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Mariyana T. Spyropoulos
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

MARY CATHERINE SCHEFFKE,
individually and as Founder of Chicago
French Bulldog Rescue, Inc., NFP,

Plaintiff,

v.

SUSAN SCHULZ and VICTORIA McELIGOTT,
individually and as Directors of Chicago
French Bulldog Rescue, Inc., NFP,

Defendants,

and

CHICAGO FRENCH BULLDOG RESCUE, INC., NFP,

Nominal Defendant.

Case No. 2026CH04709

VERIFIED COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

NATURE OF THE ACTION

1. Four French Bulldogs live at the Chicago French Bulldog Rescue shelter in Channahon, Illinois. None of them belong to Mary Scheffke. All of them were surrendered to the rescue because no one else would take them. One requires a wheelchair to move; another is severely deformed and being fitted for a custom 3D-printed cast; a third was found dumped outside with serious medical conditions requiring constant monitoring. Three of the four were abandoned outdoors. All require daily physical therapy, regular trips to veterinary specialists, and the kind of sustained, knowledgeable care that most foster homes are not equipped to provide. French Bulldogs are a breed notorious for catastrophic health problems, including intervertebral disc

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disease, respiratory distress, and spinal conditions that leave them paralyzed. The dogs that come to this rescue are not the ones that find homes easily. They are the ones that would otherwise be put down. Mary Scheffke is the reason they are alive.

2. Ms. Scheffke founded Chicago French Bulldog Rescue eighteen years ago. She has been its President, its Executive Director, and its only full-time worker since the day it was incorporated. Her employment agreement sets her salary at \$30,000 per year- a figure she has not consistently received since 2020. She lives at the shelter because her job requires it. She is on call around the clock. When a dog arrives at two in the morning with a shattered jaw, she is the one who drives it to the emergency veterinarian. When fifteen abandoned French Bulldogs were found at O'Hare, she answered the phone. When a wheelchair-bound Frenchie needs range-of-motion exercises three times a day, she does it. There is no one else.

3. Two Board members, Susan Schulz and Victoria McElligott, have decided to remove her. They have already stripped her title as President. They have cut off her access to the organization's funds. They have scheduled a vote on May 27, 2026, to remove her as a Director entirely. If that vote proceeds, she will lose her position, her employment, and her home. And the four dogs in her care will lose the only person who knows how to keep them alive.

4. Schulz and McElligott have spent approximately \$10,000 of the rescue's charitable funds to hire a law firm to carry out this campaign, \$5,000 in an initial payment in late April 2026, and an additional \$5,000 in a second payment made while the campaign was already escalating.

5. The money came from donations given by the public to rescue dogs. The law firm they hired, Wagenmaker & Oberly, LLC, has a disqualifying conflict of interest: it represented this same organization in 2018 and personally designed and blessed every aspect of the employment, compensation, and housing arrangement it is now being paid to investigate as improper.

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6. The governing documents under which Schulz and McElligott claim authority to act do not legally exist. They are unsigned. They are undated. They contain a blank adoption line. No director currently on the Board, other than Schulz and McElligott themselves, has any recollection of ever seeing these documents, voting on them, or being asked to approve them. Neither Schulz nor McElligott were on the Board when these bylaws were purportedly adopted. The operative bylaws of this organization are the 2008 Bylaws drafted by Katten Muchin Rosenman LLP, adopted by unanimous vote, and upon information and belief submitted to the Internal Revenue Service with the organization's application for tax-exempt status. Those bylaws limit director removal to conviction of a felony, animal abuse, or incarceration exceeding ninety days. None of those grounds have been alleged against Ms. Scheffke. None apply.

7. This is what has happened: two Board members and their appointed President, acting under fabricated authority, have taken donated money earmarked for the rescue and care of French Bulldogs and spent \$10,000 of it on lawyers to remove the woman who rescues and cares for French Bulldogs. They did not stop at \$5,000. When that initial expenditure failed to produce the result they wanted, they authorized a second payment of equal size - doubling the diversion of charitable funds while the organization's sole employee was paying for dog food out of her own pocket because they had cut off her debit card. They knew, or should have known, that the documents they rely upon were never validly adopted. The directors proceeded anyway, because this campaign is not about governance. It is about personal grievance.

8. Ms. Scheffke brings this action to restrain the Defendants from proceeding with the May 27 removal vote, to obtain a declaration that the governing documents under which they claim to act are void, and to protect the charitable assets of the organization she founded, and the dogs that depend on her, from further harm.

PARTIES

9. Plaintiff Mary Catherine Scheffke is a resident of Will County, Illinois. She is the founder, President, Executive Director, and a Director of Chicago French Bulldog Rescue, Inc., NFP. She has served in these roles continuously since she incorporated the organization on January 17, 2008.

10. Defendant Susan Schulz is a Director of CFBR and, upon information and belief, a resident of the State of Illinois. She is one of the two Board members who authorized the expenditure of charitable funds to retain Wagenmaker & Oberly, LLC, and who has taken adverse action against Ms. Scheffke.

11. Defendant Victoria McElligott is a Director of CFBR and, upon information and belief, a resident of the State of Illinois. She is the second Board member who authorized the expenditure and who has taken adverse action against Ms. Scheffke.

12. Defendant Michelle Martin is a Director of CFBR and, upon information and belief, a resident of the State of Illinois. On or about May 7, 2026, she was purportedly appointed President of CFBR by the same Board Resolution that removed Ms. Scheffke as President. That appointment was made pursuant to the void 2009 document on which all Defendants' claimed authority rests. Ms. Martin has accepted and is acting in the role of purported President. She is a necessary party to this action both individually and in her capacity as purported President, as any injunctive relief affecting the presidency of CFBR directly affects her claimed position.

13. Nominal Defendant Chicago French Bulldog Rescue, Inc., NFP is an Illinois not-for-profit corporation, File No. 6594-341-7, with its registered office historically in Evanston, Cook County, Illinois, and its shelter property at 25540 S. Blackberry Lane, Channahon, Will

County, Illinois. It is registered with the Illinois Attorney General's Charitable Trust Bureau under CO# 01057336. Its federal employer identification number is 26-1885995.

JURISDICTION AND VENUE

14. This Court has jurisdiction pursuant to the Illinois General Not For Profit Corporation Act, 805 ILCS 105/1 et seq., and pursuant to the Court's general equity jurisdiction over disputes involving breach of fiduciary duty and the governance of charitable organizations. Illinois courts exercise equity jurisdiction to review whether a private not-for-profit corporation has complied with its own bylaws when revoking existing rights or privileges. *Jain v. Northwest Community Hospital*, 67 Ill. App. 3d 420, 425 (1st Dist. 1978); *Carson v. Northwest Community Hospital*, 192 Ill. App. 3d 118, 121 (1st Dist. 1989).

15. Venue is proper in Cook County pursuant to 735 ILCS 5/2-101. Defendant Susan Schulz resides in Cook County, Illinois. Her individual conduct, including authorizing the expenditure of charitable funds, sending harassing communications to Ms. Scheffke, and voting to remove her without valid authority, forms a central basis for the claims asserted herein. Venue is independently proper because CFBR's rescue operations, fundraising, and donor relationships have also been conducted continuously and substantially within Cook County throughout the organization's existence.

FACTUAL BACKGROUND

A. The Organization and Its Mission

16. In January 2008, Mary Scheffke incorporated Chicago French Bulldog Rescue, Inc., NFP, as an Illinois not-for-profit corporation. She was the driving force behind its creation. She filed the Articles of Incorporation, served as the registered agent, and recruited the original

Board of Directors.

17. The organization rescues French Bulldogs from abusive, neglectful, or dangerous situations and places them in permanent adoptive homes. It operates in the greater Chicago area and serves parts of northwest Indiana and southern Wisconsin.

18. French Bulldogs are among the most medically vulnerable breeds in existence. They are prone to intervertebral disc disease, brachycephalic airway syndrome, hip dysplasia, allergies, and spinal conditions that can leave them partially or fully paralyzed. Many of the dogs that come into this rescue arrive with acute medical crises or chronic conditions that require intensive, ongoing care. Some arrive in such condition that other rescues and shelters have already declined to take them. Many would be euthanized if CFBR did not exist.

19. As of the date of this Complaint, four rescue dogs are living at the CFBR shelter under Ms. Scheffke's direct care, with a fifth French Bulldog in crisis currently awaiting intake- a dog that CFBR has been asked to take in and that Ms. Scheffke is the only person positioned to accept and care for. These are not Ms. Scheffke's personal pets. They are medically vulnerable animals that have been surrendered to the rescue and are being fostered by Ms. Scheffke because they cannot be placed elsewhere. One has spinal disease so severe that he requires a wheelchair to move. A second is severely physically deformed and is currently being fitted for a custom 3D-printed cast as part of her ongoing treatment. A third was found abandoned outside, suffering from serious medical conditions that require constant close monitoring. Three of the four were found dumped outside- discarded dogs that no other rescue would take. All four have conditions that make placement in any other foster home essentially impossible.

20. Ms. Scheffke provides this care herself. She administers medications. She performs physical therapy exercises. She transports the dogs to specialist appointments. She monitors their conditions through the night. This is not custodial pet ownership. It is skilled medical foster care for animals that no one else will take.

21. From 2008 to the present, Ms. Scheffke has been the organization's only full-time worker. She manages every aspect of the rescue's operations: coordinating with animal control agencies and law enforcement throughout the country, arranging veterinary care through a long established network of veterinarians and veterinary techs, evaluating foster homes, conducting adoption screenings, handling intake calls at all hours, training dogs, and personally caring for the dogs at the shelter that are so medically vulnerable, no one else will take care of them. She has over twenty years of experience working with dogs in rescue, training, and rehabilitation. She is not replaceable.

22. For all of this, her employment agreement specifies a salary of \$30,000 per year- a figure that has not been consistently paid since 2020. Defendants' counsel has claimed that Ms. Scheffke's total compensation "exceeds \$50,000 per year." That assertion is false. Her actual cash compensation since 2020 has been less than the already-below-market contractual rate. She also pays rent.

B. The 2018 Employment and Housing Arrangements

23. In 2018, CFBR's Board of Directors determined that the organization needed a formal shelter facility where rescue dogs could be housed and where the Executive Director would be required to live on-site to provide round-the-clock care. The nature of the dogs in CFBR's care, many of them medically fragile and requiring overnight monitoring, made on-site residence essential rather than merely convenient.

24. The Board retained attorney Sally Wagenmaker of Wagenmaker & Oberly, LLC, to advise on the legal and tax aspects of this arrangement. In December 2018, Ms. Wagenmaker reviewed the organization's solicitation materials, advised on structuring the Executive Director position, recommended a letter agreement reflecting the salary, duties, and on-site residency requirement, and confirmed that the housing qualified for exclusion from gross income under

Internal Revenue Code Section 119 as lodging furnished for the convenience of the employer.

25. On December 21, 2018, CFBR issued an Employment Letter Agreement confirming Ms. Scheffke's role as Executive Director at a salary of \$30,000 per year. The letter required her to live on-site at the shelter property as a condition of employment. The Board also adopted a Corporate Resolution formally designating the Executive Director position and addressing the Section 119 housing exclusion.

26. Every component of this arrangement was designed, reviewed, and approved by Wagenmaker & Oberly. Ms. Scheffke has lived at the shelter property and served as Executive Director under these terms since 2019.

C. The Fabricated Governing Documents

27. CFBR's operative bylaws are the 2008 Bylaws, drafted by Katten Muchin Rosenman LLP and adopted by unanimous vote of the Board of Directors in June 2008. Upon information and belief, CFBR's Form 1023 application for recognition of exemption under Section 501(c)(3) was submitted to the Internal Revenue Service in 2009. Ms. Scheffke and the organization's co-founder assert, and the record supports, that the 2008 Bylaws were the operative, board-adopted governing documents submitted with that application.

To the extent Defendants contend that the unadopted 2009 document was transmitted to the IRS in connection with that submission, such transmission by outside counsel cannot cure the document's fundamental adoption defect. A draft that was never ratified by the Board does not become operative bylaws by virtue of its transmission to a government agency, especially where the two directors who were actually sitting at the time of that transmission have no knowledge of or recollection of authorizing it.

28. The 2008 Bylaws provide that the Board shall consist of three Directors. A quorum is two. Board positions are voluntary and uncompensated. The grounds for removal of a Board

Member are limited to conviction of a felony, conviction of animal abuse, or incarceration for more than ninety days. Article 3, Section 5. Those grounds are exhaustive.

29. Defendants Schulz and McElligott are operating under a different set of documents. These documents bear an October 2, 2009 date. They purport to be the organization's governing bylaws. They are not.

30. These documents are unsigned. They contain only a typed adoption date at the end of the document -“Adopted: October 2, 2009” - with no signature lines, no officer certification, no minutes of their being approved, much less discussed, and no evidence of any formal adoption proceeding. The document bears an internal KMR file number (60752423) at its header, consistent with its status as a law firm draft that was never executed. There is no record in the organization's files that they were ever presented to the full Board for consideration. There is no record that a vote was taken. Neither defendant was on the Board of Directors at the time the purported documents would have been ratified. There is no record that the amendment procedures required by the 2008 Bylaws or by the Illinois General Not For Profit Corporation Act, 805 ILCS 105/1 et seq., were followed. There are no minutes of a Board meeting discussing these purported documents.

31. Ms. Scheffke, who has served as President and Director since the organization's founding, has no recollection of ever seeing these documents, voting on them, or being asked to approve them. The organization's co-founder, who was on the Board of Directors at the time, Kathleen Miranda, likewise has no recollection of any such vote or adoption-or ever having seen the purported documents.

32. Under the 2008 Bylaws, a quorum of two Directors was required to take any Board action. Section 5.2 of the 2009 document itself lists three directors “as of the date of this Amendment and Restatement”: Mary Scheffke, Lynne Miller, and Kathleen Miranda. A quorum of two was required. Two of those three directors, Ms. Scheffke and Ms. Miranda, have no

recollection of this document, voting on it, or being asked to approve it. If no quorum was present or consented, no valid adoption occurred. The 2009 documents are void. They have no legal force. Any action taken under them is without authority.

33. Defendants knew, or in the exercise of reasonable diligence should have known, that these documents were never validly adopted. They chose to select them and rely on them anyway.

D. The Misappropriation of Charitable Funds

34. In or around late April 2026, Defendants Schulz and McElligott began a campaign to remove Ms. Scheffke from the organization she founded. They did not open with a board resolution or a formal grievance. They opened with a series of harassing, personally abusive, profanity-laced text messages sent to Ms. Scheffke through CFBR's own communications channels. The governance process came later. The personal vendetta came first.

35. Within days of sending those messages, and without pausing to verify whether they had any valid authority to act, Schulz and McElligott authorized an initial payment of approximately \$5,000 from CFBR's charitable funds to retain Wagenmaker & Oberly, LLC. They subsequently authorized a second payment of approximately \$5,000, bringing the total diversion of charitable funds to approximately \$10,000. The second payment was made after the campaign was already well underway-after Ms. Scheffke had been stripped of her presidency, after her debit card had been cut off, and after a removal vote had been scheduled.

36. The Rescue's donated money was not theirs to spend. The authority was not theirs to exercise. The donors who gave it likely had no idea it would be used for this purpose and not rescuing and caring for French Bulldogs. The \$10,000 did not come from a legal expense budget. It came from the same pool of money that buys medications, funds emergency surgeries, and keeps wheelchair-dependent dogs alive. This is an organization whose sole employee has not consistently been paid

her contractual salary of \$30,000 since 2020, an organization that operates on donations and goodwill and nothing else. In that context, \$10,000 is not a rounding error. It represents a third of the Executive Director's annual salary, spent not on the organization's mission, but on lawyers to remove the person who carries out that mission. Schulz and McElligott spent it on lawyers to remove the person arranging the surgeries

37. The misuse donor funds continued when on May 14, 2026 the Board of Directors and their new President, Michelle Martin, took another \$5,000 from the rescue to again pay for legal fees to pursue their personal vendetta.

38. The first payment was made ten days before the firm sent any formal demand or communication to Ms. Scheffke's counsel. There was no pending litigation, no regulatory inquiry, and no exigent circumstance requiring legal counsel. There was no attempt at reconciliation or mediation. The purpose of the retention was not to advance CFBR's charitable mission. It was to remove the founder.

39. These payments also violated CFBR's own Conflict of Interest Policy, which requires directors with a personal interest in a transaction to disclose that interest and recuse from the vote. Schulz and McElligott had authored the harassing texts. They had decided on removal before any process began. They had a profound and documented personal interest in this expenditure. They disclosed nothing. They recused from nothing. They voted, collected the result they wanted, and called it a board decision.

E. Wagenmaker & Oberly's Conflict of Interest

40. The law firm being paid with charitable funds to pursue this campaign previously represented CFBR on the identical subject matter.

41. The firm built this arrangement brick by brick, put its professional signature on every component, and took a fee for doing so. It is now being paid, from the same charitable fund

it once helped structure, to tear it down. That is not a conflict of interest in the abstract. That is a law firm selling the same client opposite legal conclusions on the same facts, in the same matter, eight years apart, for two separate fees.

42. The May 1, 2026 demand letter from Wagenmaker & Oberly identifies as subjects of investigation the precise compensation, housing, and benefit arrangements that Ms. Wagenmaker personally designed in 2018. The governing rule is Illinois Rule of Professional Conduct 1.7(a)(2), not merely Rule 1.9. The firm cannot independently investigate whether its own prior work was proper. If it concludes the 2018 arrangement was lawful, it vindicates itself. If it concludes the arrangement was unlawful, it exposes itself to malpractice.

43. Schulz and McElligott knew, or had every reason to know, that Wagenmaker & Oberly had represented CFBR on this precise subject matter in 2018. The 2018 engagement was not obscure. The firm's name was on the documents. They hired it anyway -with charitable funds, without disclosure, without recusal, and without a moment's consideration for what that choice would cost the organization or the animals it exists to serve. That is not a governance misstep. That is a willful breach of fiduciary duty.

E. The Rapidly Escalating Campaign

44. On May 1, 2026, attorney Clyde Taylor of Wagenmaker & Oberly sent a demand letter to Ms. Scheffke's counsel stating that the firm was investigating Ms. Scheffke's compensation, housing, benefits, and use of the shelter property.

45. On May 7, 2026, the Board purported to adopt a resolution removing Ms. Scheffke as President and installing Director Michelle Martin as President.

46. On May 11, 2026, the Board restricted Ms. Scheffke's access to the organization's debit card, cutting off her ability to purchase food, medications, and supplies for the four rescue dogs in her care. There was no request for a meeting, conversation or opportunity for remediation

given.

47. Also on May 11, 2026, counsel for the Board informed Ms. Scheffke's counsel that a vote to remove her as a Director has been scheduled for May 27, 2026.

48. Ms. Scheffke continues to live at the shelter property. She continues to care for the four surrendered dogs housed there, including performing daily physical therapy, administering medications, and providing the specialized care these animals require. She has not abandoned her duties. She has not abandoned the dogs. She is paying for their care out of her own pocket because the Board has cut off her access to organizational funds.

COUNT I

Declaratory Judgment: Void Governing Documents

(Against All Defendants)

49. Plaintiff incorporates paragraphs 1 through 45 as though fully set forth herein.

50. An actual controversy exists regarding the validity of the governing documents under which Defendants claim authority to act.

51. The 2008 Bylaws are the operative governing documents of CFBR. They were drafted by Katten Muchin Rosenman LLP and adopted by unanimous vote. Upon information and belief, they were submitted to the IRS as part of the Form 1023 application process in 2009 and accepted in November 2009.

52. The documents bearing an October 2, 2009 date are void. They are unsigned, uncertified, and were never adopted by formal vote as required by the 2008 Bylaws and 805 ILCS 105/1 et seq. Defendants were not on the Board in 2009. They were not there. The directors who

were there, whose names appear in the document itself, have sworn that it was never presented to them, never discussed, and never voted upon. Defendants are staking their authority to remove the organization's founder on documents that the people who were in the room say never happened.

53. Plaintiff is entitled to a declaration that the 2008 Bylaws are the sole operative governing documents of CFBR, that the 2009 documents have no legal force, and that any actions taken in reliance on them, including the May 7, 2026 resolution removing Ms. Scheffke as President, are void *ab initio*.

54. Operation of CFBR under void governing documents that were never duly adopted jeopardizes the organization's 501(c)(3) tax-exempt status, a matter of direct concern to every donor who has contributed to this organization and to the public interest in the proper administration of charitable assets.

COUNT II

Breach of Fiduciary Duty

(Against Defendants Schulz and McElligott)

55. Plaintiff incorporates paragraphs 1 through 52 as though fully set forth herein.

56. As Directors of an Illinois not-for-profit corporation, Defendants owe fiduciary duties of care, loyalty, and good faith to CFBR and to the charitable mission it serves.

57. Defendants breached these duties by authorizing the expenditure of approximately \$10,000 in charitable funds to retain a law firm for the purpose of pursuing a personal campaign against the organization's founder rather than advancing its charitable mission.

58. Defendants further breached these duties by acting under governing documents they knew or should have known were void, by failing to disclose their personal animus toward Ms. Scheffke and recuse themselves as required by CFBR's Conflict of Interest Policy, by removing the organization's President without any hearing or authority, by restricting Ms.

Scheffke's access to funds needed for the care of rescue animals, and by scheduling a vote to remove the founder as Director on grounds not authorized by the operative bylaws.

59. As a direct and proximate result, CFBR has suffered the loss of at least \$5,000 in charitable funds, disruption of its operations, impairment of its ability to care for the medically fragile animals in its custody, and damage to its reputation with donors, volunteers, and the public.

COUNT III

Injunctive Relief

(Against All Defendants)

60. Plaintiff incorporates paragraphs 1 through 57 as though fully set forth herein.

61. The May 27, 2026 vote to remove Ms. Scheffke as Director, if permitted to proceed, will cause irreparable harm that cannot be remedied by money damages.

62. Ms. Scheffke lives at the shelter property as a condition of her employment under an arrangement designed by Wagenmaker & Oberly in 2018. Removal as Director will lead to termination of her employment, which will result in the loss of her home. Loss of housing constitutes irreparable harm.

63. Four surrendered rescue dogs are currently in Ms. Scheffke's care at the shelter, with a fifth French Bulldog in crisis awaiting intake that only Ms. Scheffke is positioned to accept. These dogs have acute and chronic medical conditions including IVDD, spinal paralysis, and brachycephalic airway syndrome. They require daily physical therapy, wheelchair assistance, specialist veterinary appointments, rehabilitation, and overnight monitoring. Ms. Scheffke is the only person currently providing this care. Removing her from the shelter without a qualified transition plan creates an immediate and concrete risk to the welfare of these animals. There is no identified replacement caregiver. There is no transition plan. These dogs cannot advocate for themselves. Someone must.

64. Ms. Scheffke founded this organization eighteen years ago. She has dedicated her professional life to its mission. It is her life's work and a dream she envisioned and made happen. The destruction of that relationship cannot be reduced to a dollar figure. It is the kind of harm that equity exists to prevent.

65. Ms. Scheffke has a strong likelihood of success on the merits. The governing documents under which Defendants claim authority are void. The operative bylaws do not authorize removal on the grounds asserted. The expenditure of charitable funds was a breach of fiduciary duty. The law firm retained has a disqualifying conflict of interest.

66. The balance of hardships favors injunctive relief. The only hardship to Defendants from a temporary restraining order is a pause. The hardship to Ms. Scheffke is the loss of her home, her livelihood, the organization she built, and the welfare of four medically fragile animals in her care - one wheelchair-dependent, one undergoing treatment for severe deformity, one dumped outside with serious ongoing medical needs -plus a fifth in crisis awaiting intake that will have nowhere to go if she is removed.

67. Injunctive relief serves the public interest. CFBR is a registered charitable organization. Its donors, volunteers, and the public have an interest in ensuring that charitable funds are used for their intended purpose, that governance is conducted lawfully, and that the medically fragile animals in the organization's care are not placed at risk by a power struggle between Board members.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mary Catherine Scheffke respectfully requests that this Court:

A. Enter a temporary restraining order and preliminary injunction restraining Defendants from conducting the May 27, 2026 vote to remove Ms. Scheffke as Director, and from taking any further adverse action against her, pending resolution of this action;

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B. Enter a declaration that the 2008 Bylaws are the sole operative governing documents of CFBR;

C. Enter a declaration that the 2009 documents are void and that all actions taken under them are without legal effect;

D. Enter a declaration that the May 7, 2026 resolution removing Ms. Scheffke as President is void;

E. Enter an order restoring Ms. Scheffke's access to organizational funds necessary for the care of the rescue animals in her custody;

F. Enter an order requiring Defendants to account for all charitable funds expended in connection with their campaign against Ms. Scheffke;

G. Award Plaintiff her reasonable attorneys' fees and costs; and

H. Grant such other and further relief as this Court deems just and equitable.

Respectfully submitted,

Respectfully Submitted,
/s/ R Tamara de Silva
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Counsel for Plaintiff

May 15, 2026

/s/ Jonathan Lubin
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VERIFICATION

Under penalties 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 and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true. I have read the foregoing Verified Complaint for Injunctive and Declaratory Relief, that I know the contents thereof, and that the factual statements contained therein are true and correct to the best of my knowledge, information, and belief.

Signed by:



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Mary Catherine Scheffke

Dated: 5/15/2026

State of Illinois
County of Will

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Certificate Of Completion

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| Source Envelope: | |
| Document Pages: 18 | Signatures: 1 |
| Certificate Pages: 1 | Initials: 0 |
| AutoNav: Enabled | Envelope Originator: R TAMARA DESILVA rtamaradesilva@gmail.com |
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Signer Events

Mary Scheffke
tushay2mm@msn.com
Security Level: Email, Account Authentication (None)

Signature



Signature Adoption: Drawn on Device
Using IP Address:
2607:fb91:22b0:8b6c:c175:f0d4:2eda:d2b7
Signed using mobile

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Electronic Record and Signature Disclosure:
Not Offered via Docusign

| In Person Signer Events | Signature | Timestamp |
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| Editor Delivery Events | Status | Timestamp |
| Agent Delivery Events | Status | Timestamp |
| Intermediary Delivery Events | Status | Timestamp |
| Certified Delivery Events | Status | Timestamp |
| Carbon Copy Events | Status | Timestamp |
| Witness Events | Signature | Timestamp |
| Notary Events | Signature | Timestamp |
| Envelope Summary Events | Status | Timestamps |
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