

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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	Case No.: 2026CH000004
)	
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 (“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 Sangamon 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.”

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 or about September 5, 2025, Illinois Governor JB Pritzker was photographed with Kellen McMiller at a “Peacekeeper” anti-gun violence event in Chicago’s Englewood neighborhood. On or about September 18, 2025, McMiller was arrested on first degree murder charges arising from a “smash-and-grab” robbery at a Michigan Avenue Louis Vuitton store in Chicago that left one person dead. *See* “Man pictured at ‘Peacekeeper’ event with Pritzker charged in deadly smash-and-grab,” *NBC Chicago* (Sept. 18, 2025) (available at <https://www.nbcchicago.com/news/local/man-pictured-at-peacekeeper-event-with-pritzker-charged-in-deadly-smash-and-grab/3826277/>).

6. On September 22, 2025, Plaintiff submitted a FOIA request to Defendant seeking access to the following public records:

1. All photographs, images, or visual media depicting Governor JB Pritzker and Kellen McMiller (or any individual identified as a participant in the peacekeeper program wearing a “peacekeeper” vest) taken during the Governor’s visits to Chicago on or around September 5, 2025, including but not limited to the event in Englewood focused on community violence intervention.
2. The original and any edited versions of the press release or newsroom posting from September 3-5, 2025, titled or related to “Gov. Pritzker Meets with Community Violence Intervention Partners” or similar, including metadata showing edits, removals, or additions.
3. Communications (including emails, memos, text messages, notes, or logs) regarding the decision to include, remove, or edit the photo of Governor Pritzker and Kellen McMiller from any official state website, press release, or social

media. This includes communications involving the Governor, his staff, and communications team, or legal advisors.

4. Any background checks, vetting documents, participant lists, or selection criteria records related to Kellen McMiller's involvement in the peacekeeper program or the September 5, 2025, event, including any knowledge of his criminal history, warrants, or prior interactions with state officials.
5. All records of communications or interactions between Governor JB Pritzker (or his office) and Kellen McMiller, including invitations to events, follow-ups, or any other contacts before or after September 5, 2025.
6. Any reports, evaluations, or data on the peacekeeper program's participant vetting processes, including background or other checks.

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

7. By letter dated Defendant acknowledged receipt of the request on September 22, 2025 and informed Plaintiff that the request had been designated FOIA Request #2025-551. Defendant's letter also invoked a five-business day extension of time to respond to the request, until October 6, 2025.

8. On October 6, 2025, Plaintiff received an email from Defendant asserting that it required an additional extension – through and including October 14, 2025 – to finish processing the request.

9. To date, Defendant has failed to respond to Plaintiff's request in any substantive manner.

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 even the additional time Defendant asserted it required to respond—until and including October 14, 2025—has long since expired and Defendant has failed to comply with or deny Plaintiff's request, the 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
Christine Svenson
ARDC No 6230370
CHALMERS, ADAMS, BACKER
& KAUFMAN, LLC
345 N. Eric Drive
Palatine, IL 60067
Tel: 312.437.8629
Email: csvenson@chalmersadams.com

Counsel for Plaintiff