

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

ROBERT EDWARD DORMAN)
PLAINTIFF)
)
)
v.)
)
MADISON COUNTY TREASURER)
CHRIS SLUSSER)
DEFENDANT)

Case No. 2021MR000494

COMPLAINT

NOW COME PLAINTIFF, ROBERT EDWARD DORMAN, Pro Se for his complaint against the Defendant, THE MADISON COUNTY TREASURER CHRIS SLUSSER, and pursuant to 5 ILCS 140/1 *et seq.*, and in support of their complaint states as follows.

1. Pursuant to 735 ILCS 5/2-101, venue for this action lies in this court in that a) The Madison County Treasurers office is a public agency in Madison County, and b) the activity of which Plaintiff occurred is in Madison County.
2. Plaintiff ROBERT EDWARD DORMAN, is a resident of Madison County.
3. Pursuant to the 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.
4. 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 government activities that affect the conduct of government and the lives of the people. 5 ILCS 140/1
5. 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
6. Under the FOIA Section 11(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.”

THE FREEDOM OF INFORMATION ACT REQUEST BY PLAINTIFF

7. On September 4th, 2020, Plaintiff submitted a FOIA request to the Defendant THE MADISON COUNTY TREASURER CHRIS SLUSSER for digital copies of any email to or from Jason Plummer to or from cjslusser@yahoo.com from Dec 1, 2017 through Sep 5, 2020.

**THE DENIAL RESPONSE BY DEFENDANT THE MADISON COUNTY TREASURER
CHRIS SLUSSER TO PLAINTIFF**

8. On September 10th, 2020 Defendant THE MADISON COUNTY TREASURER CHRIS SLUSSER, responded to the request via email as “?Mr. Dorman: We have no records for this request. Thanks, Chris Slusser Madison County Treasurer.”

**EVIDENCE THAT THE MADISON COUNTY TREASURER CHRIS SLUSSER USES
PERSONAL EMAIL FOR COUNTRY BUSINESS TO CIRCUMVENT THE ACT
and
EVIDENCE THAT THE MADISON COUNTY TREASURER CHRIS SLUSSER FAILED
TO PROVIDE RESPONSIVE RECORDS**

9. On September 11th, 2020 Plaintiff emailed the Illinois Senate under the provisions of the ACT and asked “Please provide digital copies of any and all email from Senator Plummer to cjslusser@yahoo.com from December 1. 2016 through September 11, 2020. Ty”

10. On September 18th 2020 the ILLINOIS STATE SENATE FREEDOM OF INFORMATION ACT OFFICER provided 22 pages of responsive documents.

WHEREFORE, Plaintiff prays that this Court:

- In accordance with FOIA Section 11(f), afford this case precedence on the Court’s docket except as for 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.
- Declare that the Office of THE MADISON COUNTY TREASURER CHRIS SLUSSER violated the Freedom Of Information Act .
- Order the Office of THE MADISON COUNTY TREASURER CHRIS SLUSSER to search for and produce the requested records.
- Enjoin the Office THE MADISON COUNTY TREASURER CHRIS SLUSSER from withholding non-exempt public records under FOIA.
- Order the Office of Defendant THE MADISON COUNTY TREASURER CHRIS SLUSSER to pay civil penalties.

- Award Court costs and other relief as the Court considers appropriate.

RESPECTFULLY SUBMITTED

/s/ Robert Edward Dorman

Robert Edward Dorman

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