



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

KWAME RAOUL  
ATTORNEY GENERAL

January 21, 2026

**PUBLIC ACCESS OPINION 26-001**  
**(Request for Review 2025 PAC 90575)**

OPEN MEETINGS ACT:  
Rules for Public Comment;  
Opportunity to Address  
Public Officials

Ms. Francine Anderson  
[REDACTED]  
Sauk Village, Illinois 60411

The Honorable Marva Campbell-Pruitt  
Mayor  
Village of Sauk Village  
21801 Torrence Avenue  
Sauk Village, Illinois 60411

Dear Ms. Anderson and Ms. Campbell-Pruitt:

This binding opinion is issued pursuant to section 3.5(e) of the Open Meetings Act (OMA) (5 ILCS 120/3.5(e) (West 2024)). For the reasons discussed below, this office concludes that the Village of Sauk Village (Village) Board of Trustees (Board) violated OMA by improperly limiting and interfering with Ms. Francine Anderson's opportunity to address public officials during the Board's November 4, 2025, Committee of the Whole meeting.

**BACKGROUND**

On November 10, 2025, Ms. Anderson submitted a Request for Review alleging that the Board violated section 2.06(g) of OMA (5 ILCS 120/2.06(g) (West 2024)) during its

500 South 2nd Street  
Springfield, Illinois 62701  
(217) 782-1090 • Fax: (217) 782-7046

115 South LaSalle Street  
Chicago, Illinois 60603  
(312) 814-3000 • Fax: (312) 814-3806

1745 Innovation Drive, Suite C  
Carbondale, Illinois 62903  
(618) 529-6400 • Fax: (618) 529-6416

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November 4, 2025, meeting by interrupting her public comment.<sup>1</sup> Ms. Anderson alleged that the Mayor interrupted her to state that she could not say the names of Village trustees, and then turned off the audio system before removing the microphone from the lectern.<sup>2</sup> Ms. Anderson further alleged that the Mayor asked the Village's Police Chief to remove her from the meeting, and stated that she was unable to complete her public comment without interference from the Mayor even though she was permitted to remain in the meeting room.<sup>3</sup> Ms. Anderson's submission included an internet link to a video of her public comment.<sup>4</sup>

On November 19, 2025, the Public Access Bureau e-mailed<sup>5</sup> a copy of the Request for Review to the Board together with a letter asking the Board to provide a written response to Ms. Anderson's allegation, a copy of the Board's rules regarding public comment, and the agenda, minutes, and any recordings of the open session portion of the November 4, 2025, meeting.<sup>6</sup> On December 1, 2025, counsel for the Board e-mailed this office a written response, a copy of the meeting agenda, and a copy of the Board's rules on public comment.<sup>7</sup> The response stated that the Board did not possess any "official" audio or video recordings of the meeting, and that the meeting minutes were still being drafted.<sup>8</sup> On December 1, 2025, the

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<sup>1</sup>E-mail from Francine Anderson to Public Access Counselor, Office of the Attorney General (November 10, 2025).

<sup>2</sup>E-mail from Francine Anderson to Public Access Counselor, Office of the Attorney General (November 10, 2025), at 1.

<sup>3</sup>E-mail from Francine Anderson to Public Access Counselor, Office of the Attorney General (November 10, 2025), at 1.

<sup>4</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>.

<sup>5</sup>E-mail from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General, to [Marva] Campbell-Pruitt, [Mayor, Village of Sauk Village] (November 19, 2025).

<sup>6</sup>Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to the Honorable Marva Campbell-Pruitt, Mayor, Village of Sauk Village (November 19, 2025), at 1-2.

<sup>7</sup>E-mail from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (December 1, 2025).

<sup>8</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 1.

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Public Access Bureau forwarded a copy of the Board's written response to Ms. Anderson and notified her of her opportunity to reply.<sup>9</sup> She submitted a reply on December 8, 2025.<sup>10</sup>

On January 7, 2026, this office extended the time for issuing a binding opinion by 21 business days, to February 10, 2026, pursuant to section 3.5(e) of OMA.<sup>11</sup>

### ANALYSIS

Section 2.06(g) of OMA provides that "[a]ny person shall be permitted an opportunity to address public officials under the rules established and recorded by the public body." This provision "generally precludes a public body from imposing restrictions on public comment that are not set out in its established and recorded rules." Ill. Att'y Gen. Pub. Acc. Op. No. 23-013, issued September 13, 2023, at 3; *see also* Ill. Att'y Gen. Pub. Acc. Op. No. 14-009, issued September 4, 2014, at 7 (public body "violated section 2.06(g) of OMA by placing a condition on the making of a public comment that is not part of its established and recorded rules."); Ill. Att'y Gen. Pub. Acc. Op. No. 19-002, issued January 9, 2019, at 7 (public body "violated section 2.06(g) of OMA by imposing an unestablished and unrecorded rule limiting public comment to 15 minutes[.]").

This office has reviewed the video recording to which Ms. Anderson provided an internet link. The recording shows that at the beginning of her public comment, Ms. Anderson stated that she was glad that a specific trustee, whom she identified by name, had asked a particular question; this did not appear to cause a disruption in the audience, but the Mayor interrupted Ms. Anderson to say, "please do not call names."<sup>12</sup> A short time later, Ms. Anderson stated the names of three trustees in order to offer her congratulations to those trustees for organizing a holiday event.<sup>13</sup> Immediately before Ms. Anderson completed stating the name of the first trustee, the Mayor again interjected, "please do not call names."<sup>14</sup> Ms. Anderson

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<sup>9</sup>Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General, to Francine Anderson (December 1, 2025).

<sup>10</sup>Letter from Francine Anderson, Sauk Village Resident, to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 8, 2025).

<sup>11</sup>Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Francine Anderson and Arlene F. Cabana, Odelson, Murphey, Frazier, & McGrath, Ltd. (January 7, 2026).

<sup>12</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 0:12-0:22.

<sup>13</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 1:14-1:21.

<sup>14</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 1:17-1:18.

proceeded to name the trustees and continued her public comment, objecting to the Mayor trying to restrict her from stating the names of trustees.<sup>15</sup> The Mayor unplugged the public comment audio system so that no sound came through the speakers as Ms. Anderson continued to speak into the microphone, and then approached the lectern and removed the microphone.<sup>16</sup> As Ms. Anderson objected more vehemently, the Mayor stood close to the lectern and stated, "her time is up," even though Ms. Anderson had only spoken for approximately two of the allotted three minutes.<sup>17</sup> The Mayor then said to the Village's Police Chief, "sir, can you help her? Help her."<sup>18</sup> The Police Chief approached the lectern but allowed Ms. Anderson to continue speaking; the Police Chief and the Mayor stood several feet from Ms. Anderson for the remainder of her public comment.<sup>19</sup>

The Board does not dispute that the recording provided by Ms. Anderson accurately depicts her addressing the Board at the November 4, 2025, meeting. The Board's response to this office acknowledged that the Mayor asked Ms. Anderson not to refer to trustees by their names and that the Mayor removed the microphone from the lectern when Ms. Anderson did not comply with that request.<sup>20</sup> The Board's response cited two sections of the Village's Municipal Code (Code) as relevant to public comment.<sup>21</sup> First, section 2-80 of the Code<sup>22</sup> provides that a member of the public may address the Board for three minutes, and that if the speaker "fails to yield the floor after the expiration of their allotted time, the Mayor may call for a recess or direct a public safety officer to ask the individual to yield the podium." The Board's response stated that this rule "exists to ensure orderly and efficient public meetings."<sup>23</sup> Second,

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<sup>15</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 1:19-1:45.

<sup>16</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 1:47-2:01.

<sup>17</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 2:02-2:10.

<sup>18</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 2:15-2:16.

<sup>19</sup>Village of Sauk Village Board of Trustees, *November 4, 2025, Committee of the Whole Meeting*, YouTube, (November 4, 2025), <https://www.youtube.com/watch?v=zs1ObygXfIM>, at 2:17-2:57.

<sup>20</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 2-3.

<sup>21</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 3.

<sup>22</sup>Village of Sauk Village Municipal Code, § 2-80 (amended February 23, 2016).



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section 2-82 of the Code<sup>24</sup> provides that "[w]henver a question of parliamentary law not fully covered by this section shall arise, the same shall be decided in accordance with the rules of parliamentary law set forth in Robert's Rules of Order, newly revised." The Board cited to four provisions in Robert's Rules of Order that it contended were relevant to the order, decorum, or procedure of the Village's meetings.<sup>25</sup>

In its response to this office, the Board contended:

The Mayor's verbal interjection was not intended as a categorical prohibition on naming Trustees, but rather was intended to maintain decorum, avoid direct debate involving the presiding officer, Trustees and speakers, and to ensure compliance with the rules requiring that comments be directed to the Board as a whole, consistent with Robert's Rules. Ms. Anderson has attended meetings in the past in which the Mayor has asked all public commenters not to state individual trustee names to prevent disruptions.<sup>[26]</sup>

The agenda of the November 4, 2025, meeting states that "[a]ll questions and comments must be directed at the mayor."<sup>27</sup> That agenda provision does not state that members of the public must direct comments "to the Board as a whole," and such a requirement does not appear in the established and recorded public comment rules in the Village Code or the provisions of Robert's Rules of Order that the Board cited in its response. Two of the Robert's Rules of Order provisions pertain to members of the *body* that holds meetings. Section 43:22 of Robert's Rules of Order states that "[m]embers of an assembly cannot address one another directly, but must address all remarks through the chair." (Emphasis added).<sup>28</sup> Section 61:11, entitled "Calling a member to order[.]" outlines the procedure for a presiding officer to "call [a]

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<sup>23</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 2.

<sup>24</sup>Village of Sauk Village Municipal Code, § 2-82 (adopted June 25, 2013).

<sup>25</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 2.

<sup>26</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 3.

<sup>27</sup>Village of Sauk Village Board of Trustees, Committee of the Whole Meeting, Agenda Item 3, Public Comments (November 4, 2025).

<sup>28</sup>Robert's Rules of Order Newly Revised § 43:22 (12th ed. 2020).

member to order," when, for instance, "a member repeatedly questions the motives of other members whom he mentions by name[.]"<sup>29</sup> Both of those sections clearly apply to members of a body during debate rather than members of the public providing public comment.

The Board also cited section 47:7 of Robert's Rules of Order, which provides that the presiding officer has the duty to "enforce the rules relating to debate and those relating to order and decorum within the assembly[.]"<sup>30</sup> In its response to this office, the Board claimed that that the Board has experienced "multiple instances during public comment where naming individual Trustees has resulted in audience unrest, elevated tensions, and interruption of the meeting[.]"<sup>31</sup> and that "[t]his history of prior disruptions, including multiple instances involving Ms. Anderson's own disruptive behavior, heightened the Mayor's obligation to prevent back-and-forth exchanges, personal disputes, or circumstances likely to lead to disruption."<sup>32</sup> The response did not elaborate on these claims or provide factual or contextual support for the Board's assertion that the Mayor's actions at the November 4, 2025, meeting "were intended solely to maintain order[.]"<sup>33</sup> In her reply, Ms. Anderson stated that she simply was "attempting to congratulate a few elected officials on a job well done[.]"<sup>34</sup> adding that she also had a right to criticize elected officials if that had been her intent.

Finally, section 47:7 of Robert's Rules of Order is a general provision concerning the duty of the presiding officer to maintain order. Stating the names of Board members while addressing the Board is not an inherently disruptive action that would be obviously prohibited by a general rule authorizing a presiding officer to take action to maintain order. Accordingly, neither that provision nor any of the other provisions of Robert's Rules of Order cited by the Board the authorized the Board to interrupt and interfere with Ms. Anderson's public comment because she stated the names of Board members.

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<sup>29</sup>Robert's Rules of Order Newly Revised § 61:11 (12th ed. 2020).

<sup>30</sup>Robert's Rules of Order Newly Revised § 47:7 (12th ed. 2020).

<sup>31</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 3.

<sup>32</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 3.

<sup>33</sup>Letter from Arlene F. Cabana, Senior Counsel, Odelson, Murphey, Frazier & McGrath, Ltd., to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 1, 2025), at 3.

<sup>34</sup>Letter from Francine Anderson to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (December 8, 2025), at [3].

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Even in the absence of a relevant established and recorded a rule, a public body would not necessarily violate section 2.06(g) by terminating certain inflammatory comments—such as those that cause a disruption because the content is profane or insulting. *See* Ill. Att'y Gen. Pub. Acc. Op. No. 19-002, at 6-7 ("Certainly, a public body has inherent authority to conduct its meeting in an efficient manner[.]"). However, Ms. Anderson did not make inflammatory comments that disrupted the meeting. Instead, the Mayor instigated a conflict with Ms. Anderson by objecting to her using the names of trustees, unplugging the audio system and removing the microphone, and stating that Ms. Anderson's time to address the Board had expired even though she had not used the full three minutes to which she was entitled under the Board's public comment rules. Although Ms. Anderson's objections grew louder as the conflict escalated, any resulting disruption to the order and decorum of the meeting was attributable to the Mayor improperly interfering with Ms. Anderson's statutory right to address the Board. Because Ms. Anderson did not disrupt the order and decorum of the meeting, this office concludes that the Board violated section 2.06(g) of OMA at the November 4, 2025, meeting.

Moreover, the language of section 2.06(g) of OMA that guarantees "an opportunity to address public officials" necessarily implies the right to state the names of public officials so it is clear to whom the comments are directed. This office also notes that established and recorded rules for public comment at meetings must tend to accommodate, rather than unreasonably restrict, the right to address public officials. Ill. Att'y Gen. Pub. Acc. Op. No. 14-012, issued September 30, 2014, at 6. It is unclear how that standard could be satisfied by an established and recorded rule that prohibits speakers from stating the names of the members of the public body that they address. Section 2.06(g) of OMA does not permit a public body to enforce public comment rules that impose unconstitutional restrictions on speech during public meetings. *See* Ill. Att'y Gen. Pub. Acc. Op. No. 19-009, issued October 1, 2019, at 5. An open meeting of a public body typically constitutes a designated public forum where the first amendment to the United States Constitution ordinarily permits only "reasonable time, place and manner restrictions on public participation" which are content-neutral and "serve a significant government interest[.]" *I.A. Rana Enterprises, Inc. v. City of Aurora*, 630 F. Supp. 2d 912, 922-23 (N.D. Ill. 2009), quoted in Ill. Att'y Gen. Pub. Acc. Op. No. 14-009, at 4. To the extent that a prohibition on the use of names of public officials and employees is intended to shield public officials from criticism, courts have deemed restrictions on such criticism during open meetings to be unconstitutional. *See e.g., Leventhal v. Vista Unified School District*, 973 F. Supp 951, 954, 960-61 (S.D. Cal. 1997) (concluding that a school district violated the first amendment to the United States Constitution by enforcing a content-based public comment rule that prohibited

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speakers from making complaints against individual public employees unless the employee consented).<sup>35</sup>

## FINDINGS AND CONCLUSIONS

After full examination and giving due consideration to the information submitted, the Public Access Counselor's review, and the applicable law, the Attorney General finds that:

- 1) On November 10, 2025, Ms. Francine Anderson submitted a Request for Review alleging that during its November 4, 2025, Committee of the Whole meeting, the Village of Sauk Village Board of Trustees improperly restricted her right to public comment pursuant to section 2.06(g) of OMA. Ms. Anderson's Request for Review was timely filed and otherwise complies with the requirements of section 3.5(a) of OMA.
- 2) On November 19, 2025, the Public Access Bureau sent a copy of the Request for Review to the Board. The Public Access Bureau also sent the Board a letter requesting copies of the Board's public comment rules, the agenda, minutes, and any recordings of the Board's November 4, 2025, meeting, and a written response to the allegations in Ms. Anderson's Request for Review.
- 3) On December 1, 2025, the Board provided this office with a written response to the allegations, along with a copy of the meeting agenda, the Board's public comment rules, and select portions of Robert's Rules of Order.
- 4) On that same date, the Public Access Bureau forwarded a copy of the Board's written answer to Ms. Anderson and notified her of her opportunity to reply. She replied on December 8, 2025.
- 5) On January 7, 2026, this office extended the time for issuing a binding opinion by 21 business days, to February 10, 2026, pursuant to section 3.5(e) of OMA. Accordingly, the Attorney General may properly issue a binding opinion with respect to this matter.
- 6) Section 2.06(g) of OMA provides that "[a]ny person shall be permitted an opportunity to address public officials under the rules established and recorded by the public body."

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<sup>35</sup>Broad limitations on speech that, on their face, do not restrict speakers from expressing a particular viewpoint may still constitute impermissible content-based restrictions if they are applied in a manner that stifles criticism of public officials. *See Moore v. Asbury Park Board of Education*, 2005 U.S. Dist. Lexis 18372, at \*33-35 (N.J. Dist. 2005) (holding that a rule prohibiting comments that are "personally directed" was an unconstitutional restraint on speech); *see also Turner Broadcasting System Inc., v. FCC*, 512 U.S. 622, 645 (1994) ("even a regulation neutral on its face may be content-based if its manifest purpose is to regulate speech because of the message it conveys.").



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7) During the Board's November 4, 2025, meeting, the Mayor interrupted Ms. Anderson's public comment to tell her not to state the names of trustees.

8) When Ms. Anderson proceeded to offer her congratulations to individual trustees by name, the Mayor turned off the public comment audio system, removed the microphone from the lectern, stated that Ms. Anderson's time was up, and called the Police Chief up to the lectern.

9) The Board has not established and recorded a rule that prohibits speakers from addressing individual trustees by name. Even if it had, public comment rules must tend to accommodate, rather than unreasonably restrict, the right to address public officials. A rule that prohibits speakers from stating the names of trustees to which they direct comments would be incompatible with that standard and the language of section 2.06(g) of OMA that guarantees members of the public "an opportunity to address public officials[.]"

10) Ms. Anderson did not disrupt the meeting by stating the names of trustees. Therefore, the interruption and interference with Ms. Anderson's public comment was not a valid exercise of the Board's inherent authority to run an orderly meeting.

11) Accordingly, the Attorney General concludes that the Board violated section 2.06(g) of OMA by impermissibly restricting Ms. Anderson from addressing public officials during the Board's November 4, 2025, Committee of the Whole meeting.

In accordance with these findings of fact and conclusions of law, the Board is directed to take immediate and appropriate action to comply with this opinion by taking measures to ensure all future meetings comply with the requirements of OMA. In particular, the Board generally may only restrict public comment in accordance with established and recorded rules that are designed to accommodate the public's statutory right to address the Board within an orderly and efficient meeting.

This opinion shall be considered a final decision of an administrative agency for the purposes of administrative review under the Administrative Review Law. 735 ILCS 5/3-101 *et seq.* (West 2024). An aggrieved party may obtain judicial review of the decision by filing a complaint for administrative review with the Circuit Court of Cook County or Sangamon County

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within 35 days of the date of this decision naming the Attorney General of Illinois and Ms. Francine Anderson as defendants. *See* 5 ILCS 120/7.5 (West 2024).

Sincerely,

KWAME RAOUL  
ATTORNEY GENERAL

By:



R. Douglas Rees  
Chief Deputy Attorney General

cc: Ms. Arlene F. Cabana  
Odelson, Murphy, Frazier & McGrath, Ltd.  
3318 West 95th Street  
Evergreen Park, Illinois 60805

**CERTIFICATE OF SERVICE**

Steve Silverman, Deputy Division Chief, Public Access & Opinions Division, Chicago, hereby certifies that he has served a copy of the foregoing Binding Opinion (Public Access Opinion 26-001) upon:

Ms. Francine Anderson

[REDACTED]

Sauk Village, Illinois 60411  
Frana216@yahoo.com

The Honorable Marva Campbell-Pruitt  
Mayor  
Village of Sauk Village  
21801 Torrence Avenue  
Sauk Village, Illinois 60411  
Mccampbell-pruitt@saukvillage.org

Ms. Arlene F. Cabana  
Odelson, Murphy, Frazier & McGrath, Ltd.  
3318 West 95th Street  
Evergreen Park, Illinois 60805  
acabana@omfmlaw.com

by causing a true copy thereof to be sent electronically to the addresses as listed above and by causing to be mailed a true copy thereof in correctly addressed, prepaid envelopes to be deposited in the United States mail at Chicago, Illinois on January 21, 2026.



Steve Silverman  
Deputy Division Chief

Steve Silverman  
Deputy Division Chief  
Public Access & Opinions Division, Chicago  
Office of the Attorney General  
115 South LaSalle Street  
Chicago, Illinois 60603  
(312) 814-6756