

**THE FOURTH CIRCUIT
SHELBY COUNTY, ILLINOIS**

Cody Brands,

Plaintiff,

v.

**Shelby County, Illinois, and Shelby County
Dive Team,**

Defendant.

Case No.: 2024CH6

Judge:

Complaint

Plaintiff Cody Brands (“Plaintiff”), files his Complaint against Defendants Shelby County and the Shelby County Dive Team (the “Dive Team”, together “Defendants”) to force its compliance with Illinois’ Freedom of Information Act (“FOIA”), as codified at 5 ILCS § 140/1, *at seq.*, and produce the demanded records. Plaintiff alleges the following based on personal knowledge stemming from their acts and experiences, an investigation conducted by their attorneys, and upon information and belief. Accordingly, Plaintiff alleges as follows:

The Parties, Jurisdiction, and Venue

1. The Plaintiff, Cody Brands is an individual residing Illinois and a citizen of the same.
2. Defendant, Shelby County, Illinois is a public body, as defined by FOIA’s Section 2(a)
3. Defendant, Shelby County Dive Team is a water rescue and recovery department established pursuant to the Illinois Water Rescue Act, as codified at 50 ILCS 755/1, *et seq.*, and authorized by Shelby County Board Resolution and under the oversight of Shelby County Boards’s Public Safety Committee.

4. The Defendant, Shelby County Dive Team, is a public body, as defined by FOIA's Section 2(a), located in Shelby County, Illinois.

5. Jurisdiction is proper in this Court because Plaintiff is a citizen and resident of Illinois and Defendants are Public Bodies under FOIA subject to the jurisdiction of the same.

6. Venue is proper based on 735 ILCS §§ 5/2-101, 103, which, *inter alia*, requires suit be brought in the county in which the transaction or some part of the transaction occurred or the cause of action arose; and 5 ILCS § 140/11, which provides, *inter alia*, that a lawsuit to enforce a demand for documents under FOIA may be brought in the county where the public body is located.

Illinois' Freedom of Information Act

7. Illinois' FOIA statute declares that it is "the public policy of the State of Illinois that all persons¹ are entitled to full and complete information regarding the affairs of government and the official acts and policies of those who represent them as public officials and public employees consistent with the terms of this Act." 5 ILCS § 140/1.

8. The Illinois Legislature continues to recognize that "such access is necessary to enable the people to fulfill their duties of discussing public issues fully and freely, making informed political judgments and monitoring government to ensure that it is being conducted in the public interest." *Id.*, at § 140/1.

9. "Restraints on access to information, to the extent permitted by this Act, 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 activity that affect the conduct of government and the lives of any or all of the people. ... This Act

1. "'Person[s]' means any individual, corporation, partnership, firm, organization or association, acting individually or as a group." 5 ILCS § 140/2(b)

shall be construed to require disclosure of requested information as expeditiously and efficiently as possible and adherence to the deadlines established in this Act. Id., at § 140/1.

10. “All records in the custody or possession of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt.” Id., at § 140/1.2.

11. In furtherance of the Illinois’ Legislatures above goals unless otherwise exempt, public bodies must comply with requests for public documents and information. Id., at §§ 140/1.2, 140/3.

12. Once a request is received, “[e]ach public body shall, promptly, either comply with or deny a request for public records within 5 business days after its receipt of the request[.]” Id., at § 140/3(d). Such time to respond may be extended for an additional five (5) business days based on good causes. Id., at § 140/3(e).

13. “[A] [d]enial shall be in writing as provided in Section 9 of this Act. Failure to comply with a written request, extend the time for response, or deny a request within 5 business days after [a requests] receipt shall be considered a denial of the request.” Id., at § 140/3(d).

14. Moreover, FOIA outlines a number of requirements for a public body and its FOIA Officer to adhere to once it receives a request for a public record. Such requirements include: (1) noting date the request was received; (2) computing the response deadline; (3) creating and maintaining an electronic or paper record of the request until the request is complied with or denied; and (4) creating a file for the retention of the request, response, and all communications concerning the same. 5 ILCS § 140/3.5(a).

15. FOIA also states that if a request is denied, the public body must, *inter alia*, “notify the requester in writing of the decision to deny the request, the reasons for the denial, including a

detailed factual basis for the application of any exemption claimed, and the names and titles or positions of each person responsible for the denial.” Id., at § 140/9(a).

16. To enforce the public’s right to access public information, FOIA provides a private right of action whereby: “[a]ny person denied access to inspect or copy any public record by a public body may file suit for injunctive or declaratory relief.” Id., at § 140/11(a).

17. “If a person seeking the right to inspect or receive a copy of a public record prevails in a proceeding under this Section, the court shall award such person reasonable attorney’s fees and costs.” Id., at § 140/11(i).

18. Moreover, “[i]f the court determines that a public body willfully and intentionally failed to comply with this Act, or otherwise acted in bad faith, the court shall also impose upon the public body a civil penalty of not less than \$2,500 nor more than \$5,000 for each occurrence.” Id., at § 140/11(j).

Plaintiff Specific Allegations

19. Plaintiff submitted its first FOIA request on May 29, 2024.

20. The May 29, 2024 Request sought:

1. The authority for Dive team to bill individuals.
2. All invoices and communications from Dive team and the insurance company in file I have attached.
3. All communications and reports of individuals on the file I have attached with Dive team.

May 29, 2024 E-Mail (the “May 29 Request”), attached hereto as Exhibit A.

21. Under Section 3(d) of FOIA, Defendants were obligated to validly respond to the May 29 Request by or before June 5, 2024.

22. Defendants never responded to Plaintiff’s May 29 Request.

23. On July 11, 2024, Plaintiff submitted his second FOIA request.

24. Plaintiff's July 11 Request again sought:
 1. The authority for Dive team to bill individuals.
 2. All invoices and communications from Dive team and the insurance company in file I have attached.
 3. All communications and reports of individuals on the file I have attached with Dive team.
 4. 2017 roster and current roster.

July 11, 2024 E-Mail (the "July 11 Request"), attached hereto as Exhibit B.

25. Under Section 3(d) of FOIA, Defendants were obligated to validly respond to the July 11 Request by or before July 18, 2024.

26. Defendants never responded to Plaintiff's July 11 Request.

27. On August 16, 2024, Plaintiff re-forwarded his request to Defendants hoping to receive a response to his July 11 Request but, Defendants ignored his follow-up and did not respond.

28. On July 11, 2024, Plaintiff submitted an additional FOIA request.

29. Plaintiff's Second July 11 Request sought "information on the fundraiser for the Five Team.- (*sic*) in July 2024" and specifically sought:

1. Proof the money was given to Shelby County Treasurer
2. The amount and when it was given to Treasurer[.]

Second July 11, 2024 E-Mail (the "July 11b Request"), attached hereto as Exhibit C.

30. Under Section 3(d) of FOIA, Defendants were obligated to validly respond to the July 11 Request by or before July 18, 2024

31. Defendants never responded to Plaintiff's July 11b Request.

32. On September 3, 2024, Plaintiff submitted an additional FOIA request.

33. Plaintiff's September 3 Request sought "requesting all email addresses used for Shelby County Department Heads, and elected officials to include Rescue/Dive Team." September 3, 2024 E-Mail, attached hereto as Exhibit D.

34. Defendant Shelby County responded to Plaintiff's September 3 Request on September 4, 2024.

35. Defendants have been receiving Plaintiffs' Requests, as evinced by the response to the September 3, 2024 Request.

36. Plaintiff submitted its final FOIA request on November 7, 2024.

37. The November 7, 2024 Request sought: "all run reports(call reports or dispatch reports) for the month of July 2024."

November 7, 2024 E-Mail (the "November 7 Request"), attached hereto as Exhibit D.

38. Under Section 3(d) of FOIA, Defendants were obligated to validly respond to the May 29 Request by or before November 14, 2024.

39. Defendants never responded to Plaintiff's May 29 Request.

40. The Dive Team and its officers have failed to satisfy their other obligations under FOIA, as articulated in Section 3.5(a), for Plaintiff's FOIA Requests.

41. Defendants' decision to ignore their legal obligations makes a mockery of the requirements of FOIA, for a transparent government. These counts follow.

Count I
Failure to Produce Demanded Records

42. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

43. Defendants Shelby County and the Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

44. The records requested by Plaintiff in the May 29 Request, are non-exempt public records and are subject to FOIA's inspection requirements.

45. FOIA requires Defendants to respond to a records request within five (5) days of receipt or request an additional five (5) days to respond.

46. Defendants failed to either respond to Plaintiff's May 29 Request or request additional time to respond to the same within the statutorily prescribed time period, in violation of FOIA's Section 3(d).

47. Defendants violated FOIA when it failed to produce the requested records within the statutory time period or any time thereafter; and otherwise failed to respond to Plaintiff's Request.

Count II
Willful and Intentional Violation of FOIA

48. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

49. Defendants Shelby County and Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

50. The records requested by Plaintiff's May 29 Request are non-exempt public records and are subject to FOIA's inspection requirements.

51. Upon information and belief, Defendants failed to satisfy any of FOIA's attendant requirements, including: (1) computing the response deadline; (2) creating and maintaining an electronic or paper record of the request until the request is complied with or denied; or (3) creating a file for the retention of the request, response, and all communications concerning the same, in violation of FOIA's Section 3.5(a).

52. Defendants Shelby County and Shelby County Dive Team willfully, intentionally, and in bad faith failed to comply with four (4) separate requirements of FOIA.

Count III
Failure to Produce Demanded Records

53. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

54. Defendants Shelby County and the Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

55. The records requested by Plaintiff in the July 11 Request, are non-exempt public records and are subject to FOIA's inspection requirements.

56. FOIA requires Defendants to respond to a records request within five (5) days of receipt or request an additional five (5) days to respond.

57. Defendants failed to either respond to Plaintiff's Jul 11 Request or request additional time to respond to the same within the statutorily prescribed time period, in violation of FOIA's Section 3(d).

58. Defendants violated FOIA when it failed to produce the requested records within the statutory time period or any time thereafter; and otherwise failed to respond to Plaintiff's Request.

Count IV
Willful and Intentional Violation of FOIA

59. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

60. Defendants Shelby County and Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

61. The records requested by Plaintiff's July 11 Request are non-exempt public records and are subject to FOIA's inspection requirements.

62. Upon information and belief, Defendants failed to satisfy any of FOIA's attendant requirements, including: (1) computing the response deadline; (2) creating and maintaining an electronic or paper record of the request until the request is complied with or denied; or (3) creating

a file for the retention of the request, response, and all communications concerning the same, in violation of FOIA's Section 3.5(a).

63. Defendants Shelby County and Shelby County Dive Team willfully, intentionally, and in bad faith failed to comply with four (4) separate requirements of FOIA.

Count V
Failure to Produce Demanded Records

64. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

65. Defendants Shelby County and the Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

66. The records requested by Plaintiff in the July 11b Request, are non-exempt public records and are subject to FOIA's inspection requirements.

67. FOIA requires Defendants to respond to a records request within five (5) days of receipt or request an additional five (5) days to respond.

68. Defendants failed to either respond to Plaintiff's July 11b Request or request additional time to respond to the same within the statutorily prescribed time period, in violation of FOIA's Section 3(d).

69. Defendants violated FOIA when it failed to produce the requested records within the statutory time period or any time thereafter; and otherwise failed to respond to Plaintiff's Request.

Count VI
Willful and Intentional Violation of FOIA

70. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

71. Defendants Shelby County and Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

72. The records requested by Plaintiff's July 11b Request are non-exempt public records and are subject to FOIA's inspection requirements.

73. Upon information and belief, Defendants failed to satisfy any of FOIA's attendant requirements, including: (1) computing the response deadline; (2) creating and maintaining an electronic or paper record of the request until the request is complied with or denied; or (3) creating a file for the retention of the request, response, and all communications concerning the same, in violation of FOIA's Section 3.5(a).

74. Defendants Shelby County and Shelby County Dive Team willfully, intentionally, and in bad faith failed to comply with four (4) separate requirements of FOIA.

Count VII
Failure to Produce Demanded Records

75. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

76. Defendants Shelby County and the Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

77. The records requested by Plaintiff in the November 7 Request, are non-exempt public records and are subject to FOIA's inspection requirements.

78. FOIA requires Defendants to respond to a records request within five (5) days of receipt or request an additional five (5) days to respond.

79. Defendants failed to either respond to Plaintiff's November 7 Request or request additional time to respond to the same within the statutorily prescribed time period, in violation of FOIA's Section 3(d).

80. Defendants violated FOIA when it failed to produce the requested records within the statutory time period or any time thereafter; and otherwise failed to respond to Plaintiff's Request.

Count II
Willful and Intentional Violation of FOIA

81. Plaintiff incorporates the above paragraphs by reference as if fully set forth herein.

82. Defendants Shelby County and Shelby County Dive Team are public bodies under Section 2(a) of FOIA.

83. The records requested by Plaintiff's November 7 Request are non-exempt public records and are subject to FOIA's inspection requirements.

84. Upon information and belief, Defendants failed to satisfy any of FOIA's attendant requirements, including: (1) computing the response deadline; (2) creating and maintaining an electronic or paper record of the request until the request is complied with or denied; or (3) creating a file for the retention of the request, response, and all communications concerning the same, in violation of FOIA's Section 3.5(a).

Defendants Shelby County and Shelby County Dive Team willfully, intentionally, and in bad faith failed to comply with four (4) separate requirements of FOIA

Prayer for Relief

Wherefore, Plaintiff Cody Brands, Inc., respectfully requests that the Court find:

a. According to 5 ILCS § 140/11(h), this case be afforded precedence on the Court's docket, except for cases which the Court considers to be of greater import, and assign this matter for hearings and trial at the earliest convenience and otherwise expedited these proceedings;

b. Find that Defendants Shelby County and the Shelby County Dive Team have violated FOIA's Section 3(d) by failing to timely respond to Plaintiff's Requests;

c. Find that Defendants Shelby County and the Shelby County Dive Team have violated FOIA's Section 3.5(a) by failing to:

i. compute its response deadline;

- ii. create or maintain an electronic or paper record of the Request until the request is complied with or denied; and
 - iii. create a file for the retention of the request, response, and all communications concerning the same;
- d. Order Defendants Shelby County and the Shelby County Dive Team to produce all requested records, documents, and information;
- e. Enjoin Defendants Shelby County and the Shelby County Dive Team from withholding non-exempt public records under FOIA;
- f. Order Defendants Shelby County and the Shelby County Dive Team to pay civil penalties of not less than \$2,500 nor more than \$5,000 for each of the above violations of FOIA, pursuant to 5 ILCS § 140/1(j);
- g. Award Plaintiff reasonable attorney's fees and costs, pursuant to 5 ILCS § 140/1(i);
- and
- h. Grant any and all further relief that this Court deems just and proper.

Dated: December 20, 2024

Respectfully Submitted:

By: /s/ Adam Florek

Edward "Coach" Weinhaus, Esq.
Cook County #64450 / ARDC #6333901
Adam Florek - ARDC No: 6320615
LegalSolved, LLC, FOIASolved division
11500 Olive Blvd., Suite 133
Saint Louis, Missouri 63141-7126
Tele: (314) 580-9580
E-mail: eaweinhaus@gmail.com
E-mail: aflorek@florekllc.com

Exhibit A

Adam Florek

Subject: FW: Foia request

----- Forwarded message -----

From: **Cody Brands** [REDACTED]
Date: Wed, May 29, 2024 at 11:51 PM
Subject: Foia request
To: <shcoclerk@shelbycounty-il.gov>

Good evening, I am requesting the following from the Shelby County Dive team.

1. The authority for Dive team to bill individuals.
2. All invoices and communications from Dive team and the insurance company in file I have attached.
3. All communications and reports of individuals on the file I have attached with Dive team.

Thanks Cody Brands

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT.

CAREFULLY DETACH TO RISK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS

CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM

SCC * 006656
Safeco Insurance Companies
P.O. Box 461
Saint Louis, MO 63166-0461

Safeco Insurance
A Liberty Mutual Company

The Northern Trust Company
Chicago, IL
Payable through, Clabrook Terrace, IL

15021523
CHECK DATE 7/20/2017
JUN 15, 2017

Claim No. 13A171210614

Voucher No. 1700815

*****600.00

VOID IF NOT PRESENTED WITHIN SIX MONTHS OF ISSUE DATE OF CHECK

PAY SIX HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

TWO SIGNATURES REQUIRED IF AMOUNT EXCEEDS \$500.00

Safeco Insurance
A Liberty Mutual Company

17228569

ISSUE DATE MAY 14, 2019
CLAIMS ACCOUNTING
P.O. BOX 461
ST. LOUIS, MO 63166-0461

CLAIM NO. 989545656039
ACS REF NO. 13A171210614
POLICY NO. 204691375

LOSS DATE 05-01-17

ADJUSTER:
LATORIA SMOOTE
PHONE NO: 1-800-332-3226

AGENT: 25-0549
SIEGERT-LEES INS SERVICES LLC

SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

COVERAGES PAID THIS CHECK:

600.00 AUTO MED MEDICAL EXPENSES

*****600.00 TOTAL PAID THIS CHECK
INSURED: CONAWAY HEATHER CONAWAY, SHAWN
ON BEHALF OF: CONAWAY, SHAWN
IN PAYMENT OF: MEDICAL SERVICES

POST-NR

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT.

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS

SCC * 000978
Safeco Insurance Companies
P.O. Box 461
Saint Louis, MO 63166-0461

Safeco Insurance
A Liberty Mutual Company

The Northern Trust Company
Chicago, IL
Payable through, Clabrook Terrace, IL

17228569
CHECK DATE 7/20/2017
MAY 14, 2019

Claim No. 13A171210614

Voucher No. 1340113

*****600.00

VOID IF NOT PRESENTED WITHIN SIX MONTHS OF ISSUE DATE OF CHECK

PAY SIX HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

TWO SIGNATURES REQUIRED IF AMOUNT EXCEEDS \$500.00



ENBRIDGE (U.S.) INC.
1100 Louisiana Street
Suite 3300
Houston, TX 77002

BANK OF AMERICA NA
1315 LAKE COOK ROAD
NORTHBROOK, IL 60062
70-2328/719

Ch# 3020003859

DATE 2016 10 21
TX 3096 303

PAY *****One Thousand Dollars And 00 Cents \$ *****1,000.00

USD Funds

TO THE ORDER OF SHELBY COUNTY
DIVE TEAM
PO BOX 326
SHELBYVILLE, IL 62565-0326
United States

Man Mahi
Stephen Nijel

Exhibit B

Adam Florek

Subject: FW: Foia request

On Thu, Jul 11, 2024 at 12:30 PM Cody Brands <[REDACTED]> wrote:

Good afternoon, I am requesting the following from the Shelby County Dive team.

1. The authority for Dive team to bill individuals.
2. All invoices and communications from Dive team and the insurance company in file I have attached.
3. All communications and reports of individuals on the file I have attached with Dive team.
4. 2017 roster and current roster

Thanks Cody Brands



Dive Donation receipt...



Note

* Unless otherwise noted, all bill review reductions are due to charges exceeding amounts that would appear reasonable for the provider's geographical region.

IF PAYMENT IS DUE, CHECK WILL BE SENT UNDER SEPARATE COVER. APPEALS MUST BE SUBMITTED IN WRITING WITH COPY OF THE EOR AND SUPPORTING DOCUMENTATION TO

P.O. BOX 515097 LOS ANGELES, CA 90051, FOR QUESTIONS CALL, (800) 245-1700, EXT. 7240286

CPT Copyright 1995-2016 American Medical Association. All rights reserved.

Safeco Insurance
A Liberty Mutual Company

1502152

ISSUE DATE JUN 19, 2017
CLAIMS ACCOUNTING
P.O. BOX 461
ST. LOUIS, MO 63166-0461

CLAIM NO. 989543656039
ACS REF NO. 13A171210614
POLICY NO. Z04691375

LOSS DATE 05-01-17

ADJUSTER:
LATORIA SMOOTE
PHONE NO: 1-800-332-3226

AGENT: 25-0549
SIEGERT-LEES INS SERVICES LLC

PAYMENT PERIOD:
05-01-17 TO 05-01-17

SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

COVERAGES PAID THIS CHECK:

600.00 AUTO MED MEDICAL EXPENSES

****600.00 TOTAL PAID THIS CHECK
INSURED: CONAWAY HEATHER CONAWAY, SHAWN
ON BEHALF OF: CONAWAY, SHAWN
IN PAYMENT OF: MEDICAL SERVICES

THIS CHECK IS IN PAYMENT OF MEDICAL SERVICES.
FOR INFORMATION CONCERNING THIS PAYMENT PLEASE REFER TO THE
EXPLANATION OF REVIEW (EOR) STATEMENT MAILED UNDER SEPARATE COVER.
APPEALS MUST BE SUBMITTED IN WRITING WITH COPY OF THE EOR, BILL
AND SUPPORTING DOCUMENTATION TO:

SAFECO CLAIMS, P.O. BOX 515097, LOS ANGELES, CA 90051-5099
(800) 245-1700, EXT. 593-2044

postnet

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

SCC # 006656
Safeco Insurance Companies
P.O. Box 461
Saint Louis, MO 63166-0461

Safeco Insurance
A Liberty Mutual Company

The Liberty Mutual Company
Chicago, IL
Payable Through Dukedom Business, Inc.

1502152
CHECK DATE JUN 19, 2017

Claim No. 13A171210614

Voucher No. 1700815

***\$600.00

VOID IF NOT PRESENTED WITHIN SIX MONTHS OF ISSUE DATE OF CHECK

PAY SIX HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

TWO SIGNATURES REQUIRED IF AMOUNT EXCEEDS \$5000

Safeco Insurance
A Liberty Mutual Company

17228569

ISSUE DATE MAY 14, 2019
CLAIMS ACCOUNTING
P.O. BOX 461
ST. LOUIS, MO 63166-0461

CLAIM NO. 989543656039
ACS REF NO. 13A171210614
POLICY NO. Z04691375

LOSS DATE 05-01-17

ADJUSTER:
LATORIA SMOOTE
PHONE NO: 1-800-332-3226

AGENT: 25-0549
SIEGERT-LEES INS SERVICES LLC

SHELBY COUNTY DIVE TEAM
PO BOX 326
SHELBYVILLE IL 62565-0326

Foia request-second attempt

Cody Brands <[REDACTED]>

Fri, Aug 16 at 11:51 AM

To: <shelbydive@shelbycounty-il.com>, States Attorney <statesattorney@shelbycounty-il.gov>

On Thu, Jul 11, 2024 at 12:30 PM Cody Brands <[REDACTED]> wrote:

Good afternoon, I am requesting the following from the Shelby County Dive team.

1. The authority for Dive team to bill individuals.
2. All invoices and communications from Dive team and the insurance company in file I have attached.
3. All communications and reports of individuals on the file I have attached with Dive team.
4. 2017 roster and current roster

Thanks Cody Brands



Exhibit C



Cody Brands <[REDACTED]>

Foia Request

Cody Brands [REDACTED]

Thu, Jul 11 at 12:37 PM

To: <shcotre@shelbycounty-il.gov>, <shelbydive@shelbycounty-il.com>

I am requesting at information on the fundraiser for the Dive Team.

1. Proof the money was given to Shelby County Treasurer
2. The amount and when it was given to Treasurer

Thanks Cody



Cody Brands <[REDACTED]>

Foia Request-second attempt

Cody Brands <[REDACTED]>

Fri, Aug 16 at 11:53 AM

To: <shcotre@shelbycounty-il.gov>, <shelbydive@shelbycounty-il.com>, States Attorney <statesattorney@shelbycounty-il.gov>

I have received from Treasure. Dive has failed to respond

On Thu, Jul 11, 2024 at 12:37 PM Cody Brands <[REDACTED]> wrote:

I am requesting at information on the fundraiser for the Dive Team.-in July 2024

1. Proof the money was given to Shelby County Treasurer
2. The amount and when it was given to Treasurer

Thanks Cody

Exhibit D



Cody Brands <[REDACTED]>

Foia request

Cody Brands <[REDACTED]>

Thu, Nov 7 at 11:11 PM

To: <shelbydive@shelbycounty-il.com>, "Austin Pritchard" <shelbycountydiveteam@gmail.com>
<shelbycountydiveteam@gmail.com>

Good evening. I am requesting all run reports(call reports or dispatch reports) for the month of July 2024. Thank you, Cody Brands