

*****FILED*****
Case Number 2025LA000946
Date: 7/31/2025 9:24 AM
Patrick McRae
Clerk of Circuit Court
Third Judicial Circuit, Madison County Illinois

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

KEVIN LINK,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2025LA000946
)	
CITY OF GRANITE CITY,)	
)	
Defendant.)	

COMPLAINT

Comes now Plaintiff Kevin Link, by and through his attorney, and states as follows:

1. Plaintiff Kevin Link formerly operated rental property in Granite City, Illinois.
2. That Defendant Granite City is a municipality in Madison County, Illinois.
3. That Granite City, in recent years enacted new landlord regulations, with an eye toward ending small home rental business in Granite City.
4. At this point, feeling no longer welcome to do business by the Defendant, Plaintiff began liquidating his real estate rental holdings in Granite City, ultimately selling all of them.
5. Notwithstanding the foregoing, as part of its municipal crusade against Plaintiff and rental property, Defendant cited, in its own municipal court, Plaintiff on over a dozen counts, concerning over a dozen parcels of property, that Plaintiff claimed was not in compliance with one of more Granite City Ordinances.
6. That all of these properties had been sold, with public records with the recorder of deeds showing that some had been sold as far back as seven or eight years prior to the citation.

7. That initially, Defendant blamed Plaintiff, claiming that he never “deregistered” said property from the rental tolls, but in truth there is no forth or mechanism to do so, much less a legal obligation.
8. That Defendant maintains a policy and practice of failing to check public property ownership records prior to charging persons, like Plaintiff, with violations, and prosecuting same, with no actual evidence of any such violation by that person.
9. This action is brought under 42 USC 1983.
10. That as a proximate cause of the foregoing, Plaintiff has been damaged in an amount to be proven at trial, and in excess of \$50,000.00.

WHEREFORE, Plaintiff Kevin Link humbly requests this Honorable Court enter judgment in his favor, and against the City of Granite City, in an amount in excess of \$50,000.00, plus punitive damages, plus costs and attorney fees under 42 USC 1988.

Dated 7-31-2025

Respectfully Submitted:

s/Thomas G. Maag

Thomas G. Maag #6272640
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095

Phone: 619-216-5291
tmaag@maaglaw.com

2025LA000946

CERTIFICATE OF CASE VALUE

The undersigned hereby certifies that this case has a value reasonably in excess of \$50,000.00.

Date: 7-31-2025

s/Thomas G. Maag



CITY OF GRANITE CITY, ILLINOIS
 JENNA DEYONG, CITY CLERK
 2000 EDISON AVE
 GRANITE CITY, IL 62040
 (618) 452-6200

FILED
 Case Number 2025LA000946
 Date: 7/31/2025 9:24 AM
 Patrick McRae
 Clerk of Circuit Court
 Third Judicial Circuit, Madison County Illinois

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	026237	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2606 GRAND AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.
NO PAYMENTS WILL BE ACCEPTED WITHOUT THE NEW APPLICATION BEING COMPLETED.
\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2026.
 Please detach and return with payment

LINK RENTAL PROPERTY	026237	2606 GRAND AVE
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	TOTAL DUE \$ 25.00



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



CITY OF GRANITE CITY, ILLINOIS
 JENNA DEYONG, CITY CLERK
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 GRANITE CITY, IL 62040
 (618) 452-6200

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023317	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2820 LINCOLN AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

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 \$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025.**
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LINK RENTAL PROPERTY	023317	2820 LINCOLN AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



**CITY OF GRANITE CITY, ILLINOIS
 JENNA DEYONG, CITY CLERK
 2000 EDISON AVE
 GRANITE CITY, IL 62040
 (618) 452-6200**

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023316	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	3225 WILLOW AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

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LINK RENTAL PROPERTY	023316	3225 WILLOW AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE: DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



CITY OF GRANITE CITY, ILLINOIS
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 (618) 452-6200

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	BUSINESS NAME AND MAILING ADDRESS	RESPONSIBLE PERSON NAME AND ADDRESS
LICENSE NUMBER:	023315	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2474 IOWA ST	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
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NO PAYMENTS WILL BE ACCEPTED WITHOUT THE NEW APPLICATION BEING COMPLETED.
\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025
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LINK RENTAL PROPERTY	023315	2474 IOWA ST
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



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 GRANITE CITY, IL 62040
 (618) 452-6200

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023313	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2715 BUXTON AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

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NO PAYMENTS WILL BE ACCEPTED WITHOUT THE NEW APPLICATION BEING COMPLETED.
\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025
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LINK RENTAL PROPERTY	023313	2715 BUXTON AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



CITY OF GRANITE CITY, ILLINOIS
 JENNA DEYONG, CITY CLERK
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 GRANITE CITY, IL 62040
 (618) 452-6200

LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
PAYMENT DUE DECEMBER 31, 2024

	BUSINESS NAME AND MAILING ADDRESS	RESPONSIBLE PERSON NAME AND ADDRESS
LICENSE NUMBER:	023310	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2305 ELM AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
-------	----------

SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.
NO PAYMENTS WILL BE ACCEPTED WITHOUT THE NEW APPLICATION BEING COMPLETED.
\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025.
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LINK RENTAL PROPERTY	023310	2305 ELM AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



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LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022

**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023309	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2812 FOREST AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES

CALCULATION OF LICENSE FEE UNITS LICENSE FEE

TOTAL		\$ 25.00
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SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.

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\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025

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LINK RENTAL PROPERTY	023309	2812 FOREST AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
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LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
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**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023308	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2707 E 24TH ST	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.

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LINK RENTAL PROPERTY	023308	2707 E 24TH ST
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



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**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023307	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2506 IOWA ST	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

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LINK RENTAL PROPERTY	023307	2506 IOWA ST
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



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 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



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 PO BOX 22
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**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	BUSINESS NAME AND MAILING ADDRESS	RESPONSIBLE PERSON NAME AND ADDRESS
LICENSE NUMBER:	023306	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2716 MADISON AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
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LINK RENTAL PROPERTY	023306	2716 MADISON AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



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**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023305	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2111 ALEXANDER AVE	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS

LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.

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Please detach and return with payment

LINK RENTAL PROPERTY	023305	2111 ALEXANDER AVE
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



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 KEVIN LINK
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**BUSINESS LICENSE RENEWAL FOR THE CALENDAR YEAR 2025
 PAYMENT DUE DECEMBER 31, 2024**

	<u>BUSINESS NAME AND MAILING ADDRESS</u>	<u>RESPONSIBLE PERSON NAME AND ADDRESS</u>
LICENSE NUMBER:	023303	
NAME:	LINK RENTAL PROPERTY	KEVIN LINK
ADDRESS:	PO BOX 22	PO BOX 22
ADDRESS 2:		
CITY, ST, ZIP:	GRANITE CITY IL 62040-0022	GRANITE CITY IL 620400022
PHONE:	618-931-0244	
EMAIL:		
LOCATION:	2542 E 24TH ST	TAX ID NUMBER:

BUSINESS DESC: RENTAL PROPERTIES
 CALCULATION OF LICENSE FEE UNITS LICENSE FEE

TOTAL	\$ 25.00
--------------	-----------------

SEE ATTACHED LETTER FOR DETAILS ON RENTAL PROPERTY ORDINANCE.
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\$50.00 LATE FEE WILL BE APPLIED TO ALL UNPAID LICENSES AS OF JANUARY 31, 2025
 Please detach and return with payment

LINK RENTAL PROPERTY	023303	2542 E 24TH ST
	TOTAL DUE	\$ 25.00
DUE DATE	PAYMENT DUE DECEMBER 31, 2024	



LINK RENTAL PROPERTY
 KEVIN LINK
 PO BOX 22
 GRANITE CITY IL 62040-0022



CLERK'S CERTIFICATE

The foregoing 14 page(s)
 is a true and correct copy of
 the original a copy on file
 with this office.

Clerk of the Circuit Court

9-16-25 by [Signature]
 Date Deputy