



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

February 10, 2026

PUBLIC ACCESS OPINION 26-002
(Request for Review 2025 PAC 90290)

FREEDOM OF INFORMATION ACT:
Disclosure of Termination Letter
Where Public Employee Criminally
Charged with Official Misconduct

Mr. Felix Sarver
Reporter
The Herald-News
1100 Essington Road, Suite 4
Joliet, Illinois 60435

Mr. Kevin J. Meyers
Assistant State's Attorney
Will County State's Attorney's Office
57 North Ottawa Street, 6th Floor
Joliet, Illinois 60432

Dear Mr. Sarver and Mr. Meyers:

This binding opinion is issued by the Attorney General pursuant to section 9.5(f) of the Freedom of Information Act (FOIA).¹ For the reasons discussed below, this office concludes that the Will County State's Attorney's Office (State's Attorney's Office) improperly withheld the termination letter responsive to Mr. Felix Sarver's October 10, 2025, FOIA request.

On that date, Mr. Sarver, on behalf of *The Herald-News*, submitted a FOIA request to the State's Attorney's Office via e-mail seeking, in relevant part, electronic copies of "[r]ecords showing any written and electronic communication issued to Amy Burgett-Masse

¹ 5 ILCS 140/9.5(f) (West 2024), as amended by Public Act 104-438, effective January 1, 2026.

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regarding the status of her employment, such as suspensions, resignations or terminations."² On October 20, 2025, the State's Attorney's Office extended its time to respond to the request by five business days pursuant to three subsections of section 3(e) of FOIA (5 ILCS 140/3(e)(ii), (e)(v), (e)(vi) (West 2024)).³ On October 28, 2025, the State's Attorney's Office responded by withholding Ms. Burgett-Masse's termination letter pursuant to sections 7(1)(d)(i) and 7(1)(d)(iii) of FOIA.⁴ The State's Attorney's Office asserted that the letter "contains non-public information about the events leading to her termination, which would interfere with the pending criminal prosecution and picking of a jury."⁵ On October 29, 2025, Mr. Sarver submitted the above-referenced Request for Review challenging the withholding of the termination letter.⁶

On November 6, 2025, the Public Access Bureau sent the State's Attorney's Office an e-mail⁷ with a copy of the Request for Review and an inquiry letter asking the State's Attorney's Office to provide an unredacted copy of the withheld termination letter for this office's confidential review, as well as a detailed written explanation of the factual and legal bases for the applicability of the asserted exemptions.⁸ Having received no response, this office sent an additional letter to the State's Attorney's Office via e-mail⁹ on November 25, 2025,¹⁰ and attached a copy of the November 6, 2025, letter as well as another copy of the Request for Review. On December 8, 2025, the State's Attorney's Office provided this office with the

²E-mail from Felix Sarver, The Herald-News, Joliet, Illinois, to [Will County State's Attorney's Office FOIA Officer] (October 10, 2025).

³Letter from Toni M. Renken, Assistant State's Attorney, State's Attorney of Will County, to Felix Sarver, The Herald-News, Joliet, Illinois (October 20, 2025).

⁴5 ILCS 140/7(1)(d)(i), (1)(d)(iii) (West 2024).

⁵Letter from Kevin Meyers, Assistant State's Attorney, State's Attorney of Will County, to Felix Sarver (October 28, 2025).

⁶E-mail from Felix Sarver, The Herald-News, to Public Access [Bureau], [Office of the Attorney General] (October 29, 2025).

⁷E-mail from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Illinois Attorney General's Office, to [Kevin Meyers, Assistant State's Attorney, State's Attorney of Will County] (November 6, 2025).

⁸Letter from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Kevin Meyers, Assistant State's Attorney, Will County State's Attorney's Office (November 6, 2025), at 2.

⁹E-mail from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Illinois Attorney General's Office, to [Kevin Meyers, Assistant State's Attorney, State's Attorney of Will County] (November 25, 2025).

¹⁰Letter from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Kevin Meyers, Assistant State's Attorney, Will County State's Attorney's Office (November 25, 2025).

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requested materials,¹¹ including a written answer for this office to forward to Mr. Sarver¹² as well as information provided confidentially for this office's consideration.¹³ On December 10, 2025, this office forwarded a copy of the State's Attorney's Office's non-confidential response to Mr. Sarver and notified him of his opportunity to reply.¹⁴ Mr. Sarver did not reply.

On December 23, 2025, the Public Access Bureau extended the time within which to issue a binding opinion by 30 business days to February 10, 2026, pursuant to section 9.5(f) of FOIA.¹⁵

ANALYSIS

It is the public policy of the State of Illinois that "all persons are entitled to full and complete information regarding the affairs of government and the official acts and policies of those who represent them as public officials and public employees consistent with the terms of" FOIA. 5 ILCS 140/1 (West 2024). Under FOIA, "[a]ll records in the custody or possession of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt." 5 ILCS 140/1.2 (West 2024).

Sections 7(1)(d)(i) and 7(1)(d)(iii) of FOIA

Sections 7(1)(d)(i) and 7(1)(d)(iii) of FOIA exempt from disclosure:

(d) Records in the possession of any public body created in the course of administrative enforcement proceedings, and any law enforcement or correctional agency **for law enforcement purposes**, but only to the extent that disclosure would:

¹¹E-mail from Kevin Meyers to [Katie] Goldsmith (December 8, 2025).

¹²Letter from Kevin J. Meyers, Assistant State's Attorney, State's Attorney of Will County, to AAG Katie Goldsmith, Illinois Attorney General's Office (undated).

¹³See 5 ILCS 140/9.5(d) (West 2024), as amended by Public Act 104-438, effective January 1, 2026 ("The Public Access Counselor shall forward a copy of the answer to the person submitting the request for review, with any alleged confidential information to which the request pertains redacted from the copy.").

¹⁴Letter from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Felix Sarver, The Herald-News (December 10, 2025).

¹⁵Letter from Katie Goldsmith, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Felix Sarver, The Herald-News, and Kevin Meyers, Assistant State's Attorney, Will County State's Attorney's Office (December 23, 2025).

(i) interfere with pending or actually and reasonably contemplated law enforcement proceedings conducted by any law enforcement or correctional agency that is the recipient of the request; [or]

* * *

(iii) create a substantial likelihood that a person will be deprived of a fair trial or an impartial hearing[.]
(Emphasis added.)

In construing a statute, the primary objective is to ascertain and give effect to the intent of the General Assembly. *Southern Illinoisan v. Illinois Department of Public Health*, 218 Ill. 2d 390, 415 (2006). "[T]he surest and most reliable indicator of" legislative intent "is the statutory language itself, given its plain and ordinary meaning." *Board of Education of Springfield School District No. 186 v. Attorney General of Illinois*, 2017 IL 120343, ¶ 24. "It is appropriate to use a dictionary to ascertain the meaning of an otherwise undefined word or phrase." *Poris v. Lake Holiday Property Owners Ass'n*, 2013 IL 113907, ¶ 48.

Because the State's Attorney's Office did not assert or provide any information to this office indicating that the termination letter was created in the course of administrative enforcement proceedings, the exemptions in section 7(1)(d) are potentially applicable only if the letter is maintained by a correctional or law enforcement agency "for law enforcement purposes[.]" FOIA does not define "law enforcement." Black's Law Dictionary defines "law enforcement" as "[t]he detection and punishment of violations of the law[.]" including both criminal and noncriminal laws. Black's Law Dictionary 1056 (12th ed. 2024).

Although the State's Attorney's Office is clearly a law enforcement agency that investigates and prosecutes crimes, the termination letter was not used in connection with those law enforcement functions. Instead, the letter is a personnel record that the State's Attorney's Office created to document the termination of Ms. Burgett-Masse's employment. The letter contains certain information that derives from a law enforcement investigation, but it is not a record maintained by the State's Attorney's Office "for law enforcement purposes." On that basis alone, the record is not exempt from disclosure under section 7(1)(d)(i) or 7(1)(d)(iii) of FOIA. Nevertheless, this office will analyze whether the State's Attorney's Office may withhold the termination letter under those exemptions if the letter somehow could be considered a record that was created for law enforcement purposes.

Under section 7(1)(d)(i) of FOIA, "[t]he classification of information as 'law enforcement' or 'investigatory' does not necessarily foreclose access unless it can be shown, in a particular case, that disclosure would interfere with law enforcement and would, therefore, not be in the public interest." *Baudin v. City of Crystal Lake*, 192 Ill. App. 3d 530, 536 (1989).

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As for section 7(1)(d)(iii) of FOIA, the exemption corresponds with a Federal FOIA provision (5 U.S.C. § 552(b)(7)(B) (2018)) that exempts from disclosure records compiled for law enforcement purposes to the extent that disclosure "would deprive a person of a right to a fair trial or an impartial adjudication[.]" Although Illinois reviewing courts have not published any opinions analyzing the applicability of section 7(1)(d)(iii), federal courts¹⁶ have held that a public body withholding records pursuant to the "fair trial" exemption, must establish: "(1) that a trial or adjudication is pending or truly imminent; and (2) that it is more probable than not that disclosure of the material sought would seriously interfere with the fairness of those proceedings." *Washington Post Co. v. U.S. Department of Justice*, 863 F.2d 96, 102 (D.C. Cir. 1988); see also *Chiquita Brands International, Inc. v. U.S. Securities & Exchange Comm'n*, 805 F.3d 289, 298 (D.C. Cir. 2015) (the exemption applies "when the release of documents would likely deprive a party of a fair trial[.]"). The Illinois Supreme Court has determined that "the appropriate time to measure whether a public record may be withheld is when the public body asserts the exemption and denies the request." *Green v. Chicago Police Department*, 2022 IL 127229, ¶ 72.

In its non-confidential response to this office, the State's Attorney's Office explained that Ms. Burgett-Masse is a former State's Attorney's Office employee who was terminated for alleged misconduct and is currently subject to five felony counts in a pending circuit court case; her adult daughter also has been charged.¹⁷ According to news media coverage, Ms. Burgett-Masse has been charged with computer tampering, aggravated computer tampering, and official misconduct.¹⁸ The news article quotes the information filed by the special prosecutor as to each of the alleged offenses, such as:

The aggravated computer tampering charge accuses the mother and her daughter of accessing the State's Attorney's Office computer, computer network or a program or data and removing data "from said computer network" and creating "a strong probability of death or great bodily harm to one or more individuals, * * * identified as

¹⁶Illinois courts have recognized that because Illinois' FOIA statute is based on the Federal FOIA statute, decisions construing the latter, while not controlling, may provide helpful and relevant precedent in construing the state Act. See *Margolis v. Director, Illinois Department of Revenue*, 180 Ill. App. 3d 1084, 1087 (1989). See Ill. Att'y Gen. Pub. Acc. Op. No. 19-008, issued September 24, 2019, at 7-8 (applying federal authority interpreting Federal FOIA exemption 7(B) to public record withheld under section 7(1)(d)(iii) of Illinois FOIA).

¹⁷Letter from Kevin J. Meyers, Assistant State's Attorney, State's Attorney of Will County, to AAG Katie Goldsmith, Illinois Attorney General's Office (undated), at [1].

¹⁸John Ferak, *Will County State's Attorney Employee, Daughter Charged With 5 Crimes: Special Prosecutor*, Patch (October 7, 2025), <https://patch.com/illinois/joliet/will-county-states-attorney-employee-daughter-charged-5-crimes-neal>.

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witnesses in certain criminal investigations and prosecutions in Will County."^[19]

In addition, the news article reported that Ms. "Burgett-Masse is accused of allowing her 20-year-old daughter access to the workstations at the Will County State's Attorney's Office, which allowed her daughter to allegedly furnish information from various police reports and investigations to people she knew who were under criminal investigation."²⁰

In its non-confidential response, the State's Attorney's Office asserted that "[d]ue to the nature of the allegations, there has understandably been media interest in this case."²¹ The State's Attorney's Office contended that the section 7(1)(d)(iii) exemption applies because:

[B]oth Ms. Burgett-Masse and her daughter still retain their constitutional rights, among them are the right to fair and impartial trial. The withheld letter contains the specific details of the alleged crimes Ms. Burgett-Masse committed. Those details are beyond what has been publicly released and more specific than what is listed in the indictment. Those details also have evidentiary value and will likely to be [*sic*] introduced at trial. At the current time, the judge presiding over Ms. Burgett-Masse's case will decided [*sic*] what evidence will be properly brought before the jury. That judge can weigh the relevancy of the information, whether any privilege applies, or whether there is some reason why the jury shouldn't hear that piece of information. However, should those details be released before jury selection, there will be no safeguard. The information will be generally available to the public. Potential jurors will have access to the information outside the court process. Every attempt will be made to make sure that those issues are avoided, but it will remain a problem created by the release."^[22]

¹⁹John Ferak, *Will County State's Attorney Employee, Daughter Charged With 5 Crimes: Special Prosecutor*, Patch (October 7, 2025), <https://patch.com/illinois/joliet/will-county-states-attorney-employee-daughter-charged-5-crimes-neal>.

²⁰John Ferak, *Will County State's Attorney Employee, Daughter Charged With 5 Crimes: Special Prosecutor*, Patch (October 7, 2025), <https://patch.com/illinois/joliet/will-county-states-attorney-employee-daughter-charged-5-crimes-neal>.

²¹Letter from Kevin J. Meyers, Assistant State's Attorney, State's Attorney of Will County, to AAG Katie Goldsmith, Illinois Attorney General's Office (undated), at [1].

²²Letter from Kevin J. Meyers, Assistant State's Attorney, State's Attorney of Will County, to AAG Katie Goldsmith, Illinois Attorney General's Office (undated), at [1].

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The State's Attorney's Office also argued that disclosure of the termination letter would hinder the prosecution for the following reasons:

[R]eleasing information generally to the public before trial hinders the ability of law enforcement and prosecutors to [elicit] and fact check information. By releasing the extent of the information collected thus far, a number of problems are created. First, it hinders the ability of law enforcement and prosecutors to judge whether an individual has accurate information as a witness. First, it could likely be assumed that witnesses will have their recollection affected by the release of information into the public. It will also become difficult for those same individuals to determine when someone is falsely portraying themselves as a witness. Additionally, it will tell others who may be related to the allegations against Ms. Burgett-Masse just what information law enforcement has discovered. This will allow them to mold any stories they may have.^[23]

This office has reviewed the termination letter and considered the State's Attorney's Office's confidential and non-confidential responses, as well as information publicly available on the Will County Circuit Clerk's website.²⁴ Even if a trial or adjudication had been pending or truly imminent at the time the State's Attorney's Office denied the request, the State's Attorney's Office did not demonstrate that disclosure of the termination letter would create a substantial likelihood that Ms. Burgett-Masse would be deprived of a fair trial. While the State's Attorney's Office emphasized that the court has yet to rule on the admissibility of information in the termination letter, no provision of FOIA provides a blanket exemption for records that may contain information that may be inadmissible in court. Public dissemination of potentially prejudicial evidence could possibly interfere with a defendant's right to a fair trial in certain circumstances by, for example, tainting the jury pool in a small community where the underlying case was the subject of intensive media coverage. The State's Attorney's Office's response did not illustrate that revealing previously undisclosed information in the termination letter is likely to garner intense pre-trial publicity that could taint the pool of potential jurors in a county with a population as sizeable as Will County's.²⁵ Also, even if some potential jurors were exposed to the letter, *voir dire* may be used to identify and exclude potential jurors whose knowledge of

²³Letter from Kevin J. Meyers, Assistant State's Attorney, State's Attorney of Will County, to AAG Katie Goldsmith, Illinois Attorney General's Office (undated), at [1-2].

²⁴Case Docketed Events, *People v. Burgett-Masse*, Docket no. 2025-CF-1806 (Circuit Court, Will County, October 10, 2025), <https://ipublic.il12th.org/>.

²⁵The most recent census estimated that Will County had a population of 708,583 as of July 1, 2024. United States Census Bureau, QuickFacts, Will County, Illinois, <https://www.census.gov/quickfacts/fact/table/willcountyillinois/PST045224> (last visited January 28, 2026).

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relevant information may render them unable to be impartial. *Chiquita Brands International, Inc. v. U.S. Securities & Exchange Comm'n*, 10 F. Supp. 3d 1, 5-6 (D.D.C. 2010) (defendant seeking to prevent disclosure of records under FOIA "failed to show why common judicial safeguards such as *voir dire* would be insufficient to ensure fairness where there is a" large and diverse jury pool). The State's Attorney's Office did not show that such safeguards would be insufficient.

Furthermore, the State's Attorney's Office's generalized arguments about impacting witness testimony and revealing the extent of the information law enforcement had discovered fall short of proving by clear and convincing evidence that the information contained within the termination letter would interfere with a law enforcement proceeding such as the prosecution of Ms. Burgett-Masse and her daughter.²⁶ Unlike an internal investigative report that is maintained solely within its office or shared only with its investigation partners, the State's Attorney's Office delivered the letter at issue to Ms. Burgett-Masse and did not claim that she was precluded from sharing it with whomever she pleased, including witnesses. The letter contains certain allegations that do not appear to have been reported by the news media or otherwise publicly disseminated or made available to the public in court records, but it does not contain highly specific details such as the identities of witnesses or disclose evidentiary proof or sources of evidence upon which the allegations are based. This office's review did not find a basis to conclude that disclosing the letter pursuant to FOIA would reveal the extent of the evidence the State's Attorney's Office had discovered about the alleged offenses or sensitive details that would materially impact witness testimony.

Confidential Argument

The State's Attorney's Office provided a separate paragraph of information for this office's confidential review, which made an additional argument for why it properly withheld the termination letter in its entirety. While this office is not at liberty to reveal the details of the State's Attorney's Office's confidential argument, it is largely conclusory and generally takes a standard from one context that does not apply in the different context contemplated here. Moreover, as with the non-confidential argument, it does not account for methods for ensuring the impartiality of potential jurors such as *voir dire*. As such, the confidential argument is unpersuasive.

²⁶This office also notes that by its plain language, the section 7(1)(d)(i) exemption is applicable only if the disclosure of records would "interfere with pending or actually and reasonably contemplated law enforcement proceedings **conducted by any law enforcement or correctional agency that is the recipient of the request[.]**" (Emphasis added.) But see *Kelly v. Village of Kenilworth*, 2019 IL App (1st) 170780, ¶ 33 (concluding that a public body conducting an ongoing law enforcement investigation could assert the section 7(1)(d)(i) exemption on behalf of other public bodies that previously participated but were no longer involved in the investigation in order to foster cooperation among law enforcement agencies). The available information indicates that a special prosecutor rather than the State's Attorney's Office was conducting a law enforcement proceeding involving Ms. Burgett-Masse at the time of Mr. Sarver's request; the State's Attorney's Office has not established whether or the extent to which it previously participated in that proceeding.

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Because the termination letter is not a record maintained by the State's Attorney's Office for law enforcement purposes and because the State's Attorney's Office did not prove by clear and convincing evidence that disclosure of the termination letter would interfere with law enforcement proceedings or create a substantial likelihood that a person would be deprived of a fair trial, the State's Attorney's Office improperly withheld the termination letter under sections 7(1)(d)(i) and 7(1)(d)(iii) of FOIA.

FINDINGS AND CONCLUSIONS

After full examination and giving due consideration to the information submitted, the Public Access Counselor's review, and the applicable law, the Attorney General finds that:

1) On October 10, 2025, Mr. Felix Sarver, on behalf of *The Herald-News*, submitted a FOIA request to the Will County State's Attorney's Office seeking, in relevant part, copies of records showing communications issued to Amy Burgett-Masse regarding the status of her employment, such as suspensions, resignations, or terminations.

2) On October 20, 2025, the State's Attorney's Office extended the time to respond to the request by five business days pursuant to section 3(e) of FOIA.

3) On October 28, 2025, the State's Attorney's Office denied the request for Ms. Burgett-Masse's termination letter pursuant to sections 7(1)(d)(i) and 7(1)(d)(iii) of FOIA.

4) On October 29, 2025, Mr. Sarver submitted the above-referenced Request for Review contesting the withholding of Ms. Burgett-Masse's termination letter. Mr. Sarver's Request for Review was timely filed and otherwise complies with the requirements of section 9.5(a) of FOIA (5 ILCS 140/9.5(a) (West 2024), as amended by Public Act 104-438, effective January 1, 2026).

5) On November 6, 2025, the Public Access Bureau forwarded a copy of the Request for Review to the State's Attorney's Office together with a letter asking for an unredacted copy of the termination letter for this office's confidential review. The letter also requested a detailed written explanation of the factual and legal bases for the applicability of the specific exemptions under which the State's Attorney's Office withheld the letter.

6) Having received no response, on November 25, 2025, the Public Access Bureau sent an additional letter to the State's Attorney's Office requesting an unredacted copy of the termination letter and the State's Attorney's Office's written explanation for withholding the letter. The Public Access Bureau attached a copy of the November 6, 2025, letter as well as another copy of the Request for Review.

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7) On December 8, 2025, the State's Attorney's Office furnished the requested materials to this office, including a complete version of its answer for this office's confidential review and a non-confidential version to forward to Mr. Sarver.

8) On December 10, 2025, this office forwarded a copy of the State's Attorney's Office's non-confidential response letter to Mr. Sarver and notified him of his opportunity to reply. Mr. Sarver did not reply.

9) On December 23, 2025, the Public Access Bureau extended the time within which to issue a binding opinion by 30 business days, to February 10, 2026, pursuant to section 9.5(f) of FOIA. Accordingly, the Attorney General may properly issue a binding opinion with respect to this matter.

10) To qualify for any exemption in section 7(1)(d) of FOIA, a record must either be (1) created in the course of administrative enforcement proceedings, or (2) possessed by "any law enforcement or correctional agency for law enforcement purposes[.]"

11) The State's Attorney's Office has not asserted or provided any indication that the termination letter was created in the course of an administrative enforcement proceeding.

12) Although the State's Attorney's Office is a law enforcement agency that investigates and prosecutes crimes, the termination letter was not created for such a law enforcement purpose. Instead, the letter is a personnel record that documents the termination of Ms. Burgett-Masse's employment. Because the termination letter is not a record possessed by the State's Attorney's Office for a law enforcement purpose, it does not satisfy the threshold requirement to be exempt under section 7(1)(d)(i) or section 7(1)(d)(iii) of FOIA.

13) Section 7(1)(d)(i) of FOIA exempts from disclosure law enforcement records only to the extent that disclosure would "interfere with pending or actually and reasonably contemplated law enforcement proceedings conducted by any law enforcement or correctional agency that is the recipient of the request[.]"

14) The State's Attorney's Office's generalized arguments about section 7(1)(d)(i) of FOIA do not demonstrate that the exemption applies to the termination letter. Accordingly, the State's Attorney's Office has not sustained its burden of proving that the termination letter is exempt from disclosure under section 7(1)(d)(i) of FOIA.

15) Section 7(1)(d)(iii) of FOIA exempts from disclosure law enforcement records only to the extent that disclosure would "create a substantial likelihood that a person will be deprived of a fair trial or an impartial hearing[.]"

16) The State's Attorney's Office did not demonstrate that disclosure of the termination letter would deprive Ms. Burgett-Masse or any other party of a fair trial or impartial

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hearing. Therefore, the State's Attorney's Office did not prove that the termination letter is exempt from disclosure under section 7(1)(d)(iii) of FOIA.

17) The information the State's Attorney's Office provided in its confidential response does not support the State's Attorney's Office's assertion that the termination letter is exempt from disclosure.

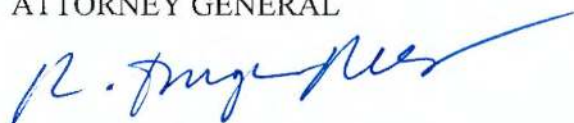
Therefore, it is the opinion of the Attorney General that the Will County State's Attorney's Office has violated FOIA by improperly withholding the termination letter responsive to Mr. Sarver's FOIA request. Accordingly, the State's Attorney's Office is hereby directed to take immediate and appropriate action to comply with this opinion by disclosing a copy of the termination letter in a supplemental response to Mr. Sarver's request. Pursuant to section 7(1)(b) of FOIA,²⁷ the State's Attorney's Office may properly redact as "private information" the home address, personal e-mail address, and individual's signature that appear in the termination letter.²⁸ Pursuant to section 7(1)(c) of FOIA,²⁹ the State's Attorney's Office also may redact the name of the person listed in section (2)b of the letter.

This opinion shall be considered a final decision of an administrative agency for the purposes of administrative review under the Administrative Review Law. 735 ILCS 5/3-101 *et seq.* (West 2024). An aggrieved party may obtain judicial review of the decision by filing a complaint for administrative review with the Circuit Court of Cook County or Sangamon County within 35 days of the date of this decision naming the Attorney General of Illinois and Mr. Felix Sarver as defendants. *See* 5 ILCS 140/11.5 (West 2024).

Sincerely,

KWAME RAOUL
ATTORNEY GENERAL

By:



R. Douglas Rees
Chief Deputy Attorney General

²⁷5 ILCS 140/7(1)(b) (West 2024) (exempting from disclosure "[p]rivate information, unless disclosure is required by another provision of this Act, a State or federal law, or a court order.").

²⁸The Public Access Bureau has consistently concluded that a person's signature is a unique identifier, which may be redacted pursuant to section 7(1)(b) of FOIA. *See* Ill. Att'y Gen. Pub. Acc. Op. No. 14-015, issued November 25, 2014, at 11.

²⁹5 ILCS 140/7(1)(c) (West 2024) (exempting from disclosure "[p]ersonal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy[.]").

CERTIFICATE OF SERVICE

Benjamin J. Silver, Supervising Attorney, Public Access Bureau, hereby certifies that he has served a copy of the foregoing Binding Opinion (Public Access Opinion 26-002) upon:

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by causing a true copy thereof to be sent electronically to the addresses as listed above and by causing to be mailed a true copy thereof in correctly addressed, prepaid envelopes to be deposited in the United States mail at Chicago, Illinois on February 10, 2026.



Benjamin J. Silver
Supervising Attorney

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