Hearing Date: 11/30/2026 9:30 AM
Location: Court Room 2301
Judge: Mackoff, Myron

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

JUDICIAL WATCH, INC.,	)	
	)	
Plaintiff,	)	Case No.: 2026CH09322
	)	
vs.	)	In Chancery
	)	Injunction/Temporary Restraining Order
TOWNSHIP OF LYONS,	)	
	)	
Defendant.	)	
	)	

COMPLAINT IN CHANCERY 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 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 Township of Lyons ("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 August 31, 2026, Plaintiff submitted a FOIA request to Defendant seeking access to the following public records:

1. Any and all records showing the date/time stamp of any downloads/accessing of the video discussed in this WGN article https://wgntv.com/news/wgn-investigates/kiss-caught-on-camera-causes-uproar-in-suburban-races/, in which Bridgeview Mayor Steve Landek kissed Lyons Township Clerk Elyse Hoffenberg.

2. Any and all records of communications sent to and from Lyons Township personnel, including but not limited to emails (along with associated attachments), text messages, encrypted app messages, and Slack messages, regarding downloading/accessing the video discussed in the article in Bullet 1, including communications between Supervisor Chris Getty and township personnel and any communications between Supervisor Getty and her opponent, Liz Gorman or Gorman campaign personnel.

3. Any FOIA requests for the video.

4. The complete unedited video, which appears in the WGN article, but with an additional minute on either side of the current time frame of the published video.

6. Defendant's website asserts that "submitting a FOIA request is an easy process; start by checking if the information you want is publicly available. If not, simply send an email to ehoffenberg@lyonsts.com and reasonably describe the records you seek. We'll send a confirmation email that your request was received within one business day; the records will be provided within 3-5 business days depending on the request."

7. The request was submitted by email, to the email address for submitting FOIA requests listed on Defendant's website: ehoffenberg@lyonsts.com

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8. 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.

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.

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Dated: September 28, 2026

Respectfully submitted,

/s/ Christine Svenson

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