakfast. Students who do not bring their lunch to school are eligible for a free school lunch. In addition to the free breakfast and lunch, a limited number of Ala Carte items may be available for purchase.

**2. Will students be served breakfast and lunch at school?**

Yes. Breakfast and lunch will be served for all grade levels K-12 during the 2021-22 school year. Triad will maximize physical distance when students are eating at school. Schools will use other spaces indoors and outdoors to maximize physical distancing when feasible.

### **Building Visitors**

**1. Will visitors be allowed to enter a school building?**

Nonessential visitors, volunteers, and activities involving external groups or organizations with people will continue to be discouraged from visiting schools. Visitors will be restricted to essential personnel only during the school day. All visitors to a school should be prepared to wear a mask when indoors.

**2. Will parents be allowed in the building for drop off and pick up times at the K-6 level?**

No, similar to last year parents will not be allowed to gather and enter the school buildings during drop off and pick up times.

### **Comments and Questions**

Can be shared via email at: [triad.news@tcusd2.org](mailto:triad.news@tcusd2.org).

----- Forwarded message -----

From: **Kennan Fagan** <[kennan.fagan@tcusd2.org](mailto:kennan.fagan@tcusd2.org)>

Date: Tue, Sep 7, 2021 at 2:37 PM

Subject: Executive Order Update - Change in effective date

To:

At close to 3:00 PM last Friday, Governor Pritzker announced the vaccine mandate or alternative testing protocol to go into effect the week of September 19th -- not this week. We welcome the additional time to allow employees time to either sign up for their first dose of the vaccine or to sign up for Shield IL testing. To date, you are on the list to follow a routine testing schedule each week. If you receive your first dose of the vaccine before September 19th, please show proof of your vaccination to your building administrator.

Even though the delay in the testing protocol is set for the week of September 19th, Triad will offer testing on Friday, September 10th. Testing is not mandatory on the 10th. We encourage testing on September 10th as a way for you and the district to acclimate to the testing protocol. **Click here to sign up** (<https://ttsu.me/shieldtriad>). We understand the frustration of mandates. We certainly do not intend to add to your or anyone else's frustration as we work to design a system that accommodates all of our employees as best we can.

The following are important points that we considered when designing our testing protocol:

1. Employees opting to test due to the mandate must test on a designated day to ensure the availability of on-site Shield IL testers and accountability on our part as the test provider.
2. On-site testing had to be available immediately before or after employees' workday or work shift.
3. Friday testing allows time for the administration to notify employees of their results while at home instead of at work.
4. Friday testing allows the district time to plan for substitute employees if needed.

We know that adults can complete Shield IL testing rather quickly. We will do our best to make the process run smoothly and quickly whether it is before or after your workday.

Testing officially begins per the new Executive Order the week of September 19th. Please sign up for a testing time on Friday, September 17th using the following link: (<https://ttsu.me/shieldtriad>). We have attached a step-by-step guide on how to use the registration system.

If you choose to complete testing on your own, the results of your test must be turned in to your building administrator or supervisor by the end of your workday on the first day of the workweek.

Thank you for your cooperation. Knowing that you cannot eat or drink one hour before your test, we will have a complimentary drink for you after you complete your test.

Thank you!



--

Kennan Fagan, Assistant Superintendent  
Triad Community Unit School District #2  
203 E. Throp Street, Troy IL 62294  
Office 618-667-5400    Cell 618-910-0576

**IN THE CIRCUIT COURT  
FOR THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS**

STEFANI DONALDSON, TOM OLLER, )  
FAITH ROBINSON, CHRIS STEVENS, )  
STEPHANIE STOYANOFF, MELISSA )  
TEBBE, CHRISTINA BECKER, VICKI )  
BRIDGES, JESSICA GREEN, AMBER )  
STEVENS. )

Plaintiffs, )

VS. )

Case No. 2021-MR-\_\_\_\_\_

EDWARDSVILLE COMMUNITY )  
UNIT DISTRICT #7, a body )  
politic and corporate, PATRICK )  
SHELTON, as Superintendent of )  
EDWARDSVILLE COMMUNITY )  
DISTRICT #7, TRIAD COMMUNITY )  
UNIT #2, a body politic and corporate, )  
LEIGH LEWIS as Superintendent of )  
TRIAD COMMUNITY UNIT #2 )

Defendants. )

**FIRST AMENDED VERIFIED MOTION FOR AND EMGERGENCY  
TEMPORARY RESTRAINING AND PRELIMINARY INJUNCTION**

COMES NOW Plaintiffs, STEFANI DONALDSON, TOM OLLER, FAITH ROBINSON, CHRIS STEVENS, STEPHANIE STOYANOFF, MELISSA TEBBE, (Donaldson through Tebbe are collectively referred to as the "Edwardsville Educators") and CHRISTINA BECKER, VICKI BRIDGES, JESSICA GREEN, AMBER STEVENS, (Becker through Stevens are collectively referred to as the "Triad Educators"), by and through their attorney, Thomas G. DeVore of the Silver Lake Group, Ltd., and moves this Court pursuant to 735 ILCS 5/11-101 and 735 ILCS 5/11-102 for entry of a Temporary Restraining Order and Preliminary Injunction against Defendants, Defendants, TRIAD COMMUNITY UNIT #2 ("Triad District"), a body politic and corporate,

and LEIGH LEWIS ("Lewis"), as Superintendent of TRIAD COMMUNITY UNIT #2, EDWARDSVILLE COMMUNITY UNIT DISTRICT #7 ("Edwardsville District"), a body politic and corporate, PATRICK SHELTON ("Shelton"), as Superintendent of EDWARDSVILLE COMMUNITY DISTRICT #7, and hereby plead:

In support of this Motion states as follows:

1. Plaintiffs have filed a Verified Complaint for Declaratory Judgment and Writ of Injunction which Verified Complaint is incorporated herein by reference.
2. The emergency injunctive relief Plaintiffs now seeks is necessary prohibit substantial and irreparable injury to protect rights of Plaintiffs to not be compelled to submit to vaccinating or mask wearing as medical treatments, or submit to testing should vaccination be refused, to purportedly limit the spread of an infectious disease, until such time as the Court rules on the permanent injunction.
3. The Plaintiffs are being forced by the Defendants to either submit to vaccination or testing, as well as compulsory mask wearing as a medical treatment and form of monitoring, all allegedly to limit the spread of an infectious disease, or each will be excluded from the facilities operated by Defendants and denied the opportunity to perform their public duties of educating their students.
4. The Verified Complaint for Declaratory Relief and Writ of Injunction has set forth Plaintiffs clear ascertainable rights to be protected and has demonstrated there exists a reasonably likelihood of Plaintiffs success on the merits.
5. Plaintiff has no adequate remedy at law in that the Plaintiffs are being forced to submit to vaccination or testing, as well as compulsory mask wearing, all alleged to

limit the spread of an infectious disease, before being allowed entry upon the school premises to perform their duties of educating their students.

6. The public's interest is still protected in that the Certified Local Health Department has the authority to isolate or quarantine any or all of the Plaintiffs for failure to submit to vaccination or mask wearing as medical treatments, or failure to submit to testing, as authorized under Illinois Law.

WHEREFORE, Plaintiffs, STEFANI DONALDSON, TOM OLLER, FAITH ROBINSON, CHRIS STEVENS, STEPHANIE STOYANOFF, MELISSA TEBBE, CHRISTINA BECKER, VICKI BRIDGES, JESSICA GREEN, AMBER STEVENS, pray for entry of the following order:

- A. Issuance of a Temporary Restraining Order, without bond, restraining Defendants, to discontinue forcing vaccination or testing on the Plaintiffs to allegedly limit the spread of an infectious disease unless Plaintiffs consent, or the Certified Local Health Department, or Illinois Department of Health has provided Defendants a lawful court order compelling the same;
- B. Issuance of a Temporary Restraining Order, without bond, restraining Defendants, from excluding the Plaintiff's from the school facilities for not complying with mask wearing to allegedly limit the spread of an infectious disease unless Plaintiffs consent, or the Certified Local Health Department, or Illinois Department of Health has provided Defendants a lawful court compelling the same;
- C. Issuance of a Preliminary Injunction, without bond, restraining Defendants, to discontinue forcing vaccination or testing on the Plaintiffs to allegedly limit the spread of an infectious disease unless Plaintiffs consent, or the Certified Local



Health Department, or Illinois Department of Health has provided Defendants a lawful court order compelling the same;

- D. Issuance of a Preliminary Injunction, without bond, restraining Defendants, from excluding the Plaintiff's from the school facilities for not complying with mask wearing to allegedly limit the spread of an infectious disease unless Plaintiffs consent, or the Certified Local Health Department, or Illinois Department of Health has provided Defendants a lawful court compelling the same;
- E. For such other and further relief as this Court deems just and proper.

By: /s/ Thomas Devore  
Thomas G. DeVore  
IL Bar Reg. No. 06305737  
**silver lake group ltd.**  
Attorneys for Plaintiff  
118 N. 2nd St.  
Greenville, IL 62246  
Telephone - 618-664-9439

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Stefani Donaldson

STEFANI DONALDSON

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Tom Oller

TOM OLLER

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Faith Robinson

FAITH ROBINSON

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Chris Stevens

CHRIS STEVENS

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Stephanie Stoyanoff

STEPHANIE STOYANOFF

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Melissa Tebbe

MELISSA TEBBE

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Christina Becker

CHRISTINA BECKER



### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Vicki Bridges

VICKI BRIDGES

### **VERIFICATION**

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Jessica Green

JESSICA GREEN

### VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: September 22, 2021

By: /s/ Amber Stevens

AMBER STEVENS