

EXHIBIT A

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT WILL COUNTY, ILLINOIS

CYNTHIA BRZANA and TIM GRANT,)
)
 Plaintiffs,)
)
 v.)
) Case No. 2019 CH 1143
 WESLEY TOWNSHIP and WESLEY)
 TOWNSHIP ROAD DISTRICT,)
)
 Defendants.)

Affidavit of Sarah Norton

I, Sarah Norton, after being duly sworn, state under oath as follows:

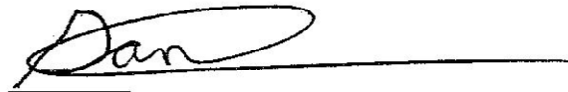
1. I am over 18 years of age, and the statements made in this Affidavit are based on my personal knowledge. If called to testify, I could competently testify to the facts stated herein.
2. On or around May 3rd, 2020, I signed an affidavit stating, among other things, that I willfully and intentionally refused to answer FOIA requests from Cynthia Brzana and Tim Grant while I was the Wesley Township Clerk.
3. I was pressured into signing this affidavit by Brzana and Grant's attorney, Robert Hanlon.
4. Mr. Hanlon came to my workplace unannounced around midnight. I work there alone, so only him and I were there. I felt intimidated because Mr. Hanlon is a large man and is a lawyer.
5. Mr. Hanlon is currently representing Ms. Brzana in a lawsuit in which my grandfather, father, and I are the defendants. That lawsuit is captioned *Cynthia Brzana and Michael Esposito v. Kathleen Kennedy, Donald Norton, John Norton, and Sarah Norton*, 2018-L-718. Mr. Hanlon told me that if I signed the affidavit he would dismiss me as a defendant from this lawsuit.

6. I felt intimidated and scared. Mr. Hanlon started to say mean things about my father, and I just wanted him to leave. I signed the affidavit that he gave me so that he would go away. I did not really read through the affidavit before I signed it.
7. Not everything in the affidavit I signed is true. Everything in the affidavit was written by Mr. Hanlon, not by me. Mr. Hanlon did not consult with me before he drafted the affidavit.
8. One thing in the affidavit that is not true are the sentences where I say that I willfully and intentionally refused to answer FOIA requests submitted by Ms. Brzana and Mr. Grant.
9. I did my best to answer their FOIA requests on time. However, the Township received lots of FOIA requests, sometimes fifty in one weekend. It was mostly just me answering the FOIA requests, and I simply could not keep up with all of them.
10. I tried my best but just did not have the time or ability to answer every FOIA request submitted by Ms. Brzana and Mr. Grant.
11. I am very sorry for any confusion I have caused. I have always tried to work hard and do my best. I would not have signed the affidavit given to me by Mr. Hanlon if I was not scared and intimidated at the time.

FURTHER AFFIANT SAYETH NAUGHT.

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this affidavit are true and correct.

Executed on September 9, 2020



Sarah Norton

SUBSCRIBED and SWORN to
before me this 9 day of September, 2020.



Notary Public
9/9/2020

