



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

July 20, 2026

PUBLIC ACCESS OPINION 26-007
(Request for Review 2026 PAC 94008)

OPEN MEETINGS ACT:

Taking Final Action on Matter Not
Identified on Meeting Agenda;
Public Recital of the Nature of the
Matter Under Consideration Prior
to Taking Final Action

Ms. Melanie Jongsma
The Lansing Journal
P.O. Box 742
Lansing, Illinois 60438

The Honorable Napoleon B. Harris III
Thornton Township Supervisor
333 East 162nd Street
South Holland, Illinois 60473

Dear Ms. Jongsma and Mr. Harris:

This binding opinion is issued by the Attorney General 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 Thornton Township (Township) Board of Trustees (Board) violated section 2.02(c) of OMA (5 ILCS 120/2.02(c) (West 2024)) during its April 20, 2026, meeting by taking final action to approve the creation of five Township employment positions without setting forth the general subject matter of that action on the posted meeting agenda. This office also concludes that the Board satisfied the requirements of section 2(e) of OMA (5 ILCS 120/2.02(e) (West 2025 Supp.)) by providing an adequate public recital before taking final action.

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

Individuals with hearing or speech disabilities can reach us by using the 7-1-1 relay service.

www.IllinoisAttorneyGeneral.gov

BACKGROUND

On April 21, 2026, Ms. Melanie Jongsma, on behalf of *The Lansing Journal*, submitted a Request for Review alleging that the Board violated OMA during its April 20, 2026, meeting when it took final action to approve the creation of additional Township employment positions without providing advance notice of that action on the meeting agenda, and without specifically describing the nature of the action to be taken before the vote occurred.¹ She alleged that after the Township Supervisor asked the Board to "approve the necessary hires to go with [his] Supervisor's Report[.]" a Board Trustee made a motion to "approve the Supervisor's Report and actions set forth in the report."² Ms. Jongsma stated that the Board unanimously voted to approve the motion.³ She argued that although the meeting agenda contained the item "Approval of Supervisor's Report[.]" that agenda item did not provide the public with adequate advance notice of the Board's final action to approve the hiring of additional personnel.⁴ Ms. Jongsma alleged further that "[a]s a result, members of the public – including representatives of The Lansing Journal – were unable to determine in advance, or even at the time of the vote, the substance of the action being taken (for example, whether it involved full-time or part-time salaries, benefits, training, etc.)."⁵

On May 19, 2026, the Public Access Bureau sent the Township a copy of the Request for Review⁶ and a letter asking the Board to provide a written response to the allegations, along with copies of the agenda, minutes (in draft form, if necessary), and any recordings of the open session portion of the Board's April 20, 2026, meeting.⁷ On May 23, 2026, Ms. Jongsma provided this office with an internet link to a video recording⁸ of the

¹E-mail from Melanie Jongsma, *The Lansing Journal*, to [Teresa] Lim, [Deputy Bureau Chief, Public Access Bureau, Office of the Attorney General] (April 21, 2026).

²E-mail from Melanie Jongsma, *The Lansing Journal*, to [Teresa] Lim, [Deputy Bureau Chief, Public Access Bureau, Office of the Attorney General] (April 21, 2026).

³E-mail from Melanie Jongsma, *The Lansing Journal*, to [Teresa] Lim, [Deputy Bureau Chief, Public Access Bureau, Office of the Attorney General] (April 21, 2026).

⁴E-mail from Melanie Jongsma, *The Lansing Journal*, to [Teresa] Lim, [Deputy Bureau Chief, Public Access Bureau, Office of the Attorney General] (April 21, 2026).

⁵E-mail from Melanie Jongsma, *The Lansing Journal*, to [Teresa] Lim, [Deputy Bureau Chief, Public Access Bureau, Office of the Attorney General] (April 21, 2026).

⁶E-mail from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General, to [Casey Nesbit, Clerk, Thornton Township] (May 19, 2026).

⁷Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to the Honorable Napoleon B. Harris III, Thornton Township Supervisor (May 19, 2026), at 2.

⁸Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>.

Ms. Melanie Jongsma
The Honorable Napoleon B. Harris III
July 20, 2026
Page 3

meeting.⁹ On June 8, 2026, counsel for the Board provided this office with copies of the meeting minutes, agenda, an audio recording of the meeting, the Supervisor's Report, and a written response to Ms. Jongsma's allegations.¹⁰ On the same day, the Public Access Bureau forwarded a copy of the Board's written response to Ms. Jongsma and notified her of her opportunity to reply.¹¹ She submitted a reply on June 10, 2026.¹²

On June 18, 2026, this office extended the time for issuing a binding opinion by 21 business days, to July 20, 2026, pursuant to section 3.5(e) of OMA.¹³

ANALYSIS

Section 1 of OMA (5 ILCS 120/1 (West 2024)) provides "that public bodies exist to aid in the conduct of the people's business and that the people have a right to be informed as to the conduct of their business." Thus, the General Assembly "declares it to be the public policy of this State that its citizens shall be given advance notice of and the right to attend all meetings at which any business of a public body is discussed or acted upon in any way." 5 ILCS 120/1 (West 2024).

Final Action

In furtherance of the public policy stated above, sections 2.02(a)¹⁴ and 2.02(c) of OMA require a public body to post an agenda in advance of a meeting that lists the general subject matter of any final action that will be taken. Additionally, section 2(e) of OMA provides that "[f]inal action shall be preceded by a public recital of the nature of the matter being considered and other information that will inform the public of the business being conducted."

Although OMA does not define "final action," Illinois courts have construed a public vote that brings a matter to a resolution as final action. *See, e.g., Board of Education of*

⁹E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (May 23, 2026).

¹⁰Letter from Priscilla E. Centeno, Odelson, Murphey, Frazier & McGrath, Ltd., to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 8, 2026).

¹¹Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Melanie Jongsma, [*The Lansing Journal*] (June 8, 2026).

¹²E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 10, 2026).

¹³Letter from Michael J. Knight, Assistant Attorney General, Public Access Bureau, Office of the Attorney General, to Melanie Jongsma, [*The Lansing Journal*], and Priscilla Centeno, Senior Associate Attorney, Odelson, Sterk, Murphey, Frazier & McGrath, Ltd. (June 18, 2026).

¹⁴5 ILCS 120/2.02(a) (West 2024).

Ms. Melanie Jongsma
The Honorable Napoleon B. Harris III
July 20, 2026
Page 4

Springfield School District No. 186 v. Attorney General of Illinois, 2017 IL 120343, ¶ 74 (holding that "[u]nder the plain language of section 2(e) of the Open Meetings Act, the public vote is not merely a ratification of a final action taken earlier in a closed session; it is the final action."); *see also Jewell v. Board of Education of Community Unit School District No. 300*, 19 Ill. App. 3d 1091, 1094 (1974) ("Since a public roll call vote allows the people to know the positions taken by the individual members of the Board, so such members can be held accountable for their actions, we feel that the 'final action' is the roll call vote."). Consistent with the caselaw and the public policy underlying OMA, the Attorney General has previously concluded that "decisions which bring matters to a resolution—regardless of the outcome of the vote—constitute final actions that must be made transparently because the public has a right to know how public officials conducted themselves." Ill. Att'y Gen. Pub. Acc. Op. No. 25-009, issued August 5, 2025, at 6.

This office has reviewed the video recording of the April 20, 2026, Board meeting provided by Ms. Jongsma, as well as the audio recording provided by the Board. Near the end of the meeting, the Township Supervisor proposed "support for additional personnel."¹⁵ The Supervisor suggested adding five new employment positions to support Township operations and enhance services: a support staff position for the Township assistance program, a transportation dispatcher, a transportation manager, an administrative assistant, and a clerk for the Township Assessor's Office.¹⁶ He concluded his remarks by asking the Board for a "motion to approve the necessary hires" that he had identified in his Supervisor's Report.¹⁷ A trustee then made a "motion to approve the Supervisor's Report and actions set forth in the report."¹⁸ The Board took a roll call vote and approved the motion unanimously.¹⁹

In its response to this office, the Board argued that three of the five positions "have not been posted as of today's date, so no official action has been taken with respect to these positions."²⁰ The response also argued that the vote approving the addition of a clerk for the

¹⁵Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:26:07.

¹⁶Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:26:32 to 1:26:47.

¹⁷Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:27:08 to 1:27:11.

¹⁸Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:27:16 to 1:27:22.

¹⁹Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:27:28 to 1:27:38.

²⁰Letter from Priscilla E. Centeno, Odelson, Murphey, Frazier & McGrath, Ltd., to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 8, 2026), at 2.

Ms. Melanie Jongsma
The Honorable Napoleon B. Harris III
July 20, 2026
Page 5

Township Assessor's Office "was merely a formality" and did not constitute a final action because the Board lacked authority to make personnel decisions for the Assessor's Office.²¹ The Board cited section 2-65(a) of the Property Tax Code (35 ILCS 200/2-65(a) (West 2024)), which provides, in pertinent part:

In all counties under township organization where a township or multi-township assessor is unable alone to perform all duties of the office, he or she may appoint one or more suitable persons as deputies to assist in making the assessment, and may appoint other employees required for operation of the office.

In her reply, Ms. Jongsma noted that a motion had been made and seconded, and that the trustees took a roll call vote to authorize the Township to create and fill these positions.²² She argued that "[t]his vote granted the Supervisor legal and budgetary authorization to create and fill these roles. The physical act of posting a job description at a later date is an administrative task; the legislative 'final action' occurred during the vote."²³

The Board's argument that no final action occurred because some of the positions were not posted after the vote and because the Board lacks authority over hiring in the Assessor's Office misconstrues the requirements and public policy behind OMA's requirements that final action be preceded by public notice and a public recital. OMA requires public bodies to notify the public before meetings of the actions that will be contemplated and to disclose information about those actions during meetings to ensure that members of the public have an opportunity to be present and informed about the conduct of public business. Whether the actions taken by public bodies are within a public body's authority or subsequently effectuated are separate matters that OMA does not govern. *See* Ill. Att'y Gen. Pub. Acc. Op. No. 24-003, issued March 1, 2024, at 7-9 (city council's approval to enter a representation agreement constituted final action even if the city manager had authority to effectuate the agreement without city council approval).

During the Board's April 20, 2026, meeting, the Supervisor expressly sought and received the Board's approval to create five positions in the Township. Because the vote resolved the question of whether the Board approved of the creation of those positions, the vote constituted "final action" for purposes of section 2.02(c) and 2(e) of OMA. Therefore, this office

²¹Letter from Priscilla E. Centeno, Odelson, Murphey, Frazier & McGrath, Ltd., to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General] (June 8, 2026), at 2.

²²E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 10, 2026).

²³E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 10, 2026).

must determine whether the Board provided the public with adequate advance notice of that final action in its April 20, 2026, meeting agenda and a sufficient public recital during the meeting.

Sufficiency of the Agenda

Section 2.02(a) of OMA provides that "[a]n agenda for each regular meeting shall be posted at the principal office of the public body and at the location where the meeting is to be held at least 48 hours in advance of the holding of the meeting." Section 2.02(c) of OMA further requires that "[a]ny agenda required under this Section shall set forth the general subject matter of any resolution or ordinance that will be the subject of final action at the meeting."

OMA does not define the term "general subject matter." However, the Senate debate on House Bill No. 4687, which, as Public Act 97-827, effective January 1, 2013, added section 2.02(c) of OMA, indicates that the General Assembly intended this provision to ensure that agendas provide sufficiently descriptive advance notice of the matters upon which a public body anticipates taking final action:

[T]here was just no real requirement as to how specific they needed to be to the public of what they were going to discuss that would be final action. And this just says that you have to have a * * * general notice, if you're going to have and take final action, as to generally what's going to be discussed so that – that people who follow their units of local government know what they're going to be acting upon. Remarks of Sen. Dillard, May 16, 2012, Senate Debate on House Bill No. 4687, at 47.

The agenda item that corresponds to the approval of the employment positions at the Board's April 20, 2026, meeting merely states:

XII. Supervisor Report A. Approval of Supervisor's Report^[24]

The Board's response to this office included a copy of the Supervisor's Report,²⁵ which contains updates on several topics and includes a request to create the employment positions that the Board approved during the meeting. But the Board's response did not specifically address the sufficiency of the agenda item.²⁶ Ms. Jongsma's reply asserted that "[a]

²⁴Thornton Township Board of Trustees, Agenda Item XII, Meeting (April 20, 2026).

²⁵Supervisor's Report, [Napoleon B. Harris, Supervisor, Thornton Township] (undated).

²⁶Letter from Priscilla E. Centeno, Odelson, Murphey, Frazier & McGrath, Ltd., to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Illinois Attorney General] (June 8, 2026).

member of the public scanning the published agenda could not reasonably anticipate that 'Approval of Supervisor's Report' would include a vote to expand the Township's employment roster and allocate taxpayer funds for new positions."²⁷

The agenda item "Approval of Supervisor's Report" provided no indication that the Board would take any action concerning the creation of employment positions. Because the agenda did not set forth the general subject matter of the Board's final action to create employment positions, the Board violated section 2.02(c) of OMA.

Public Recital

As cited above, section 2(e) of OMA provides that "[f]inal action shall be preceded by a public recital of the nature of the matter being considered and other information that will inform the public of the business being conducted."

In *Board of Education of Springfield School District No. 186*, 2017 IL 120343, ¶ 9, the Illinois Supreme Court considered whether a school board provided an adequate public recital before voting to approve a separation agreement with its superintendent. The recital in that case consisted of the school board president stating that the board was considering an agenda item for "'approval of a resolution regarding the separation agreement[']" as well as reading the text of the resolution itself: "'The Board President recommends that the Board of Education of Springfield School District No. 186 vote to approve the separation agreement and release between Dr. Walter Milton, Jr., and the Board of Education.'" *Springfield School District*, 2017 IL 120343, ¶ 81. The Court concluded that the school board's public recital was sufficient: "The board president recited the general nature of the matter under consideration—a separation agreement and release—and specific detail sufficient to identify the particular transaction—the separation agreement was between Dr. Milton and the Board." *Springfield School District*, 2017 IL 120343, ¶ 83. The Court explained that "while the 'nature of the matter' may be recited in nonspecific terms (the approval of a loan, a contract, a purchase, a policy, or a resolution), 'other information' is necessary to inform the public of the specific item of business (the purpose of the loan, the subject of the contract, the type of property being purchased, the title of the policy, or the purpose of the resolution)." *Springfield School District*, 2017 IL 120343, ¶ 50. Notably, the Court rejected the notion that section 2(e) of OMA requires a public body to publicly recite "key terms" such as the amount of the separation agreement, stating that section 2(e) is satisfied when the recital announces "the nature of the item under consideration with sufficient detail to identify the particular transaction or issue[.]" *Springfield School District*, 2017 IL 120343, ¶¶ 61, 64.

In its response to this office, the Board argued that the Township Supervisor satisfied the public recital requirement in section 2(e) by naming the five new positions that he

²⁷E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 10, 2026).

proposed creating and explaining the need for the additional personnel.²⁸ In her reply, Ms. Jongsma argued that that information was insufficient because it "omitted crucial details necessary for true public accountability, including whether the roles were full-time or part-time, what salaries were being authorized, the cost of any benefits packages, and the cumulative impact on the township budget."²⁹

This office's review of the meeting recording confirmed that before asking for the Board's approval of the employment positions, the Township Supervisor identified the specific positions that he proposed creating.³⁰ He also explained that the need for the additional personnel arose from increasing demands related to the Township Assistance Program and other Township services.³¹ The Supervisor then requested a "motion to approve the necessary hires that go with my Supervisor's Report."³² A member of the Board immediately offered a "motion to approve the Supervisor's Report and actions set forth in the report," which the Board approved.³³

Although the Board could have more clearly informed the public by re-stating the five proposed employment positions in the motion, the Supervisor, who is the chairman of the Board,³⁴ described each of the positions and the justification for them before asking for the Board's approval. Those comments and the motion announced the nature of the matter under consideration with sufficient detail to identify the issue being decided. In accordance with the holding in *Springfield School District No. 186*, the Board's public recital was not required to describe the financial impact of the proposal or key terms, such as the salaries and benefits associated with the positions. Accordingly, this office concludes that the Board satisfied the requirements of section 2(e) by providing an adequate public recital before taking final action.

²⁸Letter from Priscilla E. Centeno, Odelson, Murphey, Frazier & McGrath, Ltd., to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 8, 2026) at 1-2.

²⁹E-mail from Melanie Jongsma, *The Lansing Journal*, to [Michael J.] Knight, [Assistant Attorney General, Public Access Bureau, Office of the Attorney General] (June 10, 2026).

³⁰Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:26:32 to 1:26:47.

³¹Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:26:07 to 1:26:58.

³²Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:26:59 to 1:27:14.

³³Thornton Township Board of Trustees Meeting, *April 20, 2026, Meeting*, YouTube (April 20, 2026), <https://www.youtube.com/watch?v=x5qlPEz4uTM>, at 1:27:16 to 1:27:22.

³⁴60 ILCS 1/80-5 (West 2024).

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 April 21, 2026, Ms. Melanie Jongsma, on behalf of *The Lansing Journal*, submitted a Request for Review alleging that the Thornton Township Board of Trustees violated OMA during its April 20, 2026, meeting by taking final action to approve the creation of new employment positions without providing advance notice of that action on the meeting agenda, and without specifically describing the nature of the action before the Board voted. Ms. Jongsma's Request for Review was timely filed and otherwise complies with the requirements of section 3.5(a) of OMA.

2) On May 19, 2026, 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 asking it to provide a written response to Ms. Jongsma's allegations, along with copies of the agenda, minutes, and any recordings of the open session portion of the Board's April 20, 2026, meeting.

3) On June 8, 2026, counsel for the Board provided this office with a written response and copies of the meeting minutes, agenda, audio recording of the meeting, and the written Supervisor's Report.

4) On the same day, the Public Access Bureau forwarded a copy of the Board's written answer to Ms. Jongsma and notified her of her opportunity to reply. She replied on June 10, 2026.

5) On June 18, 2026, the Public Access Bureau extended the time within which to issue a binding opinion by 21 business days 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 2.02(c) of OMA provides that "[a]ny agenda required under this Section shall set forth the general subject matter of any resolution or ordinance that will be the subject of final action at the meeting."

7) At its April 20, 2026, meeting, the Board made a motion to "approve the Supervisor's Report and actions set forth in the report[.]" which included the approval of the Township Supervisor's proposal to create new Township employment positions. The Board voted in favor of the motion.

8) Because the Board's vote resolved the question of whether the Board approved the creation of the new positions, the vote constituted a final action for purposes of OMA.

Ms. Melanie Jongsma
The Honorable Napoleon B. Harris III
July 20, 2026
Page 10

9) The agenda item that corresponded to the Board's final action on the employment positions merely indicated that the Board would consider approving the Supervisor's Report. That agenda item did not set forth the general subject matter of the vote to create new Township employment positions. Therefore, this office concludes that the Board violated section 2.02(c) of OMA in connection with that final action.

10) Section 2(e) of OMA provides that "[f]inal action shall be preceded by a public recital of the nature of the matter being considered and other information that will inform the public of the business being conducted."

11) Before the motion and vote, the Township Supervisor named the positions for which he was requesting Board approval and explained why he was requesting approval to create additional positions. A member of the Board then made a "motion to approve the Supervisor's Report and actions set forth in the report." Because the Board announced the nature of the matter under consideration with sufficient detail to identify the issue being decided, this office concludes that the Board satisfied the public recital requirement of section 2(e) of OMA.

In accordance with these findings of fact and conclusions of law, the Board is directed to remedy its violation of section 2.02(c) of OMA by re-voting on the approval of the creation of the new employment positions after posting a meeting agenda that sets forth the general subject matter of that proposed action. As required by section 3.5(e) of OMA, the Board shall either take the necessary action as soon as practical to comply with the directives of this opinion or shall initiate administrative review under section 7.5 of OMA. 5 ILCS 120/7.5 (West 2024).

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 within 35 days of the date of this decision naming the Attorney General of Illinois and Ms. Melanie Jongsma, or the Attorney General of Illinois and the Supervisor of Thornton Township, as defendants. *See* 5 ILCS 140/11.5 (West 2024).

Sincerely,

KWAME RAOUL
ATTORNEY GENERAL

By:



R. Douglas Rees
Chief Deputy Attorney General

Ms. Melanie Jongsma
The Honorable Napoleon B. Harris III
July 20, 2026
Page 11

cc: Ms. Priscilla E. Centeno
Senior Associate Attorney
Odelson, Murphey, Frazier & McGrath, Ltd.
3318 West 95th Street
Evergreen Park, Illinois 60805

CERTIFICATE OF SERVICE

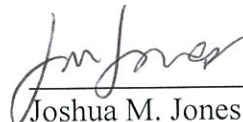
Joshua M. Jones, Bureau Chief, Public Access Bureau, Chicago, hereby certifies that he has served a copy of the foregoing Binding Opinion (Public Access Opinion 26-007)

Ms. Melanie Jongsma
The Lansing Journal
P.O. Box 742
Lansing, Illinois 60438
mjonsma@thelansingjournal.com

The Honorable Napoleon B. Harris III
Thornton Township Supervisor
333 East 162nd Street
South Holland, Illinois 60473
nharris@thorntontwp.com

Ms. Priscilla E. Centeno
Senior Associate Attorney
Odelson, Murphey, Frazier & McGrath, Ltd.
3318 West 95th Street
Evergreen Park, Illinois 60805
pcenteno@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 July 20, 2026.



Joshua M. Jones
Bureau Chief

Joshua M. Jones
Bureau Chief
Public Access Bureau, Chicago
Office of the Attorney General
115 South LaSalle Street
Chicago, Illinois 60603
(312) 814-8413