

6/3/2026 3:47 PM
By: AL

Susann W. McGee
CLERK OF THE CIRCUIT COURT
CHAMPAIGN COUNTY, ILLINOIS

**IN THE CIRCUIT COURT FOR THE SIXTH JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS**

JUDICIAL WATCH, INC.,)
)
Plaintiff,)
)
vs.)
)
CITY OF URBANA,)
)
Defendant.)
_____)

Case No.: 2026CH000049

COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF

NOW COMES Plaintiff Judicial Watch, Inc., by and through its attorneys, SVENSON LEGAL, 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 Champaign 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 City of Urbana (“Defendant” or “City”) 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 January 19, 2025, Julio Cucul-Bol killed Katie Abraham when he rear-ended, while travelling at 78-miles-per-hour, the car in which she was a passenger. Upon investigation, the Champaign County State’s attorney stated that Cucul-Bol went to three bars before the crash and was found with open cans of beer. At the time of the accident, Cucul-Bol was a Guatemalan citizen in the United States illegally. He fled the accident scene and was later arrested in Texas, traveling towards the Mexican border.

6. Cucul-Bol was charged and eventually pled guilty to four felonies: aggravated DUI involving death; leaving the scene of a fatal crash; aggravated DUI causing bodily harm; and leaving the scene of a personal injury crash. On December 22, 2025, Judge Adam Bill sentenced Cucul-Bol to 30 years in the Illinois Department of Corrections.

7. On May 7, 2025, the U.S. Department of Justice announced, “A grand jury returned an indictment on May 6, 2025, charging Julio Cucul-Bol, 29, a Guatemalan national, with possessing a false permanent resident card, possessing a false Social Security card, false use of a passport, and making a false statement on a bank application.” The trial has been set for September 2026.

8. On May 18, 2026, Judicial Watch submitted a FOIA request to the Urbana Police Department (“Department”), a component of Defendant, seeking access to all records relating to Case # U25-00984 and/or Julio Cucul-Bol. The request also notified the Department that the state prosecution against Mr. Cucul-Bol is closed and that Illinois FOIA exemptions concerning

law enforcement records generally only apply to ongoing law enforcement proceedings being conducted by the recipient of a FOIA request.

9. On May 26, 2026, the Department responded to Plaintiff's FOIA request, which the Department designated as FOIA request number FOIA-2026-F-0688. In its response, the agency produced the Illinois Traffic Crash Report for Case # U25-00984 but withheld all other records concerning that case or Mr. Cucul-Bol. Specifically, the department stated it was withholding "all police reports and supplementary documentation pertaining to Case # U25-00984" and "all video records pertaining to Case #U25-00984." The Department also stated it was purportedly withholding the records pursuant to 5 ILCS 140/7(1)(d)(i), 5 ILCS 140/7(1)(d)(vii), 5 U.S.C. § 552(b)(7)(A), 5 ILCS 140/7(1)(d)(iii), and/or 5 U.S.C. § 552 (b)(7)(B).

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

10. Plaintiff reaffirms paragraphs 1-9 as though fully restated herein.
11. Defendant failed to produce all non-exempt records responsive to Plaintiff's FOIA request.
12. 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.
13. 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 produce any and all non-exempt, public records responsive to Plaintiff's FOIA request; (C) enjoin Defendant from withholding access to non-exempt public records responsive to Plaintiff's FOIA; (D) 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; (E) award Plaintiff reasonable attorneys' fees and costs; and (F) order such other and further relief as the Court finds just and equitable.

Dated: June 3, 2026

Respectfully submitted,

/s/ Christine Svenson
Christine Svenson
ARDC No. 6230370
SVENSON LEGAL, LLC
707 W. Colfax Street
Palatine, IL 60067
Tel: 312.437.8629
Email: christine@svensonlegal.com

Counsel for Plaintiff