

IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA, AND TIM GRANT)

Plaintiffs,)

v.)

Case No. 19 CH 1143

WESLEY TOWNSHIP AND WESLEY)
TOWNSHIP ROAD DISTRICT,)

Defendants.)

AFFIDAVIT OF SARAH NORTON

I, **SARAH NORTON**, being first duly sworn, under penalties as provided by law, certify that I have reviewed the statements contained in this affidavit; that I have personal knowledge of the facts stated herein; that if called as a witness in any proceeding, I could competently testify to the facts stated in this affidavit; and that the statements contained in this affidavit are true and correct, except as to any matters stated to be on information and belief, and as to those matters I certify that I verily believe them to be true.

- 1) I was the Wesley Township Clerk commencing in July 2018 or thereabouts and served as the Wesley Township Clerk up until I resigned in August 2019, or thereabouts .
- 2) At the time I was the Wesley Township Clerk, I received numerous requests from Cynthia Brzana and Tim Grant pursuant to the freedom of information act as shown in the amended complaint, in the above entitled action. I further did not respond to numerous F.O.I.A. requests from people I perceived as opposing my political interests including but not limited to Connie Hale Forsythe, Kirk Allen and John Kraft.
- 3) I knowingly and willfully decided not to provide information in the Freedom of Information Act requests to either Cynthia Brzana or Tim Grant even though I provided most of that information to my father, John Norton. I also provided access to video's to my father, John Norton, that I did not provide to others that requested the same videos. My decision to withhold the documents requested by Plaintiffs, Cynthia Brzana and Tim Grant, was based on my personal desire to not respond and based on the request of my father, that I not respond. My failure to respond to Cynthia Brzana's and Tim Grant's F.O.I.A. requests was not the act of negligence or inadvertence. Rather, the failure to respond to Cynthia Brzana's and Tim Grant's FOIA requests was my conscience and willful actions.

- 4) I acknowledge that Attorney Robert T. Hanlon has not represented me at any time and has given me the opportunity to obtain an independent legal opinion before I executed this affidavit.
- 5) As it relates to each of the requests in the attached complaint identified as requests 1-35 and Exhibits A through AI in the First Amended Complaint, I willfully and consciously did not respond to any of those requests and each remained outstanding as of the date I resigned as the Wesley Township Clerk.
- 6) I freely and voluntarily provided this affidavit knowing of the risks to my penal and pecuniary interests.

Affiant further Sayeth Naught



SARAH NORTON

Subscribed and Sworn to
before me this 3rd day of May, 2020



NOTARY PUBLIC