



E-Notice

2016-CH-01472

CALENDAR: 11

To: Alice Christine Svenson
christine@svensonlawoffices.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

**JUDICIAL WATCH vs. OFFICE OF THE MAYOR OF THE CIT
2016-CH-01472**

The transmission was received on 02/02/2016 at 1:55 PM and was ACCEPTED with
the Clerk of the Circuit Court of Cook County on 02/02/2016 at 1:57 PM.

CHANCERY_ACTION_COVER_SHEET (CHANCERY DIVISION)

COMPLAINT

Filer's Email: christine@svensonlawoffices.com
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Notice Date: 2/2/2016 1:57:32 PM
Total Pages: 5

DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY
RICHARD J. DALEY CENTER, ROOM 1001
CHICAGO, IL 60602

(312) 603-5031
courtclerk@cookcountycourt.com

IN THE CIRCUIT CIVIL COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, COUNTY DIVISION

JUDICIAL WATCH					
v.		Plaintiff	}	No.	ELECTRONICALLY FILED 2/2/2016 1:55 PM 2016-CH-01472 CALENDAR: 11 CIRCUIT COURT OF COOK COUNTY, ILLINOIS CHANCERY DIVISION CLERK DOROTHY BROWN
OFFICE OF THE MAYOR OF THE CIT		Defendant			

CHANCERY DIVISION CIVIL COVER SHEET
GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the line in front of the appropriate category which best characterizes your action being filed.

0005 ☐ Administrative Review
 0001 ☐ Class Action
 0002 ☒ Declaratory Judgment
 0004 ☐ Injunction

0007 ☐ General Chancery
 0010 ☐ Accounting
 0011 ☐ Arbitration
 0012 ☐ Certiorari
 0013 ☐ Dissolution of Corporation
 0014 ☐ Dissolution of Partnership
 0015 ☐ Equitable Lien
 0016 ☐ Interpleader
 0017 ☐ Mandamus
 0018 ☐ Ne Exeat

0019 ☐ Partition
 0020 ☐ Quiet Title
 0021 ☐ Quo Warranto
 0022 ☐ Redemption Rights
 0023 ☐ Reformation of a Contract
 0024 ☐ Rescission of a Contract
 0025 ☐ Specific Performance
 0026 ☐ Trust Construction
 0027 ☐ Foreign Transcript
 0085 ☐ Petition to Register Foreign Judgment
☐ Other (specify) _____

By: /s/ ALICE CHRISTINE SVENSON

Attorney

Pro Se

Atty. No.: 44565
 Name: SVENSON A CHRISTINE
 Atty. for: JUDICIAL WATCH
 Address: 505 N LASALLE 350
 City/State/Zip: CHICAGO, IL 60654
 Telephone: (312) 467-2900

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JUDICIAL WATCH, INC.,

Plaintiff,

vs.

THE OFFICE OF THE MAYOR
OF THE CITY OF CHICAGO

and

RAHM EMANUEL, in his
official capacity as Mayor of the
city of Chicago

Defendant.

Case No.:

In Chancery

Injunction/Temporary Restraining Order

**COMPLAINT IN CHANCERY FOR DECLARATORY
JUDGMENT AND INJUNCTIVE RELIEF**

NOW COMES Plaintiff, Judicial Watch, Inc., by and through its attorney, and prays this Court render a declaratory judgment and grant injunctive relief under the Freedom of Information Act ("FOIA"), 5 ILCS § 140/1, *et seq.* For its Complaint, Plaintiff states as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this action pursuant to 5 ILCS § 140/11(d).
2. Venue is proper in Cook County pursuant to 5 ILCS § 140/11(c).

PARTIES

3. Plaintiff Judicial Watch, Inc. is a not-for-profit, educational organization that seeks to promote transparency, integrity, and accountability in government and fidelity to the rule of law. As part of its educational mission, Plaintiff regularly requests records under federal and state "open records" laws, analyzes the responses and any records it receives, and

disseminates its findings and the records to the American public to inform them about “what their government is up to.” *U.S. Dep’t of Justice v. Reporters Committee for Freedom of the Press*, 489 U.S. 749, 795 (1989).

4. Defendants are the Office of the Mayor of the City of Chicago (“the Mayor’s Office”), a “public body” as that term is defined by 5 ILCS § 140/2(a), and Rahm Emanuel, who is being sued in his official capacity as Mayor, the “head of the public body” as that term is defined by 5 ILCS § 140/2(e).

STATEMENT OF FACTS

5. On December 29, 2015, Plaintiff submitted a FOIA request on the Mayor’s Office, seeking access to all records reflecting expenses incurred by Mayor Rahm Emanuel, his family, and any companions on a trip that they made to Cuba in December 2015.

6. Plaintiff submitted the FOIA request by certified mail to be delivered by the United States Postal Service.

7. According to records of the United States Postal Service, the FOIA request was received by Defendants on January 5, 2016.

8. Pursuant to 5 ILCS § 140/3(d), Defendants were required to either comply with or deny Plaintiff’s FOIA request within five business days after their receipt of the request.

9. Defendants’ response to Plaintiff’s FOIA request was due by January 12, 2016 at the latest.

10. As of the date of this Complaint, Defendants have failed to comply with Plaintiff’s FOIA request, to extend the time for responding to the request, or to deny the request.

11. Defendants' failure to respond is considered a denial of the request. 5 ILCS § 140/3(d). In addition, Plaintiff is deemed to have exhausted its administrative remedies. 5 ILCS § 140/9(c)

COUNT ONE
(Violation of FOIA, 5 ILCS § 140/1, *et seq.*)

12. Plaintiff reaffirms paragraphs 1-11 as though fully restated herein.

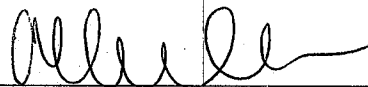
13. Plaintiff is being irreparably harmed by Defendants' failure to respond to Plaintiff's December 29, 2015 FOIA request, as Plaintiff is being denied its legal right to inspect public records.

14. Plaintiff has no adequate remedy at law.

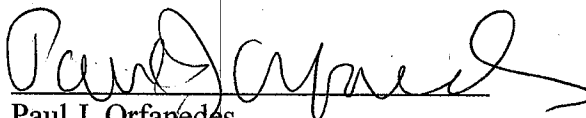
WHEREFORE, Plaintiff prays that the Court: (A) Declare Defendants to be in violation of the Illinois Freedom of Information Act, 5 ILCS §140/1, *et seq.*; (B) Enjoin Defendants from continuing to withhold access to any and all non-exempt public records responsive to Plaintiff's December 29, 2015 FOIA request and further enjoin Defendants to produce any and all such records to Plaintiff without further delay; (C) Order Defendants to prepare, forthwith, an affidavit declaring that they have fully and completely complied with Plaintiff's December 29, 2015 FOIA request and further declaring that any and all non-exempt public records responsive to the request have been produced to Plaintiff; (D) Order Defendants to prepare, forthwith, an affidavit identifying with specificity any and all public records responsive to Plaintiff's December 29, 2015 FOIA request that are claimed to be subject to legal exemption from disclosure and further identifying with specificity the reason(s) for any such claim of exemption; (E) Award Plaintiff reasonable attorneys' fees and costs; and (F) Order such other and further relief as the Court finds just and equitable.

Dated: February 1, 2016

Respectfully submitted,



Christine Svenson
Ill. Bar No. 6230370
Cook County Attorney ID No. 44565
SVENSON LAW OFFICES
505 N. LaSalle Street, Suite 350
Chicago, IL 60654
Tel: (312) 467-2900
Fax: (312) 467-2902



Paul J. Orfanedes
Ill. Bar No. 6205255
Cook County Attorney ID No. 43158
JUDICIAL WATCH, INC.
425 Third Street, S.W., Suite 800
Washington, DC 20024
Tel: (202) 646-5172
Fax: (202) 646-5199

Counsel for Plaintiff

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☒ SUMMONS

☐ ALIAS - SUMMONS

(2/18/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JUDICIAL WATCH;

(Name all parties)

v.

OFFICE OF THE MAYOR OF THE CIT

No. 2016-CH-01472

Defendant Address:

OFFICE OF THE MAYOR OF THE CIT
121 N. LASALLE
SUITE 600
CHICAGO, IL 60602

Summons

To each Defendant: ☒ SUMMONS

☐ ALIAS - SUMMONS

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 802, Chicago, Illinois 60602

☐ District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077

☐ District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008

☐ District 4 - Maywood
1500 Maybrook Ave.
Maywood, IL 60153

☐ District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455

☐ District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60426

☐ Child Support
28 North Clark St., Room 200
Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

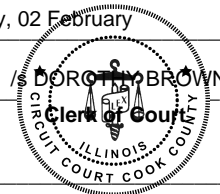
IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 44565
Name: SVENSON A CHRISTINE
Atty. for: JUDICIAL WATCH
Address: 505 N LASALLE 350
City/State/Zip: CHICAGO, IL 60654
Telephone: (312) 467-2900

WITNESS, Tuesday, 02 February, 2016



Date of service: _____

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at: _____
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/s/ DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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☒ SUMMONS

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(2/18/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JUDICIAL WATCH;

(Name all parties)

v.

RAHM EMANUEL

No. 2016-CH-01472

Defendant Address:

RAHM EMANUEL
121 N. LASALLE
SUITE 600
CHICAGO, IL 60602

Summons

To each Defendant: ☒ SUMMONS

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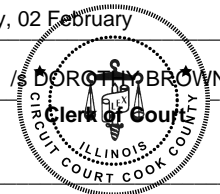
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Address: 505 N LASALLE 350
City/State/Zip: CHICAGO, IL 60654
Telephone: (312) 467-2900

WITNESS, Tuesday, 02 February, 2016



Date of service: _____

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Chancery DIVISION

Litigant List

Printed on 02/02/2016

Case Number: 2016-CH-01472

Page 1 of 1

Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
JUDICIAL WATCH				

Total Plaintiffs: **1**

Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
OFFICE OF THE MAYOR OF THE CIT	121 N. LASALLE CHICAGO,	IL	60602 SUITE 600	Sheriff-Clerk
RAHM EMANUEL	121 N. LASALLE CHICAGO,	IL	60602 SUITE 600	Sheriff-Clerk

Total Defendants: **2**