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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	Case No.:2026CH00302
)	
vs.)	In Chancery
)	Injunction/Temporary Restraining Order
CHICAGO TREASURER’S OFFICE,)	
)	
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 (“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. (“Plaintiff”) 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.”

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4. Defendant Chicago Treasurer's Office ("Defendant") 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 or about November 17, 2025, Chicago Treasurer Melissa Conyears-Ervin announced that the City of Chicago would boycott the purchase of United States Treasury securities to protest federal immigration enforcement operations in the city. Conyears-Ervin also announced her intention to seek authority from the Chicago City Council to divest the city of investments that derive their value from United States Treasury securities. *See* "Chicago Tribune" Melissa Conyears-Ervin: Chicago will not help fund Donald Trump's terror," *Chicago City Treasurer's Office News & Press*, (Nov. 17, 2025) (available at <https://chicagocitytreasurer.com/chicago-tribune-melissa-conyears-ervin-chicago-will-not-help-fund-donald-trumps-terror/>).

6. On November 17, 2025, Plaintiff submitted a FOIA request to Defendant seeking access to the following public records:

1. All internal CTO emails discussing whether or not to purchase U.S. Treasury debt in any form.
2. All emails sent to and from City Treasurer Melissa Conyears-Ervin making reference to "T-Bills", "T-bonds", "U.S. bonds", "Treasurys", "Trump", "ICE", "immigrants" and/or "immigration."
3. All CTO reports, studies, and analyses regarding the impact or non-impact on the City of Chicago of purchasing or not purchasing U.S. debt.

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

7. The request was submitted by email, to the email address for submitting FOIA requests listed on Defendant's website: CTOFOIA@cityofchicago.org. Plaintiff did not subsequently receive notification asserting that its email request was undeliverable or had not been delivered. On information and belief, Defendant received Plaintiff's emailed request the same day it was sent.

8. Defendant's website asserts that "[e]ach city department is a separate agency responsible for maintaining its own records, so requests should be submitted to the department that maintains the records you want." The website also expresses a preference for email communications.

9. To date, Defendant has failed to respond to Plaintiff's request in any way or even acknowledge receipt of the request.

COUNT ONE
(Violation of FOIA)

10. Plaintiff reaffirms paragraphs 1-9 as though fully restated herein.

11. Defendant was required to take action in one of three ways within five days business days of receipt of Plaintiff's request: (1) comply with the request; (2) deny the request; or (3) extend the time for responding. *See* 5 ILCS 140/3(d).

12. Because Defendant failed to comply with the request, deny the request, or extend the time for responding, request is considered denied and Defendant is in violation of FOIA. *Id.*

13. Plaintiff is being irreparably harmed by Defendant's denial of Plaintiff's request and violation of FOIA, as Plaintiff is being denied its legal right to inspect requested public records.

14. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff prays that the Court: (A) declare Defendant to be in violation of FOIA; (B) order Defendant to search for and produce any and all non-exempt, public records responsive to Plaintiff's FOIA request at no cost pursuant to 5 ILCS 140/3(d); (C) enjoin Defendant from withholding access to non-exempt public records responsive to Plaintiff's FOIA request; (D) award Plaintiff reasonable attorneys' fees and costs pursuant to 5 ILCS 140/11(i); and (E) order such other and further relief as the Court finds just and equitable.

Dated: January 13, 2026

Respectfully submitted,

/s/ Christine Svenson

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