

**IN THE CIRCUIT COURT OF SANGAMON COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	Case No.: 2025CH000057
)	
vs.)	In Chancery
)	Injunction/Temporary Restraining Order
OFFICE OF THE GOVERNOR,)	
)	
Defendant.)	
_____)	

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

NOW COMES Plaintiff, Judicial Watch, Inc., by and through its attorneys, CHALMERS, ADAMS, BACKER & KAUFMAN, LLC, and prays that this Court render a declaratory judgment and grant injunctive relief under the Freedom of Information Act, 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 Sangamon County pursuant to 5 ILCS § 140/11(c).

PARTIES

3. Plaintiff Judicial Watch, Inc. is a not-for-profit, educational organization incorporated under the laws of the District of Columbia. Plaintiff seeks to promote transparency, accountability, and integrity in government and fidelity to the rule of law. As part of its mission, Plaintiff regularly requests records from public bodies, analyzes the responses it receives, and disseminates its findings to the American public to inform them about “what their government is up to.”

4. Defendant Office of the Governor of Illinois is a “public body” as defined by 5 ILCS § 140/2(a). Defendant has possession, custody, and control of the public records to which Plaintiff seeks access. *See* 5 ILCS 140/2(c).

STATEMENT OF FACTS

5. On August 3, 2025, Governor JB Pritzker stated that the state of Illinois would assist Texas Democratic legislators seeking refuge in Illinois. Caroline Vakil, *Pritzker says Texas Democrats who fled state will be protected amid arrest threats*, THE HILL (Aug. 3, 2025, available at <https://thehill.com/homenews/5434627-redistricting-battle-texas-illinois/>). Specifically, he said, “They’re here in Illinois. We’re going to do everything we can to protect every single one of them and make sure that — ’cause we know they’re doing the right thing, we know that they’re following the law.” *Id.*

6. According to the Texas Tribune, “[Governor] Pritzker’s involvement began at a dinner in late June hosted by Oklahoma Democrats, where he discussed the possibility of helping Texas Democrats fight back against the redistricting plan with state party chair Kendall Scudder.” Kayla Guo and Eleanor Klibanoff, *Texas House Democrats flee the state in bid to block GOP’s proposed congressional map*, THE TEXAS TRIBUNE (Aug. 3, 2025, available at <https://www.texastribune.org/2025/08/03/texas-democrats-quorum-break-redistricting-map/>). In addition, the paper reported that the governor “and his team are helping Texas Democratic lawmakers find lodging and meeting spaces.”

7. On August 6, 2025, Governor Pritzker appeared on The Late Show with Stephen Colbert. Steven Spearie, *Pritzker: Texas Democratic legislators who fled to Illinois are ‘heroes,’* SPRINGFIELD STATE JOURNAL-REGISTER (Aug. 7, 2025, available at <https://www.sjr.com/story/news/politics/2025/08/07/pritzker-said-fleeing-texas-legislators-are-welcome-in->

[illinois/85551253007/](https://www.youtube.com/watch?v=AJAXdjrDoHw)). When asked why the Texas legislators went to Illinois, the Governor responded, “The great heroes of the house democratic caucus decided the only thing they could do in order to stop it was leave Texas. And where did they decide to come to? The safe haven of the state of Illinois where we are going to protect them and take care of them.” THE LATE SHOW WITH STEPHEN COLBERT (Aug. 6, 2025, available at <https://www.youtube.com/watch?v=AJAXdjrDoHw>). Later in the interview, Colbert asked whether the FBI could arrest the Texas legislators located in Illinois. Governor Pritzker stated, “Frankly in the state of Illinois, we are not going to let them get taken away. We are going to protect the Texas House Democrats. ... As long as they are in Illinois, they are safe.” *Id.*

8. Governor Pritzker also spoke with NPR’s Juana Summers about the issue. Alejandra Marquez Janse, Juana Summers, and Patrick Jarenwattananon, *Illinois Gov. Pritzker on why his state is hosting Texas state lawmakers* (Aug. 6, 2025, available at <https://www.npr.org/2025/08/06/nx-s1-5493124/illinois-gov-pritzker-on-why-his-state-is-hosting-texas-state-lawmakers>). Summers started the interview with, “Governor, you invited these Texas Democrats to your state. Tell us why.” *Id.* Governor Pritzker responded, “Sure did. Well, we’re honored to host them here. And frankly, their courage, their commitment to serving and protecting the rights of Texans and the rights of all Americans inspired us. And I spoke with them weeks ago because this, we thought, would be a real possibility, that they'd have to leave to break a quorum. And indeed, that’s what’s happened.” *Id.*

9. In light of the repeated public statements by Governor Pritzker that the state of Illinois would protect the Texas legislators, Plaintiff submitted to the Governor’s Office a FOIA request seeking access to the following public records:

- A. All audio/visual recordings, handwritten notes, agendas, minutes, and reports related to a meeting or meetings held

between Governor Pritzker and congressional Democrats at which Texas congressional redistricting and/or Illinois possibly housing Texas Democratic state lawmakers was discussed.

- B. All audio/visual recordings, handwritten notes, agendas, minutes, and reports related to a meeting held between Governor Pritzker and Democratic party officials in late June 2025 in Oklahoma regarding congressional redistricting matters, as discussed at <https://www.msn.com/en-us/news/politics/inside-texas-democrats-plan-to-seek-refuge-with-illinois-gov-j-b-pritzker/ar-AA1JVS1T?ocid=socialshare>.
- C. All emails sent between and among officials in Governor Pritzker's immediate office, including but not limited to Governor Pritzker and his chief of staff, regarding Texas congressional redistricting.

The timeframe of the request was identified as "March 1, 2025, to present."

10. By letter dated August 8, 2025, the Governor's Office informed Plaintiff that "the Governor's Office did not find any records responsive" to the request.

11. Pursuant to 5 ILCS § 140/1, *et seq.*, Plaintiff requested that the Public Access Bureau review the "no records response" by the Governor's Office.

12. By letter dated September 3, 2025, the Governor's Office informed the Public Access Bureau that "a review of the Governor's calendar indicated that these meetings were non-state business."

13. The September 3, 2025 letter suggests, at a minimum, that at least some responsive public records exist: calendar entries. In addition, Governor Pritzker's statements at press conferences, on The Late Show with Stephen Colbert, and to the media, plainly suggest other public records exist. Therefore, on information and belief, the Governor's Office possesses public records responsive to Plaintiff's request.

14. To date, the Governor's Office has not produced any records responsive to Plaintiff's FOIA request.

COUNT ONE
(Failure to Conduct a Sufficient Search)

15. Plaintiff reaffirms paragraphs 1-14 as though fully restated herein.

16. Defendant is in violation of FOIA. Defendant failed to demonstrate that it conducted a search reasonably calculated to discover all records responsive to Plaintiff's FOIA request.

17. Defendant's failure to conduct a reasonable search prevented Defendant from producing all non-exempt, responsive records to Plaintiff. Plaintiff therefore is being irreparably harmed by Defendant's failure to conduct a reasonable search for records responsive to Plaintiff's FOIA request as Plaintiff is being denied its legal right to inspect public records.

18. Plaintiff has no adequate remedy at law.

COUNT TWO
(Failure to Produce All Non-Exempt Responsive, Records)

19. Plaintiff reaffirms paragraphs 1-18 as though fully restated herein.

20. Defendant failed to produce all non-exempt records responsive to Plaintiff's FOIA request.

21. Plaintiff is being irreparably harmed by Defendant's failure to produce all non-exempt, responsive records as Plaintiff is being denied its legal right to inspect public records.

22. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff prays that the Court: (A) declare Defendant to be in violation of the Illinois Freedom of Information Act, 5 ILCS §140/1, *et seq.*; (B) order Defendant to conduct a search reasonably calculated to discover the requested records and produce an affidavit describing its search efforts and demonstrating that its search was conducted in good faith; (C) order Defendant to produce any and all non-exempt, public records responsive to Plaintiff's

FOIA request; (D) enjoin Defendant from withholding access to non-exempt public records responsive to Plaintiff's FOIA; (E) order Defendant to prepare an affidavit identifying with specificity any and all public records responsive to Plaintiff's 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; (F) award Plaintiff reasonable attorneys' fees and costs; and (F) order such other and further relief as the Court finds just and equitable.

Dated: October 29, 2025

Respectfully submitted,

/s/ Christine Svenson

Christine Svenson
Cook County Attorney ID No. 44565
CHALMERS, ADAMS, BACKER
& KAUFMAN, LLC
345 N. Eric Drive
Palatine, IL 60067
Tel: 312.437.8629
Email: csvenson@chalmersadams.com

Counsel for Plaintiff