

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

SHANE BECK,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
JAMES ROOT and MATTHEW JEDLICKA,)	
)	
Defendants.)	

COMPLAINT

COMES NOW the Plaintiff, Shane Beck [“Beck”], and for his causes of action against the Defendants, James Root [“Root”] and Matthew Jedlicka [“Jedlicka”], states as follows:

JURISDICTION

The jurisdiction of this Court is invoked pursuant to the terms of Title 28, United States Code, Sections 1331 and 1337, together with Title 42, United States Code, Sections 1983 and 1988. This is a civil action arising under the laws of the United States. Specifically, this is an action brought in furtherance of a certain Act of Congress which guarantees to citizens of the United States protections against the acts of public officers which infringe upon their rights under the Constitution of the United States.

The venue of this Court to entertain the issues raised in this case is appropriate by virtue of Title 28, United States Code, Section 1391(b) since the Defendants reside within the judicial district of this Court and the claims giving rise to the above captioned proceeding did occur within the judicial district of this Court.

PARTIES

1. That Beck is an adult resident of Macon County, Illinois. At all times relevant to this proceeding, he was employed by the Macon County Sheriff's Department ["Department"] as a deputy sheriff.

2. That at all times relevant to this proceeding, Root was the elected Sheriff of Macon County, Illinois. In that capacity he was the chief law enforcement officer of the County. He is named in this proceeding in his individual and, for purposes of implementing equitable relief, his official capacities.

3. That Jedlicka, at all times relevant to this proceeding, was employed by the Department as the chief deputy. In his position he supervised deputies employed in the Department and participated in making decisions with respect to matters involving deputies employed by the Department. He is named in this proceeding in his individual and, for purposes of implementing equitable relief, his official capacities.

ALLEGATIONS COMMON TO ALL COUNTS

4. That Beck joined the Department as a deputy sheriff in January of 2016 and has continuously served the Department to the present time. Other than a few minor shift counseling's, he received no discipline prior to May of 2025. At all times, his conduct and service to the Department was such that he satisfied the reasonable behavior and performance expectations that the Department had for a deputy sheriff.

5. That Root, in addition to his position as the Sheriff of Macon County, Illinois, serves as the co-chairman of the Macon County Republican Central Committee. He is a candidate for re-election to the office of Macon County Sheriff in the 2026 Republican primary election.

6. That on information and belief Jedlicka, in addition to his position in the Department, has been active in promoting Root's candidacy for re-election.

7. That as a deputy sheriff in the Department Beck neither serves it in a policy making role nor maintains a confidential relationship with the Sheriff.

8. That in the Spring of 2024 Beck began exploring the feasibility of running as the candidate of the Republican Party for the office of Macon County Sheriff in the 2026 general election.

9. That once he decided to announce his candidacy Beck, as a courtesy to a supervisor, informed Root during a telephone conversation he initiated that he intended to stand as a candidate for Macon County Sheriff in the 2026 Republican primary election.

10. That following the conversation referred to in the preceding paragraph the demeanor of both Root and Jedlicka when around Beck noticeably changed. Each was more remote and less congenial with him.

11. That while serving as a deputy Beck was selected for service as a member of the Department's Special Response Team ["SRT"]. Membership on the SRT carries with it some prestige within the Department. Only a select number of deputies are chosen to serve on the SRT.

12. That in campaigning for election Beck was careful to:

- a) campaign on off duty time;
- b) not campaign on Macon County property;
- c) make clear that he was not speaking for the Department or in his capacity as a Department employee, but rather as a citizen running for public office; and
- d) neither represent nor imply that the Department was endorsing his candidacy.

13. That during the course of his campaign Beck spoke out on matters of public concern which may not have reflected well on Root's record as sheriff. Among other things, Beck indicated that if elected, he would:

- a) be even handed and avoid favoritism in enforcing the law;
- b) be faithful to promotional eligibility lists in selecting the best qualified candidates for promotion; and
- c) devote all of his time to serving the public and not work side jobs.

14. That the views expressed by Beck as described in the preceding sentence were made in his capacity as a citizen, not as a Department employee and neither impeded, disrupted nor interfered with the operations of the Department.

15. That during the course of Beck's campaign Root and Jedlicka began acting out against Beck. In this respect:

- a) in February of 2025 contrary to the conventional practice within the Department, they disregarded the recommendation of the shift command and disapproved the elevation of Beck to the position of an assistant shift commander;
- b) in April of 2025, without proper cause, they removed Beck from his position as a field training officer where he had competently served for over 4 years
- c) in May of 2025 they charged Beck with insubordination because of a conversation Beck had with Jedlicka at an off duty fundraiser event where each was consuming alcohol during which Jedlicka expressed his displeasure with Beck carrying a sign promoting his candidacy for sheriff;
- d) in January of 2026 Root removed Beck from the SRT and refused to give any reason for the removal decision; and

e) in January of 2026 Root initiated an investigation against Beck for off duty comments either made by or attributed to Beck which did not reflect well on Root.

16. That the conduct of Root and Jedlicka as described above was undertaken under color of law.

COUNT I

For his cause of action against Root, Beck states as follows:

1. - 16. That for paragraphs 1 through 16 of Count I Beck repeats paragraphs 1 through 16 from above.

17. That the conduct directed by Root towards Beck was undertaken in retaliation for Beck speaking out on matters of public importance which are more particularly described in paragraph 13 above. In so doing Root interfered with Beck's exercise of rights guaranteed to him under the First and Fourteenth Amendments to the Constitution of the United States.

18. That as a direct and proximate result of the foregoing conduct Beck sustained the loss of certain economic benefits derived in his position of employment with the Department. Additionally, he has suffered emotional pain and anguish, damage to his reputation, embarrassment and humiliation, inconvenience and the loss of enjoyment of life.

COUNT II

For his cause of action against Jedlicka, Beck states as follows:

1. - 16. That for paragraphs 1 through 16 of Count II Beck repeats paragraphs 1 through 16 from above.

17. That the conduct directed by Jedlicka towards Beck was undertaken in retaliation for Beck speaking out on matters of public importance more particularly described in paragraph 13

above. In so doing Jedlicka interfered with Beck's exercise of rights guaranteed him under the First and Fourteenth Amendments to the Constitution of the United States.

18. That as a direct and proximate result of the foregoing conduct Beck sustained the loss of certain economic benefits derived in his position of employment with the Department. Additionally, he has suffered emotional pain and anguish, damage to his reputation, embarrassment and humiliation, inconvenience and the loss of enjoyment of life.

WHEREFORE, Plaintiff, Shane Beck, respectfully requests that this Court enter judgment in his favor and against the Defendants and provide the following relief:

A. Enter a declaratory judgment determining that the actions complained of in this complaint are unlawful in violation of the provisions of 28 U.S.C. § 1983 and 1988 and issue a mandatory injunction against the Defendants or their successors to refrain from engaging in any action with respect to Beck which are prohibited under the terms of the foregoing laws;

B. Award Beck damages sufficient to compensate him for economic losses suffered as a result of the conduct as alleged in this Complaint including, but not limited to: 1) salaries; 2) employment benefits; and 3) compensation for employment related expenses incurred by him;

C. Award Beck such compensatory damages as are reasonable under the circumstances;

D. Direct the Defendants reinstate Beck to both membership on the Special Response Team and his position as a field training officer;

E. Assess against the Defendants the costs and expenses incurred by Beck in maintaining the above captioned proceeding together with the reasonable attorney fees incurred by him in prosecuting the above captioned cause;

F. Assess against the Defendants and in favor of Beck such exemplary damages as may be permitted by law; and

G. Provide such other relief as the Court deems to be equitable and just.

THE PLAINTIFF, SHANE BECK, RESPECTFULLY REQUESTS THAT ALL ISSUES RAISED IN THIS PROCEEDING WHICH MAY BY LAW BE PROPERLY TRIED BEFORE A JURY BE TRIED BY A JURY.

Shane Beck, Plaintiff

By: s/ James P. Baker

James P. Baker

Bar Number: 0097802

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