



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

February 19, 2026

Via electronic mail
Ms. Sequoia Williams
[REDACTED]

Via electronic mail
Mr. Anthony Ruelli
Chief Financial Officer
Country Club Hills School District 160
4411 West 185th Street
Country Club Hills, Illinois 60478
anthony.ruelli@cch160.org

RE: FOIA Request for Review – 2025 PAC 86894

Dear Ms. Williams and Mr. Ruelli:

This determination is issued pursuant to section 9.5(f) of the Freedom of Information Act (FOIA) (5 ILCS 140/9.5(f) (West 2024), as amended by Public Act 104-438, effective January 1, 2026).

On May 5, 2025, Ms. Sequoia Williams submitted a FOIA request to Country Club Hills School District 160 (District) seeking copies of "records concerning any school district-owned vehicles that have been sold, auctioned, or otherwise disposed of" between January 1, 2023, and May 3, 2025, including records describing the vehicles, the sale price, the purchase agreements, and vehicle transfer documents.¹ The request also sought any board meeting minutes and agendas discussing "the sale or transfer of district-owned vehicles" or that reflected the "intent for any employee and/or board member to purchase and recuse themselves from any related votes or discussions."² On May 19, 2025, after extending its time to respond to

¹E-mail from Sequoia Williams to [Country Club Hills School District 160] (May 5, 2025).

²E-mail from Sequoia Williams to [Country Club Hills School District 160] (May 5, 2025).

Ms. Williams' request pursuant to section 3(e) of FOIA,³ the District advised Ms. Williams that it was still in the process of locating responsive records and requested an extension of five additional business days to respond. Ms. Williams did not agree to the additional extension. On the same day, the District provided one redacted record—a vehicle title—to Ms. Williams and indicated that it was the only record the District had located as of that date. The same day, Ms. Williams submitted the above-referenced Request for Review contesting the completeness of the response.

On May 29, 2025, this office sent a copy of the Request for Review to the District and asked it to clarify whether the District possessed additional responsive records that had not yet been provided to Ms. Williams, and to provide a detailed explanation of its search for responsive records by specifying which recordkeeping systems were searched, how they were searched, and the specific departments and individuals who were consulted as part of the search. On June 9, 2025, the District provided its written response to this office and to Ms. Williams. In addition to describing its search measures, the District indicated that the remaining responsive records had been located and were being provided to Ms. Williams along with the response. On June 10, 2025, Ms. Williams submitted a reply to the District's response. On the same day, this office also forwarded a copy of the District's response to Ms. Williams; she did not submit any additional reply.

DETERMINATION

FOIA provides that "[a]ll records in the custody or possession of a public body are presumed to be open to inspection or copying." 5 ILCS 140/1.2 (West 2024). The adequacy of a public body's search for responsive records is judged by a standard of reasonableness and depends upon the particular facts of the case. *Better Government Ass'n v. City of Chicago*, 2020 IL App (1st) 190038, ¶ 31. "[T]he adequacy of a FOIA search is generally determined not by the fruits of the search, but by the appropriateness of the methods used to carry out the search." *Iturralde v. Comptroller of Currency*, 315 F.3d 311, 315 (D.C. Cir. 2003). Conferring with the public employees and officials who would be expected to have knowledge of any responsive records may satisfy a public body's duty to perform a reasonable search if, under the circumstances, this method of searching "was reasonably calculated to discover the requested documents." *Better Government Ass'n*, 2020 IL App (1st) 190038, ¶ 31 (quoting *Maynard v. Central Intelligence Agency*, 986 F.2d 547, 559 (1st Cir. 1993)). "At all times the burden is on the [public body] to establish the adequacy of its search." *Rugiero v. U.S. Department of Justice*, 257 F.3d 534, 547 (6th Cir. 2001).

In its response to this office, the District stated that the FOIA Officer worked with central office staff to physically locate the records that were provided to Ms. Williams, and that the FOIA Officer asked the Director of Technology to conduct an e-mail search for correspondence responsive to the request. The District also explained that its FOIA Officer, who

³5 ILCS 140/3(e) (West 2024).

was also a consultant in its Business/Finance Department, e-mailed all Board of Education members, the Director of Technology, a business office employee, the District's Superintendent, the Superintendent's Executive Assistant, the Assistant Superintendent, and the Director of Student Services, directing them to provide any responsive records to him. However, the District did not explain if any of these individuals responded to that e-mail or otherwise confirmed that they had conducted a search and possessed no responsive records.

In her reply, Ms. Williams contended that the FOIA response should have included records such as a bill of sale, change of registration or title, and/or invoices or transactional records, as well as Board of Education meeting minutes reflecting the approval of the sale of the vehicle. Ms. Williams also referenced provisions of the Illinois School Code (105 ILCS 5-1-1 (West 2024)) and other Illinois statutes, for the assertion that there are procedural requirements that typically result in certain records being generated before a school district's property may be sold or disposed of.

It is unclear whether the records referenced in Ms. Williams' reply were generated in connection with the sale of any District vehicles, and it is beyond our authority to determine whether they should have been pursuant to statutes such as the School Code.⁴ The District, however, has not provided a sufficient explanation to demonstrate that its search was reasonably calculated to locate all responsive records that may exist. The District did not, for example, identify the keywords that were used or otherwise explain how its Director of Technology searched for responsive e-mails. *Hall v. C.I.A.*, 668 F. Supp. 2d 172, 183-84 (D.D.C. 2009) ("A public body must use search terms that are reasonably calculated to locate all responsive records."). The District's response to this office also did not explain how sales of school property are documented and maintained, or describe the specific measures taken by its FOIA officer to search for records or work with central office staff to locate records.

Perhaps most importantly, the nature of this request suggests that the former Board of Education (Board) President and current Board member, Ms. Jacqueline Doss, could maintain additional records outside of the District's recordkeeping systems that relate to the sale of District property and therefore are subject to the requirements of FOIA.⁵ A news media report

⁴To the extent that Ms. Williams alleges that the District violated certain Illinois statutes in connection with the sale of a District vehicle, this office is unable to address that allegation, as the Public Access Counselor's authority to resolve disputes is limited to alleged violations of FOIA and the Open Meetings Act (5 ILCS 120/1 *et seq.* (West 2024)). *See* 15 ILCS 205/7(c)(3) (West 2024).

⁵A record pertains to the transaction of public business when it "pertain[s] to 'business or community interests as opposed to private affairs.' Indeed, FOIA is not concerned with an individual's private affairs." *City of Champaign v. Madigan*, 2013 IL App (4th) 120662, ¶ 31; *see also Better Government Ass'n v. City of Chicago*, 2020 IL App (1st) 190038, ¶ 36 (concluding that a public body failed to conduct an adequate search for public records because it did not determine whether its employees' personal devices and e-mail accounts contained responsive records).

Ms. Sequoia Williams
Mr. Anthony Ruelli
February 19, 2026
Page 4

indicates that at the Board's July 8, 2025, meeting, Ms. "Doss wanted to set the record straight on another item set on the agenda, a Ford F-150 previously sold to her for \$500. She said she introduced a motion in 2023 that allowed for district property to be sold or disposed of if not needed for school purposes. Doss claims the truck was in disrepair and of no use to anyone in the district."⁶ Although the District's response indicated that it reached out to the Board members and "direct[ed] that they provide any responsive records[,]"⁷ it did not specify which, if any, Board members responded. If the District has not already done so, it should confirm that Ms. Doss has conducted a search that was reasonably calculated to locate responsive records concerning the sale of the Ford F-150, and take similar measures to determine whether any additional undisclosed responsive records exist in electronic or physical recordkeeping systems that are likely to contain records concerning sales of District-owned vehicles.

In accordance with this determination, this office requests that the District provide Ms. Williams with a supplemental response detailing its efforts to search for the records she requested and provide her with any additional records that are located, subject to permissible redactions of discrete information, if any, that is exempt from disclosure under section 7 of FOIA (5 ILCS 140/7 (West 2024), as amended by Public Acts 104-438, effective January 1, 2026; 104-443, effective January 1, 2026). The Public Access Counselor has determined that resolution of this matter does not require the issuance of a binding opinion. This file is closed. If you have any questions, you may contact me at michael.knight@ilag.gov.

Very truly yours,



MICHAEL J. KNIGHT
Assistant Attorney General
Public Access Bureau

86894 f 3a search improper sd

⁶Brónagh Tumulty, Eli Ong, Winnie Dortch, and Marisa Rodriguez, *Country Clubs Hills school district superintendent suspended after heated board meeting*, WGN News (July 8, 2025), <https://wgntv.com/news/south-suburbs/police-intervene-after-heated-arguments-boil-over-at-south-suburban-school-board-meeting/>.

⁷Letter from Brian R. Bare, Petrarca, Gleason, Boyle & Izzo, LLC, to Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General (June 9, 2025), at 2.