

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, OTTAWA, ILLINOIS

*Gina Vaccaro*  
CLERK OF THE CIRCUIT COURT  
LASALLE COUNTY, ILLINOIS

JERRY LONG,

Plaintiff,

vs.

LANCE YEDNOCK and  
FRIENDS OF LANCE YEDNOCK,

Defendants.

2018 L 2018L 000158

**COMPLAINT AT LAW**

**COUNT I: Long v. Lance Yednock  
(Defamation)**

**NOW COMES** the Plaintiff, JERRY LONG, by and through his attorney Julie Ajster  
and for his Complaint against the Defendant, LANCE YEDNOCK, alleges as follows:

1. At all times relevant and material, Plaintiff, Jerry Long, was and is a resident of the City of Streator, County of LaSalle, State of Illinois.
2. At all times relevant and material, Plaintiff, Jerry Long, was the elected Illinois State Representative for the 76<sup>th</sup> District of Illinois.
3. At all times relevant and material, Defendant, Lance Yednock, was and is a resident of the City of Ottawa, County of LaSalle, State of Illinois.
4. At all times relevant and material, the Defendant, Lance Yednock, was a candidate for Illinois State Representative for the 76<sup>th</sup> District of Illinois.
5. At all times relevant and material, the candidate committee "Friends of Lance Yednock" was the candidate committee for Defendant Lance Yednock's campaign as a candidate for Illinois State Representative for the 76<sup>th</sup> District of Illinois.
6. At all times relevant and material, the Defendant, Lance Yednock, was an officer of the aforementioned candidate committee and had supervisory authority with regard to all ads placed by and paid for by the candidate committee, Friends of Lance Yednock.

7. On or about October 13, 2018, the Defendant contracted with a television station to have said station display on their station and have broadcast to thousands of viewers a political ad.
8. On October 13, 2018 or prior thereto, the Defendant provided the aforementioned television station with an ad that the television station was to display on their station and have broadcast to thousands of viewers.
9. On October 13, 2018, the aforementioned ad was displayed on the aforementioned station and was broadcast to thousands of viewers.
10. The aforementioned political ad addressed the Plaintiff, Jerry Long, and stated in print, "Republicans asked Long to resign over sexual harassment allegations against him."
11. The aforementioned written statement cited an Ottawa, Illinois newspaper, The Times, as a source of that statement with a date of September 14, 2018.
12. The Times newspaper ran an article on September 14, 2018 regarding the Plaintiff, Jerry Long, but said article makes no mention of "sexual harassment."
13. The aforementioned television political ad was paid for by the Friends of Lance Yednock candidate committee.
14. At all times relevant and material, the Plaintiff, Jerry Long, had a reputation within the community of being a good citizen, a charitable person and had a good reputation such that the voters of the 76<sup>th</sup> District elected him as their Illinois State Representative.
15. Any statement that the Plaintiff, Jerry Long, was asked to resign over allegations of sexual harassment is false and the Defendant, Lance Yednock, knew said statement was false prior to and at the time he made said statement in the aforementioned political ad.
16. The statement made by Defendant was false and he knew said statement was false at the time he made said statement.
17. The false statement made by the Defendant were made with malice.
18. As a direct and proximate result of the aforementioned false statements by Defendant, Lance Yednock, Plaintiff, Jerry Long, has suffered harm to his personal and professional reputation, humiliation, extreme emotional distress and mental suffering.

**WHEREFORE**, it is respectfully requested that this Court enter judgment in favor of the Plaintiff JERRY LONG, and against Defendant, LANCE YEDNOCK, and award Plaintiff

compensatory, actual and punitive damages in an amount in excess of fifty thousand dollars (\$50,000.00) and for costs of this action.

**COUNT II: Long v. Friends of Lance Yednock  
(Defamation)**

**NOW COMES** the Plaintiff, JERRY LONG, by and through his attorney Julie Ajster and for his Complaint against the Defendant, FRIENDS OF LANCE YEDNOCK, alleges as follows:

1. At all times relevant and material, Plaintiff, Jerry Long, was and is a resident of the City of Streator, County of LaSalle, State of Illinois.
2. At all times relevant and material, Plaintiff, Jerry Long, was the elected Illinois State Representative for the 76<sup>th</sup> District of Illinois.
3. At all times relevant and material, Lance Yednock was and is a resident of the City of Ottawa, County of LaSalle, State of Illinois.
4. At all times relevant and material, Lance Yednock was a candidate for Illinois State Representative for the 76<sup>th</sup> District of Illinois.
5. At all times relevant and material, the Defendant, Friends of Lance Yednock, was a candidate committee for Lance Yednock and his candidacy for Illinois State Representative for the 76<sup>th</sup> District of Illinois.
6. At all times relevant and material, Lance Yednock was an officer of the aforementioned candidate committee and had supervisory authority with regard to all ads placed by and paid for by the candidate committee, Friends of Lance Yednock.
7. On or about October 13, 2018, the Defendant contracted with a television station to have said station display on their station and have broadcast to thousands of viewers a political ad.
8. On October 13, 2018 or prior thereto, the Defendant provided the aforementioned television station with an ad that the television station was to display on their station and have broadcast to thousands of viewers.
9. On October 13, 2018, the aforementioned ad was displayed on the aforementioned station and was broadcast to thousands of viewers.
10. The aforementioned political ad addressed the Plaintiff, Jerry Long, and stated in print, "Republicans asked Long to resign over sexual harassment allegations against him."

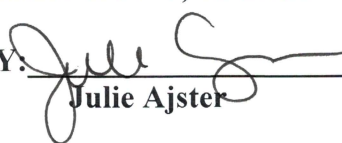


11. The aforementioned written statement cited an Ottawa, Illinois newspaper, The Times, as a source of that statement with a date of September 14, 2018.
12. The Times newspaper ran an article on September 14, 2018 regarding the Plaintiff, Jerry Long, but said article makes no mention of “sexual harassment.”
13. The aforementioned television political ad was paid for by Defendant Friends of Lance Yednock.
14. At all times relevant and material, the Plaintiff, Jerry Long, had a reputation within the community of being a good citizen, a charitable person and had a good reputation such that the voters of the 76<sup>th</sup> District elected him as their Illinois State Representative.
15. Any statement that the Plaintiff, Jerry Long, was asked to resign over allegations of sexual harassment is false and the Defendant knew said statement was false prior to and at the time he made said statement in the aforementioned political ad.
16. The statement made by the Defendant was false and it knew said statement was false at the time it made said statement.
17. The false statement made by the Defendant were made with malice.
18. As a direct and proximate result of the aforementioned false statements by Defendant, Friends of Lance Yednock, Plaintiff, Jerry Long, has suffered harm to his personal and professional reputation, humiliation, extreme emotional distress and mental suffering.

**WHEREFORE**, it is respectfully requested that this Court enter judgment in favor of the Plaintiff JERRY LONG, and against Defendant, FRIENDS OF LANCE YEDNOCK, and award Plaintiff compensatory, actual and punitive damages in an amount in excess of fifty thousand dollars (\$50,000.00) and for costs of this action.

**RESPECTFULLY SUBMITTED,**


**JERRY LONG, Plaintiff**

BY:   
Julie Ajster

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**AFFIDAVIT**


Under penalties as provided by law pursuant to Illinois Supreme Court Rule 222, the undersigned certifies that at the time of this filing the amount of damages claimed exceeds \$50,000.00 to the best of her knowledge and belief.

  
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Julie L. Ajster, Attorney

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**VERIFICATION**

I, Julie L. Ajster, being first duly sworn on oath, do hereby affirm that I have the foregoing Complaint and the allegations contained therein are true, correct and complete to the best of my knowledge, information and belief.



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Julie L. Ajster, Attorney for Plaintiff