



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

December 23, 2025

PUBLIC ACCESS OPINION 25-015
(Request for Review 2025 PAC 89024)

FREEDOM OF INFORMATION ACT:
Basis for Withholding Police Officer
Witness Questionnaires

Mr. Max Blaisdell
Invisible Institute
5534 South Dorchester Avenue, Unit 1
Chicago, Illinois 60637

Ms. Charita Callaway
FOIA Officer
Cook County State's Attorney's Office
50 West Washington Street
Chicago, Illinois 60602

Dear Mr. Blaisdell and Ms. Callaway:

This binding opinion is issued by the Attorney General pursuant to section 9.5(f) of the Freedom of Information Act (FOIA) (5 ILCS 140/9.5(f) (West 2024)). For the reasons discussed below, this office concludes that Cook County State's Attorney's Office (State's Attorney's Office) improperly redacted questionnaires responsive to Mr. Max Blaisdell's August 11, 2025, FOIA request.

On that date, Mr. Blaisdell, on behalf of the Invisible Institute, submitted a FOIA request to the State's Attorney's Office via its online FOIA portal seeking copies of "records sufficient to show: - all law enforcement officers or other law enforcement experts who have been identified as potentially requiring disclosure via the Brady/Giglio Form (meaning a yes answer was written in response on one of the included questions) from July 8, 2025 through the date this request is processed."¹ On August 14, 2025, the State's Attorney's Office responded to

¹FOIA portal message from Max Blaisdell to Cook County State's Attorney's Office (August 11, 2025).

500 South 2nd Street Springfield, Illinois 62701 (217) 782-1090 • Fax: (217) 782-7046	115 South LaSalle Street Chicago, Illinois 60603 (312) 814-3000 • Fax: (312) 814-3806	1745 Innovation Drive, Suite C Carbondale, Illinois 62903 (618) 529-6400 • Fax: (618) 529-6416
---	---	--

Individuals with hearing or speech disabilities can reach us by using the 7-1-1 relay service.

www.IllinoisAttorneyGeneral.gov

Mr. Max Blaisdell
Ms. Charita Callaway
December 23, 2025
Page 2

Mr. Blaisdell by providing him with copies of four police officer witness questionnaires but redacting the following information from each: (i) the police officer's name (in the "Witness Name" field); (ii) the police officer's answer to the question of whether they had ever been arrested, charged with, or convicted of a criminal offense; and (iii) the section for "Additional Information" (except for the one questionnaire in which this section is blank).² The State's Attorney's Office cited sections 2.15(b) and 7(1)(c) of FOIA as its bases for the redactions,³ and also claimed that the requested records are not public records or otherwise available, providing an outdated citation to a provision of the Department of State Police Law.⁴

On September 4, 2025, Mr. Blaisdell submitted the above-referenced Request for Review contesting the State's Attorney's Office's redactions to the four police officer witness questionnaires.⁵ He asserted:

The records at issue are Brady/Giglio disclosure questionnaires completed by law enforcement officers and experts for use in criminal proceedings. These forms are not private "rap sheets" or general "criminal history reports," but rather sworn attestations by public officials about professional misconduct, credibility, and disciplinary history. Such information is created and maintained for the purpose of informing courts, defense counsel, and prosecutors, and thus falls squarely within the scope of public business.^[6]

Mr. Blaisdell additionally asserted: "These records concern the professional honesty and integrity of law enforcement officers who testify in court—a matter of profound public interest and accountability."⁷

²Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Max Blaisdell, Invisible Institute/Hyde Park Herald/South Side Weekly (August 14, 2025).

³5 ILCS 140/2.15(b) (West 2024); 5 ILCS 140/7(1)(c) (West 2024).

⁴See 20 ILCS 2605/55a(5)(c) (2000) (providing that the Department of State Police has a duty to "procure and file criminal history records as is necessary and helpful to plan programs of crime prevention, law enforcement and criminal justice"). Public Act 91-239, effective January 1, 2000, renumbered section 55a(5) as section 2605-300 of the Department of State Police Law (20 ILCS 2605/2605-300). Public Act 102-538, effective August 20, 2021, then repealed section 2605-300 and added the subject language to section 2605-200(a)(9) of the Illinois State Police Law (20 ILCS 2605/2605-200(a)(9) (West 2024)), where it presently is located.

⁵E-mail from Max Blaisdell to Public Access Counselor (September 4, 2025).

⁶E-mail from Max Blaisdell to Public Access Counselor (September 4, 2025).

⁷E-mail from Max Blaisdell to Public Access Counselor (September 4, 2025).

Mr. Max Blaisdell
Ms. Charita Callaway
December 23, 2025
Page 3

On September 17, 2025, the Public Access Bureau e-mailed a copy of the Request for Review to the State's Attorney's Office,⁸ accompanied by a letter requesting unredacted copies of the questionnaires for this office's confidential review and a detailed written explanation of the legal and factual bases for the applicability of the section 7(1)(c) exemption.⁹ On September 22, 2025, the State's Attorney's Office furnished unredacted copies of the questionnaires and its written answer to this office's letter.¹⁰ Also on that date, the State's Attorney's Office issued a revised response to Mr. Blaisdell in which it expanded on the reasons for its partial denial.¹¹ In particular, the State's Attorney's Office asserted the redactions were also proper pursuant to sections 7(1)(f) and 7(1)(m) of FOIA.¹² On September 23, 2025, this office forwarded a copy of the State's Attorney Office's answer to Mr. Blaisdell and notified him of his opportunity to reply in writing.¹³ On September 29, 2025, Mr. Blaisdell replied by maintaining his objections to the redactions.¹⁴

On November 7, 2025, the Public Access Bureau extended the time within which to issue a binding opinion by 30 business days, to December 24, 2025, pursuant to section 9.5(f) of FOIA.¹⁵

On December 5, 2025, an Assistant Attorney General (AAG) in the Public Access contacted the State's Attorney's Office to clarify its citations of section 2.15(b) of FOIA and section 55a(5)(c) of the Department of State Police Law.¹⁶ In a December 8, 2025, telephone

⁸E-mail from Matthew G. Goodman, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General, to [Charita] Callaway (September 17, 2025).

⁹Letter from Matt Goodman, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Charita Callaway, FOIA Officer, Cook County State's Attorney's Office (September 17, 2025), at 2.

¹⁰Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Matt Goodman, Assistant Attorney General, Public Access Bureau, Office of the Attorney General (September 22, 2025).

¹¹Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Max Blaisdell, Invisible Institute/Hyde Park Herald/South Side Weekly (September 22, 2025).

¹²5 ILCS 140/7(1)(f), (1)(m) (West 2024).

¹³Letter from Matt Goodman, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Max Blaisdell, Journalist, Invisible Institute (September 23, 2025).

¹⁴E-mail from Max Blaisdell to [Matt] Goodman, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (September 29, 2025).

¹⁵Letter from Matt Goodman, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Max Blaisdell, Journalist, Invisible Institute, and Charita Callaway, FOIA Officer, Cook County State's Attorney's Office (November 7, 2025).

¹⁶E-mail from Matthew G. Goodman, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General, to [Charita] Callaway (December 5, 2025).

conversation with that AAG, the FOIA Officer of the State's Attorney's Office acknowledged that an incorrect citation to the Department of State Police Law had been provided and that an amended response would be issued.¹⁷ On December 11, 2025, the State's Attorney's Office emailed¹⁸ this office amended answers dated December 9, 2025, to both Mr. Blaisdell's Request for Review and his FOIA request; the amended answers did not cite section 2.15(b) of FOIA and section 55a(5)(c) of the Department of State Police Law as bases for denying the request,¹⁹ maintaining the applicability of only sections 7(1)(c), 7(1)(f), and 7(1)(m).²⁰

ANALYSIS

In section 1 of FOIA (5 ILCS 140/1 (West 2024)), "it is declared to be the public policy of the State of Illinois that all persons are entitled to full and complete information regarding the affairs of government and the official acts and policies of those who represent them as public officials and public employees consistent with the terms of this Act." Under FOIA, "[a]ll records in the custody or possession of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt." 5 ILCS 140/1.2 (West 2024).

Section 7(1)(c) of FOIA

Section 7(1)(c) of FOIA exempts from disclosure "[p]ersonal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, unless the disclosure is consented to in writing by the individual subjects of the information." Section 7(1)(c) defines "unwarranted invasion of personal privacy" as "the disclosure of information that is highly personal or objectionable to a reasonable person and in which the subject's right to privacy outweighs any legitimate public interest in obtaining the information." The exemption expressly provides, however, that "[t]he disclosure of

¹⁷Telephone call from Charita Callaway to Matt Goodman (December 8, 2025).

¹⁸E-mail from Charita Callaway, FOIA Supervisor, FOIA Unit, Cook County State's Attorney's Office, to AAG Matthew Goodman (December 11, 2025).

¹⁹Even if the State's Attorney's Office had re-asserted those provisions, section 2605-200(a)(9) of the Illinois State Police Law merely requires the Illinois State Police to procure "information that is necessary and helpful" for certain planning purposes, while section 2.15(b) of FOIA provides that "(i) court records that are public; (ii) records that are otherwise available under State or local law; and (iii) records in which the requesting party is the individual identified, except as provided under Section 7(1)(d)(vi)[.]" are documents "pertaining to criminal history record information" which are "subject to inspection and copying by the public[.]" These provisions do not render the requested questionnaires exempt from disclosure under FOIA.

²⁰Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Matthew Goodman, Assistant Attorney General, Public Access Bureau (December 9, 2025); Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Max Blaisdell, Invisible Institute/Hyde Park Herald/South Side Weekly (December 9, 2025).

information that **bears on the public duties of public employees and officials shall not be considered an invasion of personal privacy.**" (Emphasis added.)

The State's Attorney's Office's amended answer to this office contended, in relevant part:

The names of individuals writing complaints are exempt from disclosure because this information is highly personal and there is no public interest in the name of the individual. Release of the names may cause those individuals to be targeted for harassment or threats if other individuals are unhappy that complaints were made. Moreover, if these names are disclosed, future citizens may be reluctant to express their concerns for fear that their names will be made public. Also, because the contents of the complaints are provided, the entities and public are made aware of the complaints alleged.^[21]

The State's Attorney's Office's argument for the applicability of section 7(1)(c) does not align with the contents of the records at issue or the disputed redactions. Mr. Blaisdell did not seek, and the State's Attorney's Office did not redact, the names of private citizens who wrote complaints. The records at issue are questionnaires consisting of answers by police officers to questions concerning their credibility as witnesses in criminal proceedings. The completed questionnaires contain information about whether the police officers had been arrested, charged with or convicted of a criminal offense, as well as whether they had been disciplined, investigated, or subject to a complaint. The State's Attorney's Office did not address why the officers' names or the information bearing on their suitability as witnesses would fall within the scope of section 7(1)(c). Because the definition of "unwarranted invasion of personal privacy" in section 7(1)(c) expressly excludes information that bears on the public duties of public employees, it is unnecessary for this office to balance the police officers' right to privacy against the public interest in disclosure of their names and the other redacted material. *See Gekas v. Williamson*, 393 Ill. App. 3d 573, 586 (2009) (concluding that unfounded complaints alleging that a police officer "committed misconduct in his capacity as a deputy sheriff are 'information that bears on [his] public duties,' and the disclosure of such information 'shall not be considered an invasion of personal privacy.'"). Accordingly, this office concludes that the State's Attorney's Office improperly redacted the questionnaires pursuant to section 7(1)(c) of FOIA.

Section 7(1)(f) of FOIA

Section 7(1)(f) of FOIA exempts from disclosure "[p]reliminary drafts, notes, recommendations, memoranda and other records in which opinions are expressed, or policies or actions are formulated, except that a specific record or relevant portion of a record shall not be exempt when the record is publicly cited and identified by the head of the public body." The

²¹Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Matthew Goodman, Assistant Attorney General, Public Access Bureau (December 9, 2025), at [2].

section 7(1)(f) exemption applies to "inter- and intra-agency predecisional and deliberative material." *Harwood v. McDonough*, 344 Ill. App. 3d 242, 247 (2003). Section 7(1)(f) is "intended to protect the communications process and encourage frank and open discussion among agency employees before a final decision is made." *Harwood*, 344 Ill. App. 3d at 248. The Illinois Appellate Court has stated that "purely factual material" is not exempt from disclosure under section 7(1)(f) unless the factual material is "'inextricably intertwined'" with predecisional discussions. *Watkins v. McCarthy*, 2012 IL App (1st) 100632, ¶ 36 (quoting *Enviro Tech International, Inc., v. United States Environmental Protection Agency*, 371 F.3d 370, 374-75 (7th Cir. 2004)).

The State's Attorney's Office asserted that it properly redacted the questionnaires pursuant to section 7(1)(f) without providing any analysis or further explanation.²² On that basis alone, the State's Attorney's Office failed to satisfy its burden of demonstrating that the information it redacted from the questionnaires is exempt from disclosure under section 7(1)(f). Nonetheless, this office confidentially reviewed the questionnaires and confirmed that the redacted material is purely factual in nature. Noting that purely factual information is not exempt from disclosure pursuant to this exemption, the court in *State Journal-Register v. University of Illinois Springfield*, 2013 IL App (4th) 120881, ¶ 27, advised that "[f]actual information includes that which is collected within investigative reports, such as affidavits of witnesses and investigator's interviews[.]" In that case, the court concluded that witness statements did not fall within the scope of section 7(1)(f), "despite [the public body's] reliance on the documents prior to making its decision[.]" because they "contain factual accountings of the events by witnesses, [and] are capable of standing alone, with no evidence they are 'inextricably intertwined' with the predecisional process." *State Journal-Register*, 2013 IL App (4th) 120881, ¶ 30.

Because the redacted portions of the questionnaires are purely factual and because the State's Attorney's Office's did not demonstrate that disclosure would expose a predecisional deliberative process, this office concludes that the State's Attorney's Office did not sustain its burden of demonstrating by clear and convincing evidence that the redacted portions are exempt from disclosure pursuant to section 7(1)(f) of FOIA.

Section 7(1)(m) of FOIA

Section 7(1)(m) of FOIA exempts from disclosure:

Communications between a public body and an attorney or auditor representing the public body that would not be subject to discovery in litigation, and materials prepared or compiled by or for a public body in anticipation of a criminal, civil or administrative proceeding upon the request of an attorney advising

²²Letter from Charita Callaway, FOIA Officer, Office of the State's Attorney, Cook County, Illinois, to Matthew Goodman, Assistant Attorney General, Public Access Bureau (December 9, 2025), at [2].

the public body, and materials prepared or compiled with respect to internal audits of public bodies.

Communications protected by the attorney-client privilege are within the scope of section 7(1)(m). *People ex rel. Ulrich v. Stukel*, 294 Ill. App. 3d 193, 201 (1997). A party asserting that a communication to an attorney is protected by the attorney-client privilege "must show that (1) a statement originated in confidence that it would not be disclosed; (2) it was made to an attorney acting in his legal capacity **for the purpose of securing legal advice or services**; and (3) it remained confidential." (Emphasis added.) *Cangelosi v. Capasso*, 366 Ill. App. 3d 225, 228 (2006). Documents protected by the attorney-client privilege must contain confidential communications in which legal advice is requested or provided. See *Chicago Trust Co. v. Cook County Hospital*, 298 Ill. App. 3d 396, 408-09 (1998) (finding the attorney-client privilege inapplicable because the documents at issue did not show that the client was seeking legal advice). A public body that withholds records as attorney-client privileged under section 7(1)(m) "can meet its burden only by providing some *objective* indicia that the exemption is applicable under the circumstances." (Emphasis in original.) *Illinois Education Ass'n v. Illinois State Board of Education*, 204 Ill. 2d 456, 470 (2003).

Additionally, the work-product doctrine set out in Illinois Supreme Court Rule 201(b)(2) provides that "[m]aterial prepared by or for a party in preparation for trial is subject to discovery only if it does not contain or disclose the theories, mental impressions, or litigation plans of the party's attorney." A public body asserting that records are privileged attorney work-product must demonstrate that the records "'reveal the shaping process by which the attorney has arranged the available evidence for use in trial as dictated by his training and experience[.]' [Citation.]" *Monier v. Chamberlain*, 35 Ill. 2d 351, 359 (1966). However, "[a]ny relevant material generated in preparation for trial which does not disclose 'conceptual data' is freely discoverable under Rule 201(b)(2)." *Holland v. Schwan's Home Services, Inc.*, 2013 IL App (5th) 110560, ¶ 205 (quoting *Waste Management, Inc. v. International Surplus Lines Ins. Co.*, 144 Ill. 2d 178, 196 (1991)); see also *Monier*, 35 Ill. 2d at 360 (characterizing as "conceptual data" the "memoranda made by counsel of his impression of a prospective witness, as distinguished from verbatim statements of such witness, trial briefs, documents revealing a particular marshalling of the evidentiary facts for presentment at the trial, and similar documents which reveal the attorney's 'mental processes' in shaping his theory of his client's cause[.]").

The State's Attorney's Office explained its redaction of the questionnaires under section 7(1)(m) as follows:

Attorneys' notes, recommendations, and work product created over the course of investigative deliberations have also been redacted in their entirety as attorney-client privileged work product consistent with Section 7(1)(m) of the FOIA.

* * *

The materials that the requester sought contain privileged and confidential information that reveal the mental impressions and preliminary opinions of ASAs working on this case and are protected from disclosure by the work product doctrine. This includes handwritten notes, preliminary memoranda, research, and internal analyses generated over the course of the SAO's prosecution of this case. This analysis is confidential attorney work product and has been redacted pursuant to Section 7(1)(m).^[23]

The State's Attorney's Office's assertions that the responsive records are attorney-client privileged communications and/or attorney work-product are conclusory and misplaced. The State's Attorney's Office has not provided any factual basis or supporting legal authority for the propositions that the questionnaires are either: (1) communications with an attorney acting as a legal advisor and relating to legal advice; or (2) materials created in preparation for trial that would reveal the theories, mental impressions, or litigation plans of attorneys in the State's Attorney's Office. Although, as the questionnaires reflect, a police officer may be called as a witness in a criminal prosecution, or communicate with the State's Attorney's Office about potential criminal charges or testimony, the State's Attorney's Office does not represent the police officers or their police departments or provide them with confidential legal advice in connection with those proceedings. Accordingly, the questionnaires are not protected by the attorney-client privilege.

Similar to its explanation under section 7(1)(c), the State's Attorney's Office's mischaracterizes the contents of the records when asserting that the questionnaires are attorney work-product within the scope of section 7(1)(m) of FOIA. The State's Attorney's Office redacted factual information provided by police officers, not conceptual items such as preliminary memoranda prepared by attorneys, attorney opinions about the officers' credibility or value as a witness, or any other internal analysis of the officers who provided the information in the questionnaires. The redacted information does not contain or reflect any attorney's theories, mental impressions, or litigation plans. Therefore, this office concludes that the State's Attorney's Office did not sustain its burden of proving by clear and convincing evidence that the redacted information is exempt from disclosure pursuant to section 7(1)(m) of FOIA.

FINDINGS AND CONCLUSIONS

After full examination and giving due consideration to the information submitted, the Public Access Counselor's review, and the applicable law, the Attorney General finds that:

1) On August 11, 2025, Mr. Max Blaisdell, on behalf of the Invisible Institute, submitted a FOIA request to the Cook County State's Attorney's Office seeking copies of witness questionnaires containing answers by police officers.

²³Letter from Charita Callaway, FOIA Officer, Cook County State's Attorney's Office, to Matthew Goodman, Assistant Attorney General, Public Access Bureau (December 9, 2025).

2) On August 14, 2025, the State's Attorney's Office provided Mr. Blaisdell with copies of four police officer witness questionnaires with redactions pursuant to sections 2.15(b) and 7(1)(c) of FOIA. The State's Attorney's Office also claimed that the requested records are not public records or otherwise available, citing a former provision of the Department of State Police Law (20 ILCS 2605/55a(5)(c)).

3) On September 8, 2025, Mr. Blaisdell submitted the above-referenced Request for Review contesting the State's Attorney's Office's redaction of the four questionnaires.

4) On September 17, 2025, the Public Access Bureau sent a copy of the Request for Review to the State's Attorney's Office and asked it to provide unredacted copies of the contested questionnaires for this office's confidential review. This office also asked the State's Attorney's Office to provide a detailed explanation of the factual and legal bases for redacting those records.

5) On September 22, 2025, the State's Attorney's Office furnished the requested materials to this office.

6) On September 23, 2025, the Public Access Bureau forwarded a copy of the State's Attorney's Office's written answer to Mr. Blaisdell and notified him of his right to reply.

7) On September 29, 2025, Mr. Blaisdell replied.

8) On November 7, 2025, the Public Access Bureau extended the time within which to issue a binding opinion by 30 business days pursuant to section 9.5(f) of FOIA. Accordingly, the Attorney General may properly issue a binding opinion with respect to this matter.

9) On December 11, 2025, the State's Attorney's Office issued an amended answer to Mr. Blaisdell and to this office, asserting that the redacted information is exempt only pursuant to sections 7(1)(c), 7(1)(f), and 7(1)(m) of FOIA.

10) The records at issue in this Request for Review consist of four police officer witness questionnaires with the following information redacted: (i) the police officer's name; (ii) the police officer's answer to the question pertaining to whether they had ever been arrested, charged with, or convicted of a criminal offense; and (iii) a section for "Additional Information."

11) Section 7(1)(c) exempts from disclosure "[p]ersonal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." Section 7(1)(c) expressly provides that "[t]he disclosure of information that bears on the public duties of public employees and officials shall not be considered an invasion of personal privacy."

12) Disclosure of the redacted information would not constitute a clearly unwarranted invasion of personal privacy because the information directly bears on the police officers' public duties. Accordingly, this office concludes that the State's Attorney's Office has not met its burden of proving that the redacted information is exempt from disclosure under section 7(1)(c) of FOIA.

13) Section 7(1)(f) of FOIA exempts from inspection and copying, in relevant part, "[p]reliminary drafts, notes, recommendations, memoranda and other records in which opinions are expressed, or policies or actions are formulated[.]" Purely factual information is not within the scope of this exemption unless it is inextricably intertwined with predecisional deliberative material.

14) The redacted portions of the questionnaires are purely factual in nature, and the State's Attorney's Office did not demonstrate that disclosure would expose the substance of predecisional deliberations. Accordingly, this office concludes that the State's Attorney's Office has not met its burden of proving that the redacted information is exempt from disclosure under section 7(1)(f) of FOIA.

15) Section 7(1)(m) of FOIA exempts from disclosure "[c]ommunications between a public body and an attorney or auditor representing the public body that would not be subject to discovery in litigation, and materials prepared or compiled by or for a public body in anticipation of a criminal, civil, or administrative proceeding upon the request of an attorney advising the public body, and materials prepared or compiled with respect to internal audits of public bodies." In addition to the attorney-client privilege, the section 7(1)(m) exemption encompasses the work-product doctrine, which protects the theories, mental impressions, or litigation plans of a party's attorney.

16) The questionnaires at issue do not contain or reference any legal advice sought by police officers or given by the State's Attorney's Office, or reveal the theories, mental impressions, or litigation plans of the State's Attorney's Office. Accordingly, this office concludes that the State's Attorney's Office has not met its burden of proving that the redacted information is exempt from disclosure under section 7(1)(m) of FOIA.

Therefore, it is the opinion of the Attorney General that the Cook County State's Attorney's Office improperly redacted the questionnaires responsive to Max Blaisdell's August 11, 2025, Freedom of Information Act request. Accordingly, the State's Attorney's Office is hereby directed to take immediate and appropriate action to comply with this opinion by providing Mr. Blaisdell with unredacted copies of the questionnaires.

This opinion shall be considered a final decision of an administrative agency for the purposes of administrative review under the Administrative Review Law. 735 ILCS 5/3-101 *et seq.* (West 2024). An aggrieved party may obtain judicial review of the decision by filing a complaint for administrative review with the Circuit Court of Cook or Sangamon County within

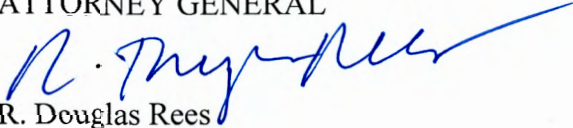
Mr. Max Blaisdell
Ms. Charita Callaway
December 23, 2025
Page 11

35 days of the date of this decision naming the Attorney General of Illinois and Mr. Max Blaisdell as defendants. *See* 5 ILCS 140/11.5 (West 2024).

Very truly yours,

KWAME RAOUL
ATTORNEY GENERAL

By:


R. Douglas Rees
Chief Deputy Attorney General


CERTIFICATE OF SERVICE

Joshua M. Jones, Bureau Chief, Public Access Bureau, Chicago, hereby certifies that he has served a copy of the foregoing Binding Opinion (Public Access Opinion 25-015) upon:

Mr. Max Blaisdell
Invisible Institute
5534 South Dorchester Avenue, Unit 1
Chicago, Illinois 60637
Max.Blaisdell@gmail.com

Ms. Charita Callaway
FOIA Officer
Cook County State's Attorney's Office
50 West Washington Street
Chicago, Illinois 60602
SAO.FOIA@CookCountySAO.org

by causing a true copy thereof to be sent electronically to the addresses as listed above and by causing to be mailed a true copy thereof in correctly addressed, prepaid envelopes to be deposited in the United States mail at Chicago, Illinois on December 23, 2025.



Joshua M. Jones
Bureau Chief

Joshua M. Jones
Bureau Chief
Public Access Bureau, Chicago
Office of the Attorney General
115 South LaSalle Street
Chicago, Illinois 60603
(312) 814-8413