

**IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS**

KIRK ALLEN, JOHN KRAFT, AND EDGAR	)
COUNTY WATCHDOGS INC.	)
	)
PLAINTIFF.	)
V.	)
	)
ALGONQUIN TOWNSHIP AND ALGONQUIN	)
TOWNSHIP ROAD DISTRICT.	)
	)
DEFENDANTS.	)

**COMPLAINT**

NOW COMES Plaintiffs, Kirk Allen, John Kraft, and Edgar County Watchdogs Inc., by their undersigned attorneys, Denise Ambroziak, and bring this suit to Overturn Defendant's refusal, and willful violation of the Illinois Freedom of Information Act, to respond to Plaintiff's Freedom of Information Act requests. In support of this Complaint, Plaintiffs state as follows:

**INTRODUCTION**

1. Pursuant to fundamental philosophy of the American constitutional form of government it is 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 the Illinois Freedom of Information Act ("FOIA"). 5 ILCS 140/1.
2. Restraints on access to information to the extent permitted by FOIA. are limited exceptions to the principle that the people of this state have a right to full disclosure of information relating to the decisions, policies, procedures, rules. standards and other aspects of governmental activity that affect the conduct of government and the lives of people. 5 ILCS 140/1.

3. All public records 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 140/3.
4. Under FOIA Section II (h). "except as to causes the court considers to be of greater importance, proceedings arising under FOIA shall take precedence on the docket over all other causes and be assigned for hearing and trial at the earliest practicable date and expedited in every way."

### **PARTIES**

5. Plaintiffs Allen, Kraft, and ECWI are the FOIA requesters in this case.
6. Defendants Algonquin Township and Algonquin Township Road District are public bodies located in McHenry County.
7. The records sought as set forth in each count are non-exempt public records of ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT.
8. ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT willfully and intentionally violated FOIA by Defendant's ongoing and constant refusal to, and failure to properly respond to the FOIA requests shown in each count below and the Exhibits attached hereto and included herein.
9. The aforementioned paragraphs 1-8 are incorporated in each of Counts I-XVI as if fully restated therein in each count.

**COUNT I**  
**F.O.I.A. Request #1**

10. On November 10, 2017, Plaintiff Kraft, using the e-mail address [john@Illinoisleaks.com](mailto:john@Illinoisleaks.com), requested information concerning the public body by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit A.
  
11. On November 17, 2017, Defendant, Algonquin Township, responded by indicating that the requested public records were prohibited from disclosure by a protective order of the 22<sup>nd</sup> Judicial Circuit Court, and that disclosure would constitute an unwarranted invasion of privacy. See Exhibit B.
  
12. On November 17, 2017, Plaintiff Kraft responded and asked for a copy of the alleged Protective Order. See Exhibit C.
  
13. On November 26, 2017, Defendant's attorney responded by providing a copy of a Protective Order dated June 8, 2017. See Exhibit D.
  
14. On November 26, 2017, Plaintiff Kraft responded again for further information related to the alleged Protective Order. See Exhibit E.
  
15. On November 26, 2017, Defendant's attorney again responded, this time include two separate Orders, dated June 8, 2017 or November 7, 2017. See Exhibit F.
  
16. Upon review of the alleged protective orders, it is not clear that the requested records are prohibited from disclosure under the protective orders of June 8, 2017 or November 7, 2017.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS

INC. Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

B. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

C. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

D. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

E. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

F. Award Plaintiff reasonable attorneys' fees and costs;

G. Award such other relief the Court considers just and equitable.

**COUNT II**  
**F.O.I.A. Request #2**

17. On November 10, 2017, Plaintiff, Kraft, using the e-mail address [john@Illinoisleaks.com](mailto:john@Illinoisleaks.com), requested information, along with a clarification of the request, concerning the public body by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit G.

18. On November 22, 2017, Defendant responded by indicating that no responsive records were found. See Exhibit H.
19. On November 22, 2017, Plaintiff Kraft responded asking Defendant if she asked the person who purchased them and indicated that the credit card company should have the receipt, and asked Plaintiff to ask the credit card company for a copy. See Exhibit I.
20. On November 22, 2017, Defendant responded stating that it was not required to obtain a copy from the credit card company and failed to state whether or not it asked the person who purchased the item(s) if that person had the receipt. See Exhibit J.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties;
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT III**  
**F.O.I.A. Request #3**

21. On November 13, 2018, Kirk Allen, using the e-mail address Kirk@Illinoisleaks.com. Requested information concerning the public body as shown in Exhibit K by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit K.

22. Karen Lukasik responded January 6<sup>th</sup>, 2018, beyond the 5 day time frame indicating the request was unduly burdensome. See Exhibit L. Such an exemption is improper as the public body failed to comply with 5 ILCS 140/3(d),(g).

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT IV**  
**F.O.I.A. Request #4**

23. On November 13, 2018, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com). Requested information concerning the public body as shown in Exhibit M by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit M.
24. Karen Lukasik responded November 22, 2017, beyond the permitted time frame with a response that misrepresented the request made by Kirk Allen. See Exhibit N
25. On November 23, 2017, Kirk Allen responded to the misrepresentations made by Lukasik in the response to the request. See Exhibit N.
26. Karen Lukasik responded November 25<sup>th</sup>, 2017 with claimed misunderstandings to the original request. See Exhibit N.
27. At the time of this filing, items numbered 1 and 2 of the FOIA request have not been provided.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

E. Award Plaintiff reasonable attorneys' fees and costs;

F. Award such other relief the Court considers just and equitable.

**COUNT V**  
**F.O.I.A. Request #5**

28. On November 13, 2017. Kirk Allen, using the e-mail address Kirk@Illinoisleaks.com.

Requested information concerning the public body as shown in Exhibit O by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit O.

29. On December January 3<sup>rd</sup>, 2018, Karen Lukasik sent an email acknowledging outstanding FOIA requests. See Exhibit P

30. On January 3<sup>rd</sup>, 2018, Kirk Allen once again provided the same FOIA request (Exhibit O) as no response to that request had been made. See Exhibit Q

31. On January 6<sup>th</sup>, 2018, Karen Lukasik responded indicating there were no records and did so outside the established five day statutory deadline. See Exhibit R

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

E. Award Plaintiff reasonable attorneys' fees and costs;

F. Award such other relief the Court considers just and equitable.

**COUNT VI**  
**F.O.I.A. Request #6**

32. On November 13<sup>th</sup>, 2017, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requested information concerning the public body as shown in Exhibit S by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit S.

33. After no response from the public body, Kirk Allen sent the same request (Exhibit S) to [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com) on January 3<sup>rd</sup>, 2018. See Exhibit T

34. On January 6<sup>th</sup>, 2018, Karen Lukasik responded claiming the request was not received until January 3<sup>rd</sup>, 2018 and that it was unduly burdensome. Such an exemption is improper as the public body failed to comply with 5 ILCS 140/3(d),(g). See Exhibit U .

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT VII**  
**F.O.I.A. Request #7**

35. On November 27<sup>th</sup>, 2017, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com), requested information concerning the public body as shown in Exhibit V by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit V.

36. Mary Ann Selvey, a legal assistant, responded to the request on January 12, 2018. See Exhibit W.

37. Attached to Exhibit W is a letter in which the Attorney for the Public Body is responding on behalf of the public body. (See Exhibit X). The law does not permit a contracted attorney for the public body to be the FOIA officer for the public body. FOIA officers are to be designated by the public body and must be an official or employee. The attorney is neither an official or employee of the public body. (Sec. 3.5) The attorney cited exemptions for denial even though portions of the request are subject to FOIA.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

- A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign

this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT VIII**  
**F.O.I.A. Request #8**

38. On November 13, 2017 Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com), requested information concerning the public body as shown in Exhibit Y by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit Y.

39. After no response and claims the FOIA request was not received, Kirk Allen, using the email address [Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com) forwarded his original request (Exhibit Y), on January 3<sup>rd</sup>, 2018 to Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit Z.

40. On January 6<sup>th</sup>, 2018, Karen Lukasick responded in an email denying the request as unduly burdensome. Such an exemption is improper as the public body failed to comply with 5 ILCS 140/3(d),(g) See Exhibit AA.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC. Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

B. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

C. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

D. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

E. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

F. Award Plaintiff reasonable attorneys' fees and costs;

G. Award such other relief the Court considers just and equitable.

**COUNT IX**  
**F.O.I.A. Request #9**

41. On November 29, 2017 Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com), requested information concerning the public body as shown in Exhibit AB by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AB.

42. Karen Lukasik responded on December 6<sup>th</sup>, 2017 indicating there were not documents responsive to the request. See Exhibit AC. Such a statement is inconsistent with video evidence substantiating Karen Lukasik did in fact remove records from at least one office. The video contravening the assertions of Karen Lukasik is available at:

[https://www.youtube.com/watch?time\\_continue=2&v=Qoaa5C1hPKk](https://www.youtube.com/watch?time_continue=2&v=Qoaa5C1hPKk)

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT  
to pay civil penalties:

E. Award Plaintiff reasonable attorneys' fees and costs;

F. Award such other relief the Court considers just and equitable.

**COUNT X**  
**F.O.I.A. Request #10**

43. On December 6, 2017, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com), requested information concerning the public body as shown in Exhibit AD by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AD.

44. On December 13<sup>th</sup>, 2017, Natalie Pesin, an attorney who is not the FOIA officer for the Township or Township Road District, sent an email extending the time for compliance and stated the records would be provided December 20, 2017. See Exhibit AE

45. On January 3<sup>rd</sup>, 2018, well after the deadline for receipt of records established by a lawyer for the Township, Kirk Allen sent an email to the attorney requesting information on the Township's intentions for numerous overdue FOIA requests. See Exhibit AF.

46. On January 11<sup>th</sup>, 2018, well past due the date for compliance under FOIA, Karen Lukasik responded providing records for one part of the request, denying existence of records in the second part. See Exhibit AG

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS  
INC. Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's

docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT XI**  
**F.O.I.A. Request #11**

47. On December 17, 2017, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requesting information concerning the public body as shown in Exhibit AH by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AH.

48. Karen Lukasik responded on January 4<sup>th</sup>, well past the legal time frame for responding to a FOIA request and stated there were no responsive documents for the Township Supervisor and Township Clerk but makes no reference to the Highway Commissioner possessing the requested records. See Exhibit AI. Such a statement is inconsistent with video evidence substantiating the

existence of such records. The video contravening the assertions of Karen Lukasik is available at: [https://www.youtube.com/watch?time\\_continue=2&v=Qoaa5C1hPKk](https://www.youtube.com/watch?time_continue=2&v=Qoaa5C1hPKk)

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

E. Award Plaintiff reasonable attorneys' fees and costs;

F. Award such other relief the Court considers just and equitable.

**COUNT XI**  
**F.O.I.A. Request #12**

49. On December 18, 2017, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requested information concerning the public body as shown in Exhibit AJ by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AJ.

50. On January 3, 2018, Kirk Allen, once again had to resend his request as the public body made claims they never received it. See Exhibit AK

51. On January 11, 2018, Karen Lukasik responded with a partial production that included a link to requested emails. See Exhibit AL

52. On January 17, 2018, as established in the Freedom of Information Act, Kirk Allen resubmitted his request because of the inability to reasonably access the records at the link provided. See Exhibit AM.

53. On January 22, 2018 Karen Lukasik responded with instructions how to open the files and that if that did not work she would copy them to a disk and mail them. See Exhibit AN.

54. On January 22, 2018, Kirk Allen requested Karen Lukasik to mail the requested information. This request was based on the fact that the records were not reasonably accessible at the link provided. See Exhibit AO

55. To date, the public body has yet to provide the requested records to Kirk Allen.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this

case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT XIII**  
**F.O.I.A. Request #13**

56. On January 19<sup>th</sup>, 2018, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requested information concerning the public body as shown in Exhibit AP by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AP.

57. To date the public body has not responded to Kirk Allen's FOIA request found in Exhibit AP.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

- A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign

this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT XIV**  
**F.O.I.A. Request #14**

58. On January 19<sup>th</sup>, 2018, Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requested information concerning the public body as shown in Exhibit AQ by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AQ.

59. To date the public body has not responded to Kirk Allen's FOIA request found in Exhibit AQ.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

- A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's

docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT XV**  
**F.O.I.A. Request #15**

60. On January 3<sup>rd</sup>, 2018 Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) requested information concerning the public body as shown in Exhibit AR by e-mailing Karen Lukasik at [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com). See Exhibit AR.

61. To date the public body has not responded to Kirk Allen's FOIA request found in Exhibit AR.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC. Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

- A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:
- B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;
- C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:
- D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:
- E. Award Plaintiff reasonable attorneys' fees and costs;
- F. Award such other relief the Court considers just and equitable.

**COUNT XVI**  
**F.O.I.A. Request #16**

62. On January 17<sup>th</sup>, 2018 Kirk Allen, using the e-mail address [Kirk@Illinoisleaks.com](mailto:Kirk@Illinoisleaks.com) re-submitted his FOIA request found in Exhibit AJ due to the responsive records not being reasonably accessible. That re-submitted request was done in accordance with the obligations under the Freedom of Information Act. See Exhibit AS

63. To date the public body has not responded to Kirk Allen's FOIA request found in Exhibit AR.

WHEREFORE, KIRK ALLEN, JOHN KRAFT, AND EDGAR COUNTY WATCHDOGS INC.

Prays that this honorable court grant the following relief:

A. In accordance with FOIA Section 11(1), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way:

A. Declare THAT ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT have violated FOIA:

B. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to produce the requested records;

C. Enjoin ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT from withholding non-exempt public records under FOIA:

D. Order ALGONQUIN TOWNSHIP AND ALGONQUIN TOWNSHIP ROAD DISTRICT to pay civil penalties:

E. Award Plaintiff reasonable attorneys' fees and costs;

F. Award such other relief the Court considers just and equitable.

RESPECTFULLY SUBMITTED.

/s/ Denise Ambroziak

Denise Ambroziak  
Attorney for Plaintiffs

# EXHIBIT A

**From:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
**Sent:** Friday, November 10, 2017 9:09:52 AM  
**To:** Ryan Provenzano; Karen Lukasik; Charles Lutzow  
**Cc:** Kirk Allen  
**Subject:** FOIA Request (Algonquin Township) - 11-10-2017

In accordance with the Freedom of Information Act I am requesting the following.

If you are not the FOIA officer, you are required to immediately forward this request to the appropriate FOIA officer as required by statute [5 ILCS 140/3(c)].

I am requesting the following information under the Freedom of Information Act:

- Copy of all camera footage for the Nest camera which is the subject of the Northwest Herald article entitled "*Turmoil in Algonquin Township: Clerk says hidden security camera was installed to spy on her*": <http://www.nwherald.com/lists/2017/11/04/b353bd2437cf465d9006eab89abf1c96/index.xml?page=1>

**Electronic copies are requested.**

**This is not a commercial request.**

*I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), and the principal purpose of the request is to access and disseminate information concerning news and current or passing events, or for articles of opinion or features of interest to the public.; Section 2 (f) ("News media") as an Investigative Reporter for Disclosure News Magazine, an online and printed newspaper, and an Investigative Reporter for the Edgar County Watchdogs, an online news site, and am engaged in making news reels and other motion picture for public viewing, and as a news service to provide news and data to news organization(s) and nonprofits; Section 2 (g) ("Recurrent requester"); and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes); Section 3.2 (Recurrent requesters); Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).*

*This is also a request for fee waiver, should any fees be imposed, as this information bears on the public business of the Algonquin Township and will be used to inform citizens of the actions of their public officials and employees, of their rights and responsibilities, of news and current or passing events, and for articles of opinion or features of interest to the public.*

Thanks,  
John Kraft  
7060 Illinois Highway 1  
Paris, Illinois 61944  
[john@illinoisleaks.com](mailto:john@illinoisleaks.com)  
[217-808-2527](tel:217-808-2527)

# EXHIBIT B

---

**From:** Karen Lukasik [<mailto:klukasik@algonquintownship.com>]  
**Sent:** Friday, November 17, 2017 7:48 AM  
**To:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>; Ryan Provenzano <[ryan@algonquintownship.com](mailto:ryan@algonquintownship.com)>; Charles Lutzow <[clutzow@algonquintownship.com](mailto:clutzow@algonquintownship.com)>  
**Cc:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>  
**Subject:** Re: FOIA Request (Algonquin Township) - 11-10-2017

Mr. Kraft

In response to you FOIA, pursuant to the Illinois Freedom of Information Act 140 ILCS 140/7 (1) (a) the information you are seeking is specifically prohibited from disclosure by a protective order of the 22nd Judicial Circuit Court. Further, pursuant to Illinois Freedom of Information Act 140 ILCS 140/7 (1) (c) the information sought is exempt from disclosure as it would constitute an unwarranted invasion of privacy.

Regards  
Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

---

**From:** Karen Lukasik [<mailto:klukasik@algonquintownship.com>]  
**Sent:** Friday, November 17, 2017 7:48 AM  
**To:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>; Ryan Provenzano <[ryan@algonquintownship.com](mailto:ryan@algonquintownship.com)>; Charles Lutzow <[clutzow@algonquintownship.com](mailto:clutzow@algonquintownship.com)>  
**Cc:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>  
**Subject:** Re: FOIA Request (Algonquin Township) - 11-10-2017

Mr. Kraft

In response to you FOIA, pursuant to the Illinois Freedom of Information Act 140 ILCS 140/7 (1) (a) the information you are seeking is specifically prohibited from disclosure by a protective order of the 22nd Judicial Circuit Court. Further, pursuant to Illinois Freedom of Information Act 140 ILCS 140/7 (1) (c) the information sought is exempt from disclosure as it would constitute an unwarranted invasion of privacy.

Regards  
Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

# EXHIBIT C

**From:** John Kraft

**Sent:** Friday, November 17, 2017 8:41 AM

**To:** 'Karen Lukasik' <[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)>; Ryan Provenzano  
<[ryan@algonquintownship.com](mailto:ryan@algonquintownship.com)>; Charles Lutzow <[clutzow@algonquintownship.com](mailto:clutzow@algonquintownship.com)>

**Cc:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>

**Subject:** RE: FOIA Request (Algonquin Township) - 11-10-2017

Please send me a copy of the protective order so I can verify its disclosure is prohibited.

Thanks,  
John Kraft

# EXHIBIT D

-----Original Message-----

From: James P. Kelly [<mailto:jpkelly@mkm-law.com>]  
Sent: Sunday, November 26, 2017 2:04 PM  
To: John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
Cc: [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
Subject: FW: FOIA Request (Algonquin Township) - 11-10-2017

See attached.

James P. Kelly  
Matuszewich & Kelly LLP  
Crystal Lake, Illinois  
Chicago, Illinois

Telephone (815) 459-3120  
Facsimile (815) 459-3123

CONFIDENTIALITY NOTICE: This communication, including any attachments, may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure that is intended exclusively for the individual to whom it is addressed. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by return email and delete all copies of this message. This message is protected by applicable legal privileges and is confidential.

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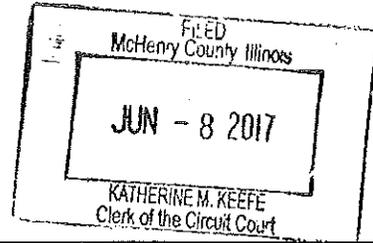
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT

STATE OF ILLINOIS )  
) SS  
COUNTY OF MCHENRY )

GEN. NO. 17 CH 435  
 Jury  Non-Jury

Andrew Gasser  
VS  
Karen Lukasik  
VS  
Charles Lutzow

VS.



Date: 6-8-17 Plaintiff's Attorney: HANLON

Defendant's Attorney: SOOCH ZR FMC

ORDER

This Cause coming onto be heard upon Defendant/Counter Plaintiff, Karen Lukasik, notice having been given and a Verified Complaint having been filed and the Court hearing arguments and being advised in the premises:  
IT IS ORDERED that Attorney Joe Gottmoller is appointed by the Court as Receiver to engage the services of a qualified individual or individuals to secure a copy of the videos at Algonquin township as well as copies of any and all hard-drives from all photocopies and scanners at Algonquin township and Mr. Gottmoller shall provide copies of same to all Counsel of Record and shall notice up same to the Court and a protective order is entered that no distribution of the information will be made outside of this litigation unless given leave of Court.

Prepared by: EUMMERSON

Attorney for: Karen Lukasik

Attorney Registration No.: 312613.5

the attorney and parties to

Judge: [Signature]

# EXHIBIT E

-----Original Message-----

From: John Kraft

Sent: Sunday, November 26, 2017 2:12 PM

To: 'James P. Kelly' <[jpkelly@mkm-law.com](mailto:jpkelly@mkm-law.com)>

Cc: [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

Subject: RE: FOIA Request (Algonquin Township) - 11-10-2017

Wasn't that order explained during the last hearing that it did not apply to FOIA requests?  
If not, please advise and I will file a Motion for Leave to obtain those records under FOIA.

Thanks,  
John Kraft  
217-808-2527

# EXHIBIT F

-----Original Message-----

From: James P. Kelly [<mailto:jpkelly@mkm-law.com>]  
Sent: Sunday, November 26, 2017 4:06 PM  
To: John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
Cc: [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
Subject: RE: FOIA Request (Algonquin Township) - 11-10-2017

Mr. Kraft,

I do not know the context of your comments, however, it is my understanding that the Clerk asserted two (2) exemptions with respect to the document you are requesting. Both of these exemptions are applicable.

The court entered a protective order on 6/8/17. The court then entered a protective order relative to the document you are requesting on 11/07/17 referring back to the protective order of 6/8/17.

The Clerk's previous response to your FOIA is inserted below:

From: Karen Lukasik  
Sent: Friday, November 17, 2017 7:48:15 AM  
To: John Kraft; Ryan Provenzano; Charles Lutzow  
Cc: Kirk Allen  
Subject: Re: FOIA Request (Algonquin Township) - 11-10-2017

Mr. Kraft

In response to you FOIA, pursuant to the Illinois Freedom of Information Act 140 ILCS 140/7 (1) (a) the information you are seeking is specifically prohibited from disclosure by a protective order of the 22nd Judicial Circuit Court. Further, pursuant to Illinois Freedom of Information Act 140 ILCS 140/7 (1) (c) the information sought is exempt from disclosure as it would constitute an unwarranted invasion of privacy.

Regards  
Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

James P. Kelly  
Matuszewich & Kelly LLP  
Crystal Lake, Illinois  
Chicago, Illinois

Telephone (815) 459-3120  
Facsimile (815) 459-3123

CONFIDENTIALITY NOTICE: This communication, including any attachments, may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure that is intended

exclusively for the individual to whom it is addressed. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by return email and delete all copies of this message. This message is protected by applicable legal privileges and is confidential.

-----Original Message-----

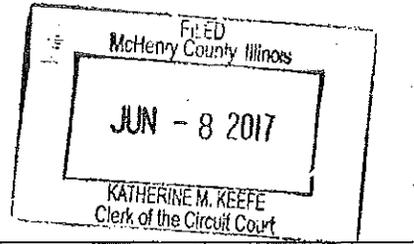
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF MCHENRY )

GEN. NO. 17 CH 435  
 Jury  Non-Jury

Andrew Gasser  
vs  
Karen Lukasik  
vs  
Charles Lutzow

vs.



Date: 6-8-17 Plaintiff's Attorney HANLON

Defendant's Attorney SOOCH ZR F&MC

ORDER

This Cause coming onto be heard upon Defendant/Counter Plaintiff, Karen Lukasik, motion having been given and a Verified Complaint having been filed and the Court hearing arguments and being advised in the premises: **IT IS ORDERED** that Attorney Joe Gottmoller is appointed by the Court as Receiver to engage the services of a qualified individual or individuals to secure a copy of the videos at Algonquin township as well as copies of any and all hard-drives from all photocopies and scanners at Algonquin township and Mr. Gottmoller shall provide copies of same to all Counsel of Record and shall notice up same to the Court and a protective order is entered that no distribution of the information will be made outside of this litigation, unless given leave of Court.

Prepared by: GUMMERSALL

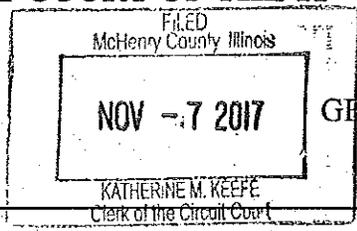
Attorney for: Karen Lukasik

Attorney Registration No.: 312613.5

the attorney and parties to  
Judge: Michael J. Gammell

IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF MCHENRY )



GEN. NO. 17 CH 435  
 Jury  Non-Jury

Andrew Gravis

VS.

Karen Lukasik

Date: 11/7/17 Plaintiff's Attorney

Defendant's Attorney J. Kelly

D. McNeill

ORDER

This cause coming before the Court on Lutnow's Motion for Protective Order and argument has heard.

It is hereby ordered that:

- 1) The password ~~to the camera~~ and username shall be provided to the attorney for the parties and the Township clerk personally in order for Lukasik to have full access to the video and audio recordings of the subject camera.
- 2) The protective order previously issued by this court shall apply to video produced by this camera.

Prepared by: James P. Kelly

Attorney for: Lutnow

Attorney Registration No.: \_\_\_\_\_

Judge: Michael Caldwell

# EXHIBIT G

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**From:** John Kraft  
**Sent:** Friday, November 10, 2017 9:41 AM  
**To:** 'supervisor@algonquintownship.com' <supervisor@algonquintownship.com>;  
'klukasik@algonquintownship.com' <klukasik@algonquintownship.com>;  
'clutzow@algonquintownship.com' <clutzow@algonquintownship.com>  
**Cc:** Kirk Allen (kirk@illinoisleaks.com) <kirk@illinoisleaks.com>  
**Subject:** RE: FOIA Request (Algonquin Township) - 11-10-2017 #2

Please amend the first item of this request – the camera was purchased in either January of February of 2016 – I original said February because that was the credit card statement the purchase is found on.

**From:** John Kraft  
**Sent:** Friday, November 10, 2017 9:40 AM  
**To:** 'supervisor@algonquintownship.com' <supervisor@algonquintownship.com>;  
'klukasik@algonquintownship.com' <klukasik@algonquintownship.com>;  
'clutzow@algonquintownship.com' <clutzow@algonquintownship.com>  
**Cc:** Kirk Allen (kirk@illinoisleaks.com) <kirk@illinoisleaks.com>  
**Subject:** FOIA Request (Algonquin Township) - 11-10-2017 #2

In accordance with the Freedom of Information Act I am requesting the following.

If you are not the FOIA officer, you are required to immediately forward this request to the appropriate FOIA officer as required by statute [5 ILCS 140/3(c)].

I am requesting the following information under the Freedom of Information Act:

- Copy of all camera footage from the "Blink" cameras purchased by the Road Commissioner in February of 2016
- Copy of the receipt of the purchase of "Blink" camera(s)
- Copy of the receipt for "Hooters" - the purchase was either in January or February of 2016.

**Electronic copies are requested.**

**This is not a commercial request.**

*I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), and the principal purpose of the request is to access and disseminate information concerning news and current or passing events, or for articles*

*of opinion or features of interest to the public.; Section 2 (f) ("News media") as an Investigative Reporter for Disclosure News Magazine, an online and printed newspaper, and an Investigative Reporter for the Edgar County Watchdogs, an online news site, and am engaged in making news reels and other motion picture for public viewing, and as a news service to provide news and data to news organization(s) and nonprofits; Section 2 (g) ("Recurrent requester"); and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes); Section 3.2 (Recurrent requesters); Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).*

*This is also a request for fee waiver, should any fees be imposed, as this information bears on the public business of the Algonquin Township and will be used to inform citizens of the actions of their public officials and employees, of their rights and responsibilities, of news and current or passing events, and for articles of opinion or features of interest to the public.*

Thanks,  
John Kraft  
7060 Illinois Highway 1  
Paris, Illinois 61944  
[john@illinoisleaks.com](mailto:john@illinoisleaks.com)  
[217-808-2527](tel:217-808-2527)

# EXHIBIT H

**From:** Karen Lukasik [<mailto:klukasik@algonquintownship.com>]  
**Sent:** Wednesday, November 22, 2017 4:13 PM  
**To:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
**Cc:** [jpkelly@mkm-law.com](mailto:jpkelly@mkm-law.com); Calhoun, Valerie <[VCalhoun@atg.state.il.us](mailto:VCalhoun@atg.state.il.us)>; Charles Lutzow <[clutzow@algonquintownship.com](mailto:clutzow@algonquintownship.com)>  
**Subject:** FOIA Dated 11/10/2017

Mr. Kraft,

In response to your FOIA requests:

"Copy of all footage from the "Blink" camera(s)" - There is no footage of any surveillance that I found or am aware of.

"Copy of receipt of the purchase of "Blink" camera(s)" - I found no supporting document of a receipt for Blink camera(s) during that date.

"Copy of the receipt for "Hooters" - the purchase was either in January or February of 2016" - I have searched both of those billing dates and found no document supporting a receipt for Hooters.

Regards,



Karen Lukasik

Algonquin Township Clerk

(847) 639-2700

[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

# EXHIBIT I

**From:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
**Sent:** Wednesday, November 22, 2017 8:21:23 PM  
**To:** Karen Lukasik  
**Cc:** [jpkelly@mkm-law.com](mailto:jpkelly@mkm-law.com); Calhoun, Valerie; Charles Lutzow  
**Subject:** Re: FOIA Dated 11/10/2017

Did you ask the person who's credit card purchased them? He should know where the cameras are and where the footage is. The credit card company should have the receipt, please ask them for it.

Thanks,  
John Kraft

Get [Outlook for Android](#)

---

# EXHIBIT J

**From:** Karen Lukasik [<mailto:klukasik@algonquintownship.com>]  
**Sent:** Wednesday, November 22, 2017 9:39 PM  
**To:** John Kraft <[john@illinoisleaks.com](mailto:john@illinoisleaks.com)>  
**Cc:** [jpkelly@mkm-law.com](mailto:jpkelly@mkm-law.com); Calhoun, Valerie <[vcalhoun@atg.state.il.us](mailto:vcalhoun@atg.state.il.us)>; Charles Lutzow <[clutzow@algonquintownship.com](mailto:clutzow@algonquintownship.com)>  
**Subject:** Re: FOIA Dated 11/10/2017

Mr. Kraft,

After a diligent review of the records, I did not find the information you've requested.

Under FOIA, the Township is not required to make inquiries on your behalf with the credit card holder or contact the credit card company on a third party request. FOIA requires us to share records we have. I did not find the records you've requested in the date range of your FOIA.

I have copied Jim Kelly, the Township attorney, on this response. Please contact him directly with any additional clarification to FOIA requirements.

Happy Thanksgiving,

Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

---

# EXHIBIT K

**From:** [Kirk Allen](#)  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Bcc:** [John Kraft](#)  
**Subject:** FOIA Request  
**Date:** Monday, November 13, 2017 10:35:00 AM

---

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. Copy of all credit card, purchase card, and debit card statements since January 1, 2011 for all cards used by any elected official of the Algonquin Township. This would include ALL pages of those statements
2. Copy of all credit card reward point redemptions since January 1, 2011. This would be for any credit card used by any elected official of the Algonquin Township.
3. A copy of the last two Salary Setting and/or Compensation Setting resolutions for all elected officials of Algonquin Township.
4. A copy of all Serious XM subscription records since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under

FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT L

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Saturday, January 6, 2018 1:07:27 PM  
**Attachments:** [Foia Response Letter Allen 1.pdf](#)  
[Resolution for Salaries Elected Officials.pdf](#)

---

Your response is attached.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

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**From:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>  
**Sent:** Wednesday, January 3, 2018 3:19:02 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

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**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:35 AM  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. Copy of all credit card, purchase card, and debit card statements since January 1, 2011 for all cards used by any elected official of the Algonquin Township. This would include ALL pages of those statements
2. Copy of all credit card reward point redemptions since January 1, 2011. This would be for any credit card used by any elected official of the Algonquin Township.
3. A copy of the last two Salary Setting and/or Compensation Setting resolutions for all elected officials of Algonquin Township.
4. A copy of all Serious XM subscription records since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10)

("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the

method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT M

**From:** [Kirk Allen](#)  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Bcc:** [John Kraft](#)  
**Subject:** FOIA Request  
**Date:** Monday, November 13, 2017 10:38:00 AM

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In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A complete copy of the Verizon phone records for account 786471402-00001 since January 1, 2016. The February-March of 2016 billing reflects the total for that billing cycle was \$945.68
2. A copy of the Open Meetings Act Training Certificates for all Algonquin Township elected officials.
3. A copy of the board meeting minutes and agenda for the meeting held in Springfield at the Chesapeake Seafood Restaurant on 8/8/2008

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

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required by law to forward it to the appropriate FOIA officer.

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I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT N

## Kirk Allen

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**From:** Karen Lukasik <klukasik@algonquintownship.com>  
**Sent:** Saturday, November 25, 2017 5:55 AM  
**To:** Kirk Allen  
**Cc:** David W. McArdle; jpkelly@mkm-law.com  
**Subject:** Re: FOIA Request

Hello Mr. Allen

I apologize for not emailing sooner I had family in for the holidays. I realize that's not an excuse but wanted you to understand why I did not email sooner

I am certainly not playing games at all. I misunderstood your request on the FOIA originally. I thought you only wanted certain dates as you asked for several dates so I became confused. I am going in to the township today to search further for what you have asked for.

I have been presented with much turmoil from day one. I did not destroy any records nor did I intend to. I know that is a felony. I am an honest and open person but you seem to be targeting me and I'm not sure why. I've done nothing wrong other than get behind on FOIA requests. I have no staff and I had an inventory of where all records were shortly after I took office. The records have been moved and tampered with from day one and I did not even have access to them. I will do my best to find all that you are looking for. I welcome you to visit me at the Township so that I may show you what I am up against. I work full time in the private sector and unfortunately have no staff. I plan on appointing a deputy clerk and hiring someone ASAP to be able to get caught up.

All I wanted to do was serve as I had previously as a Trustee. I do not understand how the attention is all on a past elected official when there is serious mismanagement going on currently with tax payer monies. That was my only point I was trying to convey. If there was wrong doing by the past elected official or officials I had nothing to do with it. Please look at all that is occurring in the Township. There's much to see, unfortunately I have become the target and the ones handling our monies are robbing us dry. I have been inundated with FOIA requests and it appears the public already has the documents they are requesting. I'm not sure why there has to be so much duplication. It makes for an inefficient and ineffective government. I was trying my best to get all the records in order but political games have made that difficult. I will once again try to find and fulfill your requests this weekend.

I hope you have had a wonderful holiday.

Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
klukasik@algonquintownship.com

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**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Thursday, November 23, 2017 9:57:28 AM  
**To:** Karen Lukasik  
**Subject:** RE: FOIA Request

Unlike other FOIA requesters you may have dealt with, I do not play games nor mess with AG complaints except for the truly questionable responses, of which yours are not. We simply file lawsuits.

This FOIA request, and others, are past due which means you have violated FOIA. I will provide one response to this communication so that there is no confusion.

1. I did not ask for you to locate a bill totaling an amount within a specific date. I requested a copy of Verizon phone records for account 786471402-00001 since January 1, 2016.
2. All elected Algonquin Township Officials. There is no confusion as to what that means. Each elected position in the Algonquin Township makes those people Elected Officials. Past elected people are no longer Officials of the Township, thus they are not elected officials of Algonquin Township.

Kirk Allen  
Director, Edgar County Watchdogs  
217-508-0564

**From:** Karen Lukasik [mailto:klukasik@algonquintownship.com]  
**Sent:** Wednesday, November 22, 2017 4:19 PM  
**To:** Kirk Allen <Kirk@illinoisleaks.com>  
**Cc:** jpkelly@mkm-law.com; Calhoun, Valerie <VCalhoun@atg.state.il.us>  
**Subject:** Re: FOIA Request

Mr. Allen

In response to your FOIA request:

1. I searched for a Verizon bill totaling that amount and was not able to locate it within those dates.
2. Please be more specific on which elected officials you would like training for. For example, present or all past and present.
3. There are no board meeting minutes for a meeting at Chesapeake Seafood Restaurant on 8/8/2008.

Regards,



Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

# EXHIBIT O

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Monday, November 13, 2017 10:38 AM  
**To:** Karen Lukasik  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A complete copy of the Verizon phone records for account 786471402-00001 since January 1, 2016. The February-March of 2016 billing reflects the total for that billing cycle was \$945.68
2. A copy of the Open Meetings Act Training Certificates for all Alonguin Township elected officials.
3. A copy of the board meeting minutes and agenda for the meeting held in Springfield at the Chesapeake Seafood Restaurant on 8/8/2008

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

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I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT P

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** FOIAs  
**Date:** Wednesday, January 3, 2018 3:11:11 PM  
**Attachments:** [Outlook-1497565392.png](#)

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Hello Mr. Allen

I realize there are many outstanding FOIA requests and I am working on finding those this week as I am in the office this entire week. Please understand how time consuming these tasks are as I do not have any employees and I am slowly obtaining what I can with the outstanding requests. There were several requests in which I did not receive however they may have gone into my junk folder as I will be viewing that after this email is sent. I did not receive any FOIAs regarding the gift cards I will try to find any information regarding those that I can. I also do not have any information regarding any sick time to Bob Miller. I have asked the Supervisor's office to supply the annual reports as those reports were housed in that office prior to my taking office from what I have been told. I am not the only FOIA officer and I have been forwarding your requests to others if I do not have the documents or do not know where they may have been moved to.

My apologies I will try to get the answers out to you soon. As I said there were many FOIA requests on your webpage that you posted that I have not answered that I did not in fact receive or view. Could you please forward those to me again so that I make sure they are received properly now?

Thank you for your assistance,

Karen Lukasik



Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

# EXHIBIT Q

**From:** Kirk Allen  
**To:** "klukasik@algonquintownship.com"  
**Bcc:** John Kraft  
**Subject:** FW: FOIA Request  
**Date:** Wednesday, January 3, 2018 3:18:00 PM

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**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:39 AM  
**To:** klukasik@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A record of who received the 3 phone gift cards purchased at Jewel/Osco on 08/02/16 with a Platinum American Express card in the name of Robert J Miller.
2. A record of who received the 2 phone gift cards purchased at Jewel/Osco on 06/02/16 with a Platinum American Express card in the name of Robert J Miller.
3. A record of who received the 5 gift cards of \$250 each purchased 5/16/08 from Barn Nursery & Landscape Center – Purchased with a VISA card account number 4246 3112 9554 8835

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings

individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

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I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT R

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Saturday, January 6, 2018 1:20:08 PM  
**Attachments:** [Folia Response Letter Allen 2.pdf](#)

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Your response is attached.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

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**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 3, 2018 3:18:34 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:39 AM  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

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1. A record of who received the 3 phone gift cards purchased at Jewel/Osco on 08/02/16 with a Platinum American Express card in the name of Robert J Miller.
2. A record of who received the 2 phone gift cards purchased at Jewel/Osco on 06/02/16 with a Platinum American Express card in the name of Robert J Miller.
3. A record of who received the 5 gift cards of \$250 each purchased 5/16/08 from Barn Nursery & Landscape Center – Purchased with a VISA card account number 4246 3112 9554 8835

I qualify as both media and non-profit under the definitions in Section 2 (c-10)

("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

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method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT S

## **Kirk Allen**

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**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 11:18 AM  
**To:** klukasik@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of any personal reimbursements made to the Township for credit card purchases since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

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Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT T

**From:** Kirk Allen  
**To:** "klukasik@algonquintownship.com"  
**Bcc:** John Kraft  
**Subject:** FW: FOIA Request  
**Date:** Wednesday, January 3, 2018 3:18:00 PM

---

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 11:18 AM  
**To:** klukasik@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of any personal reimbursements made to the Township for credit card purchases since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any

questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

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Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT U

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Saturday, January 6, 2018 1:32:20 PM  
**Attachments:** [Foia Response Letter Allen 3.pdf](#)

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Please see the attached response.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

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**From:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>  
**Sent:** Wednesday, January 3, 2018 3:18:18 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 11:18 AM  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of any personal reimbursements made to the Township for credit card purchases since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

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I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen

PO Box 593  
Kansas, IL 61933

# EXHIBIT V

## Kirk Allen

---

**From:** Kirk Allen  
**Sent:** Monday, November 27, 2017 11:17 AM  
**To:** Karen Lukasik  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all subpoena's received by the Township in the last 12 months.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public

interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT W

**From:** [Mary Ann Selvey](#)  
**To:** [Kirk Allen](#)  
**Subject:** FOIA Response  
**Date:** Friday, January 12, 2018 1:46:18 PM  
**Attachments:** [18.01.12.Allen Ltr.Jan 3 FOIA Request.pdf](#)

---

Mr. Allen

Attached please find January 3, 2018 FOIA response.

Thank you!

Mary Ann Selvey, *Legal Assistant*  
Matuszewich & Kelly, LLP  
101 N. Virginia St., Suite 150  
Crystal Lake, Illinois 60014  
(815) 459-3120 x17 Telephone  
(815) 459-3123 Facsimile

CONFIDENTIALITY NOTICE: This communication, including any attachments, may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure that is intended exclusively for the individual to whom it is addressed. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by return email and delete all copies of this message. This message is protected by applicable legal privileges and is confidential.

# EXHIBIT X

LAW OFFICES OF  
**MATUSZEWICH & KELLY, LLP**

101 N. Virginia St., Suite 150  
Crystal Lake, Illinois 60014  
(815) 459-3120 Telephone  
(815) 459-3123 Facsimile

January 12, 2018

VIA E-MAIL at [kirk@illinoisleaks.com](mailto:kirk@illinoisleaks.com)

Mr. Kirk Allen  
PO Box 593  
Kansas, IL 61933

**Re: FOIA Request, Dated January 3, 2018**

Dear Mr. Allen:

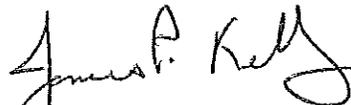
Thank you for writing to Algonquin Township with your request for information pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq. On January 3, 2018, you requested:

1. A copy of all subpoena's received by the Township in the last 12 months.

Your request is responded to as follows:

Enclosed are documents responsive to your request. Documents that are exempt from disclosure pursuant to 5 ILCS 140/7(1)(d)(vii) are not enclosed as they are part of an ongoing investigation.

Very truly,

  
James P. Kelly

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>nd</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

Andrew Gasser

vs.

Case Number 17 CH 435

Karen Lukasik, et al.

**SUBPOENA FOR PRODUCTION OF SPECIFIED DOCUMENTS,  
OBJECTS OR TANGIBLE THINGS**

TO: Ryan Provenzano, Algonquin Township

ADDRESS: 3702 U.S. Highway 14, Crystal Lake, Illinois 60014

You are directed to produce the following documents, objects or tangible things: See attached.

on the following time and date: October 2, 2017, by 10:00 a.m.

**YOUR FAILURE TO RESPOND TO THIS SUBPOENA OR TO COMPLY WITH COURT RULES MAY  
SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.**

**YOU MAY COMPLY WITH THIS SUBPOENA BY MAILING LEGIBLE AND COMPLETE COPIES  
OF ALL SPECIFIED DOCUMENTS, OBJECTS OR TANGIBLE THINGS REQUESTED IN THIS SUBPOENA  
TO THE PARTY OR LAW FIRM WHOSE ADDRESS APPEARS BELOW. COMPLIANCE BY MAIL  
REQUIRES A CERTIFICATION THAT THE DOCUMENTS, OBJECTS OR TANGIBLE THINGS MAILED ARE  
COMPLETE AND ACCURATE AND CONSTITUTE GOOD FAITH COMPLIANCE WITH THE MATERIALS  
REQUESTED BY SAID SUBPOENA. DO NOT FORWARD MATERIALS BEFORE DATE STATED ON  
SUBPOENA.**

Items to be delivered to the following party of law firm at the following address: David W. McArdle  
Zukowski, Rogers, Flood & McArdle, 50 Virginia Street, Crystal Lake, Illinois 60014



WITNESS September 11, 2017

*Katherine M. Keefe*

CLERK OF THE CIRCUIT COURT

Name Zukowski, Rogers, Flood & McArdle  
Attorney for Karen Lukasik  
Address 50 Virginia Street  
City, State Zip Crystal Lake, IL 60014  
Telephone 815/459-2050

**SERVICE ON PARTIES OF RECORD**

I served or will serve a copy of this Subpoena on all parties of record within 48 hours of its issuance.

*D. J. M. U.*

Attorney or Party Issuing Subpoena

**NOTICE:**

No Subpoena issued under this provision may be returnable less than fourteen (14) days following its date of service. Within said fourteen (14) days, any party may timely object to the Court to the utilization of the Subpoena.

The party causing the Subpoena to be issued shall be liable to the party subpoenaed for the reasonable costs of copying or reproduction. The court may enter such orders as may be necessary to enforce payment of copying costs. Any party may request copies of all materials obtained by this Subpoena. Expenses of copying shall be reproduced and forwarded to the requesting party not less than ten (10) business days following receipt of subpoenaed materials.

**CERTIFICATION BY SUBPOENAED PARTY OR AGENT**

I am the custodian of the records of the person or entity subpoenaed herein, and I certify that I have completely and accurately complied with the Subpoena and have provided all the specified documents, objects or tangible things requested which are in my constructive or actual possession or control.

DATE \_\_\_\_\_

\_\_\_\_\_  
Keeper of Records and Person Answering Subpoena

**SERVICE**

**PERSONAL SERVICE:**

I served this Subpoena by handing a copy to \_\_\_\_\_ on \_\_\_\_\_, 20\_\_\_\_. I paid the recipient \$ \_\_\_\_\_ for required fees and mileage expenses, if any.

\_\_\_\_\_  
Person Serving Subpoena

SUBSCRIBED and SWORN to  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

**SERVICE BY CERTIFIED OR REGISTERED MAIL:** I served this Subpoena by placing same with the U.S. Mail, restricted delivery, return receipt requested, prepaid, and addressed to the individual or organization listed on page one hereof, at the address listed on page one hereof, together with \$ 20.00 for fees and mileage expenses, if any. I mailed the above on September 11, 2017 at Crystal Lake. I received the return on such mailing indicating it was received on \_\_\_\_\_, 2017 by \_\_\_\_\_ at the address listed on page one.

*Cert-Mail # 7016 0910 0520 3946*

\_\_\_\_\_  
Person Mailing Subpoena and Receiving Return

SUBSCRIBED and SWORN to  
before me this \_\_\_\_\_ day  
of September, 2017.

\_\_\_\_\_  
Notary Public

IN THE CIRCUIT COURT OF 22<sup>ND</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

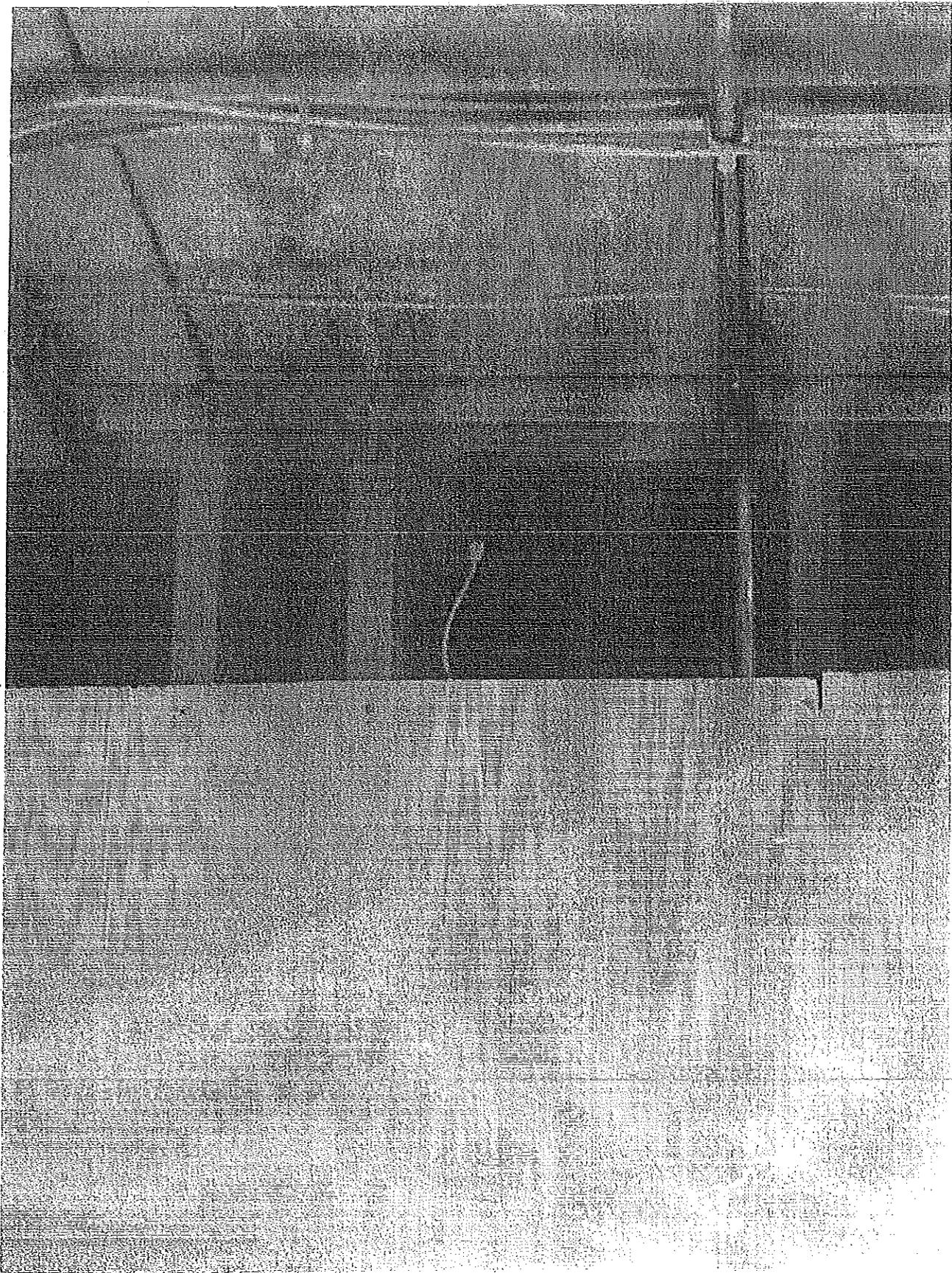
Andrew Gasser, )  
Plaintiff )  
v. )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants, )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants/Counter-Plaintiffs, )  
v. )  
Andrew Gasser, )  
Plaintiff/Counter-Defendant, )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk, )  
Defendant/Third Party Plaintiff )  
v. )  
Charles Lutzow, )  
Third Party Defendant )

Case No. 17 CH 435

Attachment to Subpoena to Ryan Provenzano

Any and all documents from June 1, 2017 through August 31, 2017, relating to:

1. The purchase of the nest cam serial number 18b 4305a 1157 Entry Key: K7M4RY installed in the records room in the basement of the Algonquin Township Hall, camera photo attached ("Subject Camera");
2. The password access codes to access the video and audio information from the Subject Camera;
3. Any documents relating to the use of the Subject Camera; and
4. Any documents relating to emails/letters or other communication relating to the Subject Camera.





STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

Andrew Gasser

vs.

Case Number 17 CH 435

Karen Lukasik, et al.

**SUBPOENA FOR PRODUCTION OF SPECIFIED DOCUMENTS,  
OBJECTS OR TANGIBLE THINGS**

TO: Keeper of the Records, Nest

ADDRESS: 3400 Hillview Avenue, Palo Alto, CA 94304

You are directed to produce the following documents, objects or tangible things: See attached.

on the following time and date: October 3, 2017, by 10:00 a.m.

**YOUR FAILURE TO RESPOND TO THIS SUBPOENA OR TO COMPLY WITH COURT RULES MAY  
SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.**

**YOU MAY COMPLY WITH THIS SUBPOENA BY MAILING LEGIBLE AND COMPLETE COPIES  
OF ALL SPECIFIED DOCUMENTS, OBJECTS OR TANGIBLE THINGS REQUESTED IN THIS SUBPOENA  
TO THE PARTY OR LAW FIRM WHOSE ADDRESS APPEARS BELOW. COMPLIANCE BY MAIL  
REQUIRES A CERTIFICATION THAT THE DOCUMENTS, OBJECTS OR TANGIBLE THINGS MAILED ARE  
COMPLETE AND ACCURATE AND CONSTITUTE GOOD FAITH COMPLIANCE WITH THE MATERIALS  
REQUESTED BY SAID SUBPOENA. DO NOT FORWARD MATERIALS BEFORE DATE STATED ON  
SUBPOENA.**

Items to be delivered to the following party of law firm at the following address: David W. McArdle  
Zukowski, Rogers, Flood & McArdle, 50 Virginia Street, Crystal Lake, IL 60014



WITNESS September 12 20 17

*Katherine M. Keefer*

CLERK OF THE CIRCUIT COURT

Name Zukowski, Rogers, Flood & McArdle  
Attorney for Karen Lukasik  
Address 50 Virginia Street  
City, State Zip Crystal Lake, IL 60014  
Telephone 815/459-2050



IN THE CIRCUIT COURT OF 22<sup>ND</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

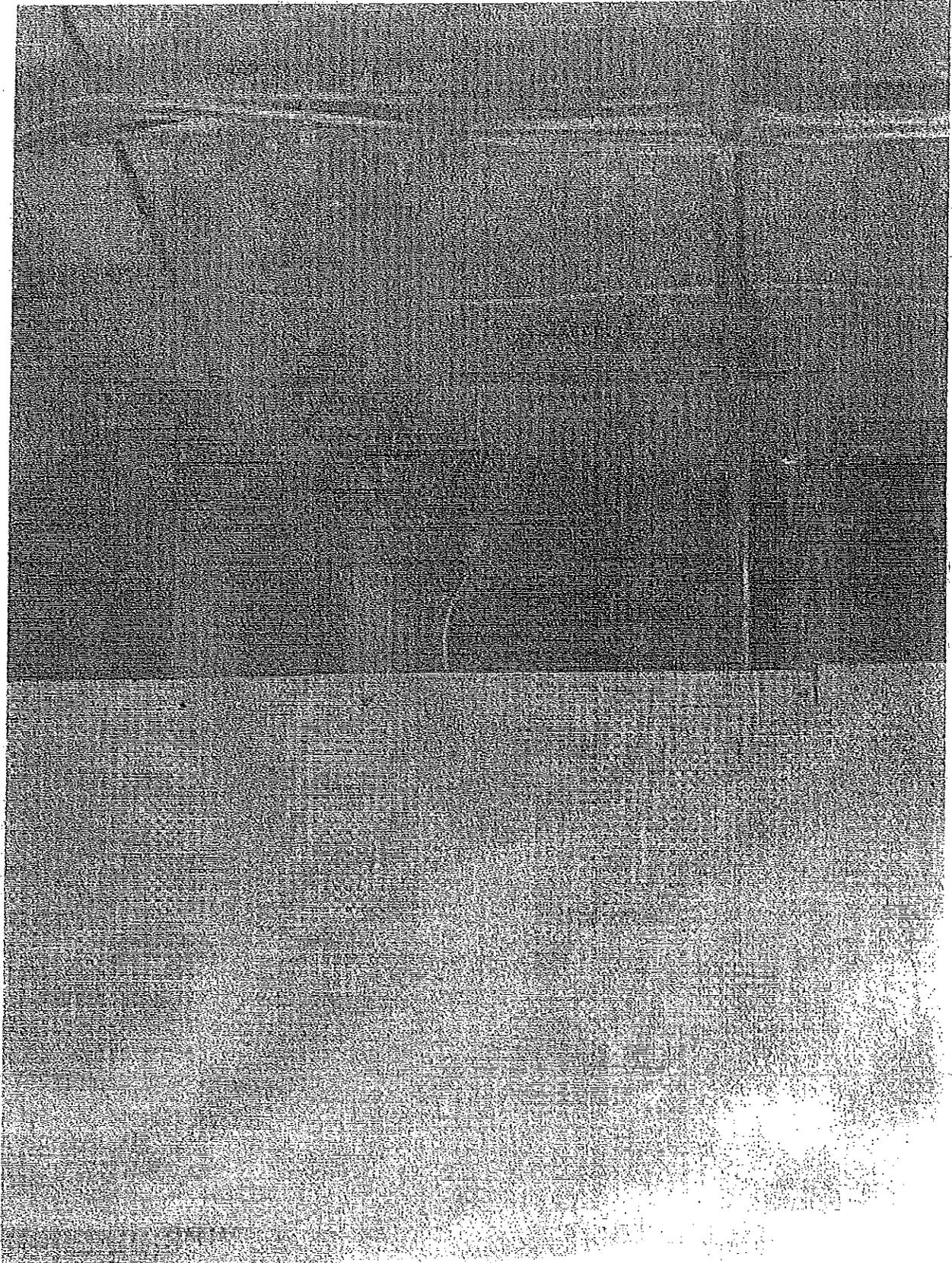
Andrew Gasser, )  
Plaintiff )  
v. )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants. )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants/Counter-Plaintiffs, )  
v. )  
Andrew Gasser, )  
Plaintiff/Counter-Defendant. )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk, )  
Defendant/Third Party Plaintiff. )  
v. )  
Charles Lutzow, )  
Third Party Defendant )

Case No. 17 CH 435

Attachment to Subpoena to Nest

Any and all documents from June 1, 2017 through August 31, 2017, relating to:

1. The purchase of the nest cam serial number 185-4305a 1157 Entry Key: K7M4RY installed in the records room in the basement of the Algonquin Township Hall, camera photo attached ("Subject Camera");
2. The password access codes to access the video and audio information from the Subject Camera;
3. Any documents relating to the use of the Subject Camera; and
4. Any documents relating to emails/letters or other communication relating to the Subject Camera.





IN THE CIRCUIT COURT OF 22<sup>ND</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

Andrew Gasser, )  
Plaintiff )  
v. )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants, )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk; )  
Anna May Miller; and Robert Miller )  
Defendants/Counter-Plaintiffs, )  
v. )  
Andrew Gasser, )  
Plaintiff/Counter-Defendant, )  
----- )  
Karen Lukasik, Individually and in her )  
Capacity as Algonquin Township Clerk, )  
Defendant/Third Party Plaintiff )  
v. )  
Charles Lutzow, )  
Third Party Defendant )

Case No. 17 CH 435

PROOF OF SERVICE

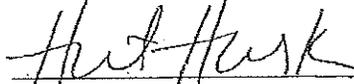
TO: Robert T. Hanlon  
Law Offices of Robert T.  
Hanlon & Associates, P.C.  
131 E. Calhoun Street  
Woodstock, IL 60098  
[rob@rhanlonlaw.com](mailto:rob@rhanlonlaw.com)  
[robert@robhanlonlaw.com](mailto:robert@robhanlonlaw.com)

James P. Kelly  
101 N. Virginia Street  
Crystal Lake, IL 60014  
[jpkelly@mkm-law.com](mailto:jpkelly@mkm-law.com)

Thomas W. Gooch, III  
The Gooch Firm  
209 S. Main Street  
Wauconda, IL 60084  
[office@goochfirm.com](mailto:office@goochfirm.com)

Steven J. Brody  
Steven J. Brody & Associates, Ltd.  
15 W. Woodstock Street  
Crystal Lake, IL 60014  
[steve@sjbrodylaw.com](mailto:steve@sjbrodylaw.com)  
[service@sjbrodylaw.com](mailto:service@sjbrodylaw.com)

The undersigned, a non-attorney, certifies, under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, that she served this Proof of Service of Subpoena to Nest, by email transmission to the addresses, at the email addresses shown above on September 12, 2017; and further that the statements set forth in this Proof of Service are true and correct.



David W. McArdle, Atty. No. 06182127  
[dmcardle@zrfmlaw.com](mailto:dmcardle@zrfmlaw.com)  
Zukowski, Rogers, Flood & McArdle  
Attorneys for Counter-Plaintiff Karen Lukasik  
50 Virginia Street, Crystal Lake, Illinois 60014  
(815) 459-2050

Helen A. Harkins

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT  
MCHENRY COUNTY, ILLINOIS

Andrew Gasser

vs.

Case Number 17CH435

Karen Lukasik, et al.

**SUBPOENA FOR PRODUCTION OF SPECIFIED DOCUMENTS,  
OBJECTS OR TANGIBLE THINGS**

TO: Walter Alarm Services, Inc. c/o Martin Walter

ADDRESS: 110 W. Woodstock Street, Crystal Lake, IL 60014

You are directed to produce the following documents, objects or tangible things: See Exhibit A

on the following time and date: June 27, 2017 at 9:00 a.m.

**YOUR FAILURE TO RESPOND TO THIS SUBPOENA OR TO COMPLY WITH COURT RULES MAY  
SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.**

**YOU MAY COMPLY WITH THIS SUBPOENA BY MAILING LEGIBLE AND COMPLETE COPIES  
OF ALL SPECIFIED DOCUMENTS, OBJECTS OR TANGIBLE THINGS REQUESTED IN THIS SUBPOENA  
TO THE PARTY OR LAW FIRM WHOSE ADDRESS APPEARS BELOW. COMPLIANCE BY MAIL  
REQUIRES A CERTIFICATION THAT THE DOCUMENTS, OBJECTS OR TANGIBLE THINGS MAILED ARE  
COMPLETE AND ACCURATE AND CONSTITUTE GOOD FAITH COMPLIANCE WITH THE MATERIALS  
REQUESTED BY SAID SUBPOENA. DO NOT FORWARD MATERIALS BEFORE DATE STATED ON  
SUBPOENA.**

Items to be delivered to the following party of law firm at the following address: Jacob D. Gaudill  
Zukowski, Rogers, Flood & McArdle, 50 Virginia Street, Crystal Lake, IL 60014



WITNESS June 13, 20 17

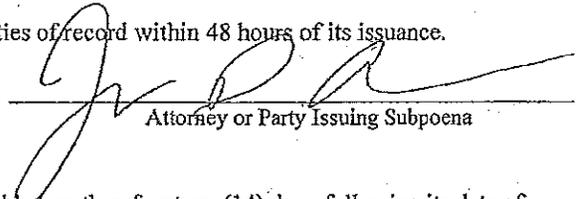
*Katherine M. Keefe*

CLERK OF THE CIRCUIT COURT

Name Zukowski, Rogers, Flood & McArdle  
Attorney for Defendant, Karen Lukasik  
Address 50 Virginia Street  
City, State Zip Crystal Lake, IL 60014  
Telephone 815/459-2050

**SERVICE ON PARTIES OF RECORD**

I served or will serve a copy of this Subpoena on all parties of record within 48 hours of its issuance.

  
\_\_\_\_\_  
Attorney or Party Issuing Subpoena

**NOTICE:**

No Subpoena issued under this provision may be returnable less than fourteen (14) days following its date of service. Within said fourteen (14) days, any party may timely object to the Court to the utilization of the Subpoena.

The party causing the Subpoena to be issued shall be liable to the party subpoenaed for the reasonable costs of copying or reproduction. The court may enter such orders as may be necessary to enforce payment of copying costs. Any party may request copies of all materials obtained by this Subpoena. Expenses of copying shall be reproduced and forwarded to the requesting party not less than ten (10) business days following receipt of subpoenaed materials.

**CERTIFICATION BY SUBPOENAED PARTY OR AGENT**

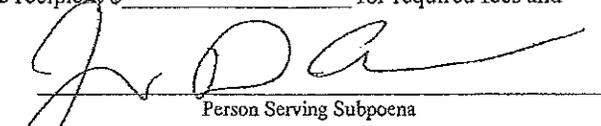
I am the custodian of the records of the person or entity subpoenaed herein, and I certify that I have completely and accurately complied with the Subpoena and have provided all the specified documents, objects or tangible things requested which are in my constructive or actual possession or control.

DATE \_\_\_\_\_  
\_\_\_\_\_  
Keeper of Records and Person Answering Subpoena

**SERVICE**

**PERSONAL SERVICE:**

I served this Subpoena by handing a copy to Martin Vatter on June 13, 20 17. I paid the recipient \$ --- for required fees and mileage expenses, if any.

  
\_\_\_\_\_  
Person Serving Subpoena

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of June, 20 17.

\_\_\_\_\_  
Notary Public

**SERVICE BY CERTIFIED OR REGISTERED MAIL:** I served this Subpoena by placing same with the U.S. Mail, restricted delivery, return receipt requested, prepaid, and addressed to the individual or organization listed on page one hereof, at the address listed on page one hereof, together with \$ \_\_\_\_\_ for fees and mileage expenses, if any. I mailed the above on \_\_\_\_\_, 20 \_\_\_\_\_ at \_\_\_\_\_. I received the return on such mailing indicating it was received on \_\_\_\_\_, 20 \_\_\_\_\_ by \_\_\_\_\_ at the address listed on page one.

\_\_\_\_\_  
Person Mailing Subpoena and Receiving Return

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

Exhibit A

You are directed to produce the following documents, objects or tangible things: All hard drives, DVIs, flash drives, disc drives, and other computer equipment that was removed from Algonquin Township and/or the Algonquin Township Highway Department after June 1, 2017, including, but not limited to, all video security footage, copiers, and scanners (collectively "Requested Information"). Also produce any correspondence, electronic or otherwise, between you and any Algonquin Township officer or employee relating to the Requested Information after June 1, 2017, and any bills or invoices that you may have generated as a result.

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>nd</sup> JUDICIAL CIRCUIT  
McHENRY COUNTY

**Katherine M. Keefe**  
Clerk of the Circuit Court  
\*\*\*Electronically Filed\*\*\*  
Transaction ID: 1711188846  
17CH000435  
07/13/2017  
McHenry County, Illinois  
22nd Judicial Circuit  
\*\*\*\*\*

Andrew Gasser )

vs. )

Karen Lukasik, et al. )

Case Number 17 CH 435

**SUBPOENA**

To: Dylan Stern, Algonquin Township, 3702 U.S. Highway 14, Crystal Lake, Illinois 60014

YOU ARE COMMANDED to appear to testify before the Honorable Judge Caldwell in the  
Circuit Court Room 204, McHenry County Government Center, 2200 N. Seminary Avenue, Woodstock, Illinois,  
on Friday, July 14, 2017 at 1:30 P.M.

YOU ARE COMMANDED also to bring the following:

in your possession or control.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO  
PUNISHMENT FOR CONTEMPT OF THIS COURT.

Witness July 6, 2017



*Katherine M. Keefe*

Clerk of the Circuit Court

Name Zukowski, Rogers, Flood & McArdle  
Attorney for Karen Lukasik  
Address 50 Virginia Street  
City, State, Zip Crystal Lake, IL 60014  
Telephone 815/459-2050

I served this subpoena by handing a copy to Dylan Stern on  
July, 20 17. I paid the witness \$ 26.00 for witness and mileage fees.

Signed and sworn to before me

20 17

Signature

Notary Public

Prepared By David W. McArdle Attorney For Karen Lukasik  
Attorney Registration No. 06182127

CV-SUB3: Revised 12/01/03

**K'S INVESTIGATIONS & SECURITY SERVICE, INC.**

Daniel E. Kinnerk  
116 N. Green Street  
McHenry, IL 60050

IL LIC# 115-000536  
FL LIC# 9600454

Telephone 815/385-3310  
Fax 815/385-0579

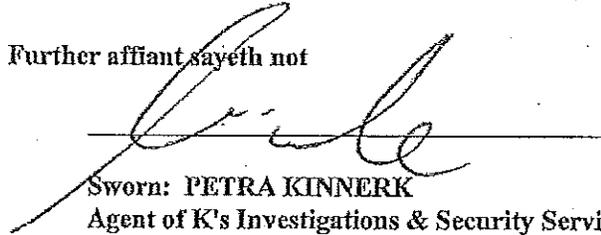
**ANDREW GASSER,**  
**VS.**  
**KAREN LUKASIK, et al.**  
**17 CH 435 MCHENRY COUNTY**

**AFFIDAVIT OF SERVICE**

The affiant states the following under oath:

- 1.) My name is **PETRA KINNERK.**
- 2.) I am an Agent of K's Investigations & Security Service, Inc., a Licensed Private Detective Agency in the State of Illinois
- 3.) I certify that on 7/12/2017 at 6:40 AM I served a SUBPOENA & \$26.00 CHECK (see attached) upon **DYLAN STERN** by handing papers to a Male / White 5'10" 180 LBS AGE 35 who identified himself as **DYLAN STERN** while at his place of work located 3702 U.S. HIGHWAY 14, CRYSTAL LAKE IL 60014.

Further affiant sayeth not

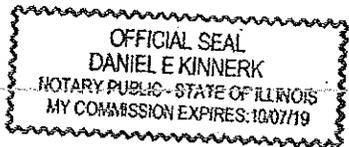


Sworn: **PETRA KINNERK**  
Agent of K's Investigations & Security Service, Inc.  
Illinois Agency License No.117-0000

Subscribed and Sworn to before me

this 12<sup>th</sup> day of July, 2017.

  
Notary Public



# EXHIBIT Y

## Kirk Allen

---

**From:** Kirk Allen  
**Sent:** Wednesday, January 3, 2018 3:19 PM  
**To:** klukasik@algonquintownship.com  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:35 AM  
**To:** klukasik@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. Copy of all credit card, purchase card, and debit card statements since January 1, 2011 for all cards used by any elected official of the Algonquin Township. This would include ALL pages of those statements
2. Copy of all credit card reward point redemptions since January 1, 2011. This would be for any credit card used by any elected official of the Algonquin Township.
3. A copy of the last two Salary Setting and/or Compensation Setting resolutions for all elected officials of Algonquin Township.
4. A copy of all Serious XM subscription records since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me.

Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT Z

**From:** Kirk Allen  
**To:** "[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)"  
**Bcc:** [John Kraft](#)  
**Subject:** FW: FOIA Request  
**Date:** Wednesday, January 3, 2018 3:18:00 PM

---

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:35 AM  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. Copy of all credit card, purchase card, and debit card statements since January 1, 2011 for all cards used by any elected official of the Algonquin Township. This would include ALL pages of those statements
2. Copy of all credit card reward point redemptions since January 1, 2011. This would be for any credit card used by any elected official of the Algonquin Township.
3. A copy of the last two Salary Setting and/or Compensation Setting resolutions for all elected officials of Algonquin Township.
4. A copy of all Serious XM subscription records since January 1, 2011.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of

this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AA

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Saturday, January 6, 2018 1:07:27 PM  
**Attachments:** [Foia Response Letter Allen 1.pdf](#)  
[Resolution for Salaries Elected Officials.pdf](#)

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Your response is attached.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

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**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 3, 2018 3:19:02 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, November 13, 2017 10:35 AM  
**To:** [klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. Copy of all credit card, purchase card, and debit card statements since January 1, 2011 for all cards used by any elected official of the Algonquin Township. This would include ALL pages of those statements
  2. Copy of all credit card reward point redemptions since January 1, 2011. This would be for any credit card used by any elected official of the Algonquin Township.
  3. A copy of the last two Salary Setting and/or Compensation Setting resolutions for all elected officials of Algonquin Township.
  4. A copy of all Serious XM subscription records since January 1, 2011.
- I qualify as both media and non-profit under the definitions in Section 2 (c-10)

("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the

method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AB

## Kirk Allen

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**From:** Kirk Allen  
**Sent:** Wednesday, November 29, 2017 5:07 PM  
**To:** Karen Lukasik  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of any records that the current Algonquin Township Clerk removed from the offices of the Highway Commissioner, Township Supervisor, and Township

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AC

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Cc:** [jkelly@mkm-law.com](mailto:jkelly@mkm-law.com); [Natalie Pesln](#)  
**Subject:** FOIA Response  
**Date:** Wednesday, December 6, 2017 3:04:46 PM  
**Attachments:** [Outlook-1497565392.png](#)

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Dear Mr. Allen:

Thank you for writing to Algonquin Township with your request for information pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq. On November 29, 2017, you requested:

1. A copy of any records that the current Algonquin Township Clerk removed from the offices of the Highway Commissioner, Township Supervisor, and Township.

There are no documents responsive to your request. The FOIA officer for this response is the Algonquin Township Clerk, Karen Lukasik.

Regards,



Karen Lukasik  
Algonquin Township Clerk  
(847) 639-2700  
[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)

# EXHIBIT AD

**From:** Kirk Allen  
**To:** "Karen Lukasik"  
**Bcc:** John Kraft; "Rob Hanlon"  
**Subject:** FOIA Request  
**Date:** Wednesday, December 6, 2017 10:15:00 PM

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In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of Robert Miller's Annual Reports filed with the Board of Trustees for the last 24 years as required by law.
2. A copy of the Audit referenced in the February 25, 1997 Memorandum from Tom Schober. This audit is reported to have been done regarding Rober Miller's past employment and reports a claimed sick day entitlement.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AE

LAW OFFICES OF  
**MATUSZEWICH & KELLY, LLP**

101 N. Virginia St., Suite 150  
Crystal Lake, Illinois 60014  
(815) 459-3120 Telephone  
(815) 459-3123 Facsimile

December 13, 2017

VIA E-MAIL at [kirk@illinoisleaks.com](mailto:kirk@illinoisleaks.com)

Mr. Kirk Allen  
PO Box 593  
Kansas, IL 61933

**Re: FOIA Request, Dated December 6, 2017**

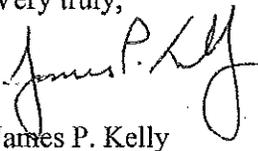
Dear Mr. Allen:

Thank you for writing to Algonquin Township with your request for information pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq. On December 6, 2017, you requested:

1. A copy of Robert Miller's Annual Reports filed with the Board of Trustees for the last 24 years as required by law.
2. A copy of the Audit referenced in the February 25, 1997 Memorandum from Tom Schober. This audit is reported to have been done regarding Robert Miller's past employment and reports a claimed sick day.

In accordance with 5 ILCS 140/3(e)(ii), we require an additional five (5) business days to respond to the request as the request requires the collection of a substantial number of specified records. Therefore, the requested documents will be available on December 20, 2017.

Very truly,

  
James P. Kelly

# EXHIBIT AF

**From:** [Kirk Allen](#)  
**To:** [masevey@mkm-law.com](mailto:masevey@mkm-law.com)  
**Bcc:** [Rob Hanlon](#); [Edwards, Brad A](#); [John Kraft](#)  
**Subject:** FOIA Requests.  
**Date:** Wednesday, January 3, 2018 11:29:00 AM  
**Attachments:** [FOIA Request.msg](#)  
[FOIA Request.msg](#)  
[FOIA Request.msg](#)

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I have several FOIA requests to the Algonquin Township that are well past due, to include one that your firm assured me would be provided by the 20<sup>th</sup> of December.

Please advice on the Township's intentions regarding all past due FOIA request.

-

Attached are some of the more recent requests, which are all past due.

-

[Kirk Allen](#)

# EXHIBIT AG

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Cc:** [Natalie Pesin](#)  
**Subject:** RE: FOIA Request  
**Date:** Thursday, January 11, 2018 8:25:17 PM  
**Attachments:** [Folia Response Letter Allen 6.docx](#)  
[Annual Report Pt. 1.pdf](#)

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Your response is attached.

Regards,  
Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen [mailto:[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)]  
**Sent:** Wednesday, January 3, 2018 3:15 PM  
**To:** Karen Lukasik <[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)>  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Wednesday, December 6, 2017 10:15 PM  
**To:** Karen Lukasik <[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)>  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of Robert Miller's Annual Reports filed with the Board of Trustees for the last 24 years as required by law.
2. A copy of the Audit referenced in the February 25, 1997 Memorandum from Tom Schober. This audit is reported to have been done regarding Rober Miller's past employment and reports a claimed sick day entitlement.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the

Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,

Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AH

## Kirk Allen

---

**From:** Kirk Allen  
**Sent:** Sunday, December 17, 2017 1:47 PM  
**To:** Karen Lukasik  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all digital images of public records taken with a mobile device, such as a cell phone, tablet, and/or other similar device between May 15, 2017 through June 30th, 2017. The request applies to digital images of public records made by the Supervisor, Highway Commissioner and Clerk during the above referenced timeline.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AI

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Cc:** [Natalie Pesin](#); [jokelly@mkm-law.com](mailto:jokelly@mkm-law.com)  
**Subject:** Re: FOIA Request  
**Date:** Thursday, January 4, 2018 1:52:29 PM

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Dear Mr. Allen,

Thank you for writing to the Algonquin Township with your request for information pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq. On December 17th, 2017, you requested:

"A copy of all digital images of public records taken with a mobile device, such as a cell phone, tablet, and/or other similar device between May15, 2017 through June 30th, 2017. The request applies to digital images of public records made by the Supervisor, Highway Commissioner and Clerk during the above referenced timeline".

There are no documents responsive to your request for the Township Supervisor and Township Clerk. I have forwarded your request to the Highway Commissioner for his office to answer.

Regards,

Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen <[Kirk@illinoisleaks.com](mailto:Kirk@illinoisleaks.com)>  
**Sent:** Wednesday, January 3, 2018 3:14 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Sunday, December 17, 2017 1:47 PM  
**To:** Karen Lukasik <[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)>  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops

any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

- 1. A copy of all digital images of public records taken with a mobile device, such as a cell phone, tablet, and/or other similar device between May 15, 2017 through June 30th, 2017. The request applies to digital images of public records made by the Supervisor, Highway Commissioner and Clerk during the above referenced timeline.**

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of

personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AJ

## Kirk Allen

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**From:** Kirk Allen  
**Sent:** Monday, December 18, 2017 3:19 PM  
**To:** Karen Lukasik  
**Cc:** Ryan@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all agreements, contracts or any other form of approval for a private business named Liberty Signs to place their advertising billboard on Township Property.
2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AK

**From:** Kirk Allen  
**To:** "klukasik@algonquintownship.com"  
**Bcc:** John Kraft  
**Subject:** FW: FOIA Request  
**Date:** Wednesday, January 3, 2018 3:13:00 PM

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**From:** Kirk Allen  
**Sent:** Monday, December 18, 2017 3:19 PM  
**To:** Karen Lukasik <klukasik@algonquintownship.com>  
**Cc:** Ryan@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all agreements, contracts or any other form of approval for a private business named Liberty Signs to place their advertising billboard on Township Property.
2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AL

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Thursday, January 11, 2018 8:13:23 PM  
**Attachments:** [Fola Response Letter Allen 5.docx](#)  
[Liberty Lease 2017.pdf](#)

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Your response is attached. For the emails from the past Highway Commissioner that you have requested you will need to click this link.

[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMC0Epk&e=dMZqcF](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMC0Epk&e=dMZqcF)

Thank you,

Karen Lukasik

Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 3, 2018 3:13:57 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, December 18, 2017 3:19 PM  
**To:** Karen Lukasik <klukasik@algonquintownship.com>  
**Cc:** Ryan@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

- 1. A copy of all agreements, contracts or any other form of approval for a private business named Liberty Signs to place their advertising billboard on Township Property.**
- 2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.**

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AM

**From:** Kirk Allen  
**To:** "Karen Lukasik"  
**Bcc:** John Kraft; "Rob Hanlon"  
**Subject:** RE: FOIA Request  
**Date:** Wednesday, January 17, 2018 11:31:00 AM

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In accordance with 5 ILCS 140/8.5(b), I am re-submitting my request for the emails requested as the link provided has not provided reasonable access to the requested records.

Please provide the requested records to on a media device and mail it to me.

Kirk Allen  
PO Box 593  
Kansas, IL 61933

(5 ILCS 140/8.5)

**Sec. 8.5. Records maintained online.**

(a) Notwithstanding any provision of this Act to the contrary, a public body is not required to copy a public record that is published on the public body's website. The public body shall notify the requester that the public record is available online and direct the requester to the website where the record can be reasonably accessed.

(b) If the person requesting the public record is unable to reasonably access the record online after being directed to the website pursuant to subsection (a) of this Section, the requester may re-submit his or her request for the record stating his or her inability to reasonably access the record online, and the public body shall make the requested record available for inspection or copying as provided in Section 3 of this Act.  
(Source: P.A. 98-1129, eff. 12-3-14.)

**From:** Karen Lukasik [mailto:klukasik@algonquintownship.com]  
**Sent:** Thursday, January 11, 2018 8:13 PM  
**To:** Kirk Allen <Kirk@illinoisleaks.com>  
**Subject:** Re: FOIA Request

Your response is attached. For the emails from the past Highway Commissioner that you have requested you will need to click this link.

[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF)

Thank you,

Karen Lukasik

Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 3, 2018 3:13:57 PM  
**To:** Karen Lukasik

**Subject:** FW: FOIA Request

**From:** Kirk Allen

**Sent:** Monday, December 18, 2017 3:19 PM

**To:** Karen Lukasik <[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)>

**Cc:** [Ryan@algonquintownship.com](mailto:Ryan@algonquintownship.com)

**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

- 1. A copy of all agreements, contracts or any other form of approval for a private business named Liberty Signs to place their advertising billboard on Township Property.**
- 2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.**

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings

individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

EXHIBIT AN

**From:** [Karen Lukasik](#)  
**To:** [Kirk Allen](#)  
**Subject:** Re: FOIA Request  
**Date:** Monday, January 22, 2018 11:11:54 AM

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Mr. Allen,

You can open the files if you have Microsoft Outlook. If you still have difficulty opening the files please let me know and I will copy them to scan disk and mail them to you. I wanted to offer the option of Microsoft Outlook first to you for an expeditious option of obtaining them as opposed to waiting for them to be mailed.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 17, 2018 11:31 AM  
**To:** Karen Lukasik  
**Subject:** RE: FOIA Request

In accordance with 5 ILCS 140/8.5(b), I am re-submitting my request for the emails requested as the link provided has not provided reasonable access to the requested records.

Please provide the requested records to on a media device and mail it to me.

Kirk Allen  
PO Box 593  
Kansas, IL 61933

(5 ILCS 140/8.5)

**Sec. 8.5. Records maintained online.**

(a) Notwithstanding any provision of this Act to the contrary, a public body is not required to copy a public record that is published on the public body's website. The public body shall notify the requester that the public record is available online and direct the requester to the website where the record can be reasonably accessed.

(b) If the person requesting the public record is unable to reasonably access the record online after being directed to the website pursuant to subsection (a) of this Section, the requester may re-submit his or her request for the record stating his or her inability to reasonably access the record online, and the public body shall make the requested record available for inspection or copying as provided in Section 3 of this Act.

(Source: P.A. 98-1129, eff. 12-3-14.)

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**From:** Karen Lukasik [mailto:[klukasik@algonquintownship.com](mailto:klukasik@algonquintownship.com)]  
**Sent:** Thursday, January 11, 2018 8:13 PM  
**To:** Kirk Allen <Kirk@illinoisleaks.com>  
**Subject:** Re: FOIA Request

Your response is attached. For the emails from the past Highway Commissioner that you have

requested you will need to click this link.

[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF)

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 3, 2018 3:13:57 PM  
**To:** Karen Lukasik  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, December 18, 2017 3:19 PM  
**To:** Karen Lukasik <klukasik@algonquintownship.com>  
**Cc:** Ryan@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

- 1. A copy of all agreements, contracts or any other form of approval for a private business named Liberty Signs to place their advertising billboard on Township Property.**
- 2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.**

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent

requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,

Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AO

**From:** Kirk Allen  
**To:** "Karen Lukasik"  
**Bcc:** "Rob Hanlon"; John Kraft  
**Subject:** RE: FOIA Request  
**Date:** Monday, January 22, 2018 11:20:00 AM

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Please mail them.

Thank you.

Kirk Allen

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**From:** Karen Lukasik [mailto:klukasik@algonquintownship.com]  
**Sent:** Monday, January 22, 2018 11:12 AM  
**To:** Kirk Allen <Kirk@illinoisleaks.com>  
**Subject:** Re: FOIA Request

Mr. Allen,

You can open the files if you have Microsoft Outlook. If you still have difficulty opening the files please let me know and I will copy them to scan disk and mail them to you. I wanted to offer the option of Microsoft Outlook first to you for an expeditious option of obtaining them as opposed to waiting for them to be mailed.

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>  
**Sent:** Wednesday, January 17, 2018 11:31 AM  
**To:** Karen Lukasik  
**Subject:** RE: FOIA Request

In accordance with 5 ILCS 140/8.5(b), I am re-submitting my request for the emails requested as the link provided has not provided reasonable access to the requested records.

Please provide the requested records to on a media device and mail it to me.

Kirk Allen  
PO Box 593  
Kansas, IL 61933

(5 ILCS 140/8.5)

**Sec. 8.5. Records maintained online.**

(a) Notwithstanding any provision of this Act to the contrary, a public body is not required to copy a public record that is published on the public body's website. The public body shall notify the requester that the public record is available online and direct the requester to the website where the record can be reasonably accessed.

(b) If the person requesting the public record is unable to reasonably access the record online after being directed to the website pursuant to subsection (a) of this Section, the requester may re-submit his or her request for the record

stating his or her inability to reasonably access the record online, and the public body shall make the requested record available for inspection or copying as provided in Section 3 of this Act.  
(Source: P.A. 98-1129, eff. 12-3-14.)

**From:** Karen Lukasik [mailto:klukasik@algonquintownship.com]

**Sent:** Thursday, January 11, 2018 8:13 PM

**To:** Kirk Allen <Kirk@illinoisleaks.com>

**Subject:** Re: FOIA Request

Your response is attached. For the emails from the past Highway Commissioner that you have requested you will need to click this link.

[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?folderid=0e20eb6a425bc4c34a640f793223c5d4d&authkey=AX4Kk03SWZJzsKgKEMCOEpk&e=dMZqcF)

Thank you,  
Karen Lukasik  
Algonquin Township Clerk

---

**From:** Kirk Allen <Kirk@illinoisleaks.com>

**Sent:** Wednesday, January 3, 2018 3:13:57 PM

**To:** Karen Lukasik

**Subject:** FW: FOIA Request

**From:** Kirk Allen

**Sent:** Monday, December 18, 2017 3:19 PM

**To:** Karen Lukasik <klukasik@algonquintownship.com>

**Cc:** Ryan@algonquintownship.com

**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

**1. A copy of all agreements, contracts or any other form of approval for a**

**private business named Liberty Signs to place their advertising billboard on Township Property.**

**2. A copy of all emails from all email accounts used by Bob Miller between January 1, 2013 and October 15, 2017.**

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public

interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AP

## Kirk Allen

---

**From:** Kirk Allen  
**Sent:** Friday, January 19, 2018 8:52 AM  
**To:** Karen Lukasik; supervisor@algonquintownship.com;  
highwaydepartment@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

1. A copy of all invoices submitted for computer IT services provided to any Township office between the months of January 2017 and May 31<sup>st</sup>, 2017. This would include any computer maintenance, repairs, programing, and any other type of work being performed on Township computers.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,

Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AQ

## Kirk Allen

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**From:** Kirk Allen  
**Sent:** Tuesday, December 19, 2017 3:51 PM  
**To:** Karen Lukasik; Ryan@algonquintownship.com  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all invoices for IT computer work for the last 5 years.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific

purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

# EXHIBIT AR

## Kirk Allen

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**From:** Kirk Allen  
**Sent:** Wednesday, January 3, 2018 3:15 PM  
**To:** 'klukasik@algonquintownship.com'  
**Subject:** FW: FOIA Request

**From:** Kirk Allen  
**Sent:** Monday, November 27, 2017 11:17 AM  
**To:** Karen Lukasik <klukasik@algonquintownship.com>  
**Subject:** FOIA Request

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

NOTE that a FOIA request requires the requested records be retained and stops any record destruction authorized prior to the FOIA. You can confirm with the Local Records Commission on this information.

1. A copy of all subpoena's received by the Township in the last 12 months.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests for commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of an urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the timeframe for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would appreciate receiving them electronically.

Thanks,  
Kirk Allen  
PO Box 593  
Kansas, IL 61933

**EXHIBIT AS**

## Kirk Allen

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**From:** Kirk Allen  
**Sent:** Wednesday, January 17, 2018 11:33 AM  
**To:** Karen Lukasik  
**Subject:** RE: FOIA Response

In accordance with 5 ILCS 140/8.5(b), I am re-submitting my request as the link provided has not provided reasonable access to the requested records.

Please provide the requested records on a media device and mail it to me.

Kirk Allen  
PO Box 593  
Kansas, IL 61933

---

**From:** Karen Lukasik [mailto:klukasik@algonquintownship.com]  
**Sent:** Thursday, January 11, 2018 8:38 PM  
**To:** Kirk Allen <Kirk@illinoisleaks.com>  
**Subject:** FOIA Response

Mr. Allen

Your FOIA Response is attached. You will need to click the following links to view the Annual Reports that were found.

[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?docid=14ced0c29addc40eb8f49eeb65ab0d0a9&authkey=AXSRAaPKS\\_pTxCS2vWrbhF0&e=AbIIKL](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?docid=14ced0c29addc40eb8f49eeb65ab0d0a9&authkey=AXSRAaPKS_pTxCS2vWrbhF0&e=AbIIKL)  
[https://algonquinsupervisor-my.sharepoint.com/personal/klukasik\\_algonquintownship\\_com/\\_layouts/15/guestaccess.aspx?docid=1c040760c377642d38e6519d9dee4db47&authkey=AU71vUbrc\\_Lz96KZUQ6AuCU&e=MaMaGO](https://algonquinsupervisor-my.sharepoint.com/personal/klukasik_algonquintownship_com/_layouts/15/guestaccess.aspx?docid=1c040760c377642d38e6519d9dee4db47&authkey=AU71vUbrc_Lz96KZUQ6AuCU&e=MaMaGO)

Regards,  
Karen Lukasik  
Algonquin Township Clerk