



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

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ATTORNEY GENERAL

January 5, 2026

Via electronic mail



Via electronic mail

Ms. Kathryn Anderson
Freedom of Information Act Officer
1040 Park Avenue West
Highland Park, Illinois 60035
kanderson@dist113.org

RE: FOIA Request for Review – 2025 PAC 90586

Dear [REDACTED] and Ms. Anderson:

This determination is issued pursuant to section 9.5(c) of the Freedom of Information Act (FOIA).¹ For the reasons explained below, the Public Access Bureau will take no further action in this matter, but this letter provides guidance in the Public Access Bureau's educational capacity.²

On September 11, 2025, [REDACTED] submitted a twenty-two-part FOIA request to Township High School District 113 (District) seeking copies of various categories of records, such as certain District policies, mission statements, job postings, employment applications, correspondence, and documents regarding investigations of applicants and District

¹5 ILCS 140/9.5(c) (West 2024).

²In addition to resolving Requests for Review, the Public Access Bureau is charged with providing advice and education to both the public and public officials. *See* 15 ILCS 205/7(a), (b), (c) (West 2024).

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██████████
Ms. Kathryn Anderson
January 5, 2026
Page 2

employees. On September 18, 2025, the District notified ██████████ that it was treating the request as "voluminous" as defined in section 2(h) of FOIA.³ The District informed ██████████ that he had ten business days to amend the request such that it would no longer be voluminous, which he declined to do. Therefore, the District extended its time to respond to the request pursuant to section 3.6(d) of FOIA.⁴ On October 9, 2025, the District respond by providing ██████████ with a link to the District's website for the policies and missions statement, citing section 8.5(a) of FOIA.⁵ The District also provided ██████████ with copies of some records it deemed responsive to the request, but indicated that it redacted and withheld other information and documents pursuant to sections 7(1)(a), 7(1)(b), 7(1)(c), 7(1)(f), and 7.5(r) of FOIA.⁶

On November 12, 2025, ██████████ submitted a Request for Review to the Public Access Bureau challenging the District's response. In his Request for Review, ██████████ argued, among other things, that "[n]one of the enumerated requests are responded to individually or specifically. The appended documents shed little if any light as to what the District is responding to what it is ignoring or to which it has no responsive documents."⁷

Although FOIA "is not intended to compel public bodies to interpret or advise requesters as to the meaning or significance of the public records"⁸ when a FOIA request contains multiple parts, a public body's response should clearly identify which records correspond to each portion of the request. *See* Ill. Att'y Gen. PAC Req. Rev. Ltr. 30548, issued July 10, 2015, at 3; *see also Rockford Police Benevolent and Protective Ass'n, Unit No. 6 v. Morrissey*, 398 Ill. App. 3d 145, 150 (2010) ("To meet its burden * * *, the public body must provide a detailed justification for its claim of exemption, addressing the requested records specifically and in a manner allowing for adequate adversarial testing."). Likewise, if a public body does not maintain any records that respond to portions of a request, it should explicitly tell the requester in its response. *See* Ill. Att'y Gen. PAC Req. Rev. Ltr. 57553, issued April 22, 2019.

³5 ILCS 140/2(h) (West 2024).

⁴5 ILCS 140/3.6(d) (West 2024).

⁵5 ILCS 140/8.5(a) (West 2024).

⁶5 ILCS 140/7(1)(a), (1)(b), (1)(c), (1)(f) (West 2024); 5 ILCS 140/7.5 (West 2024), as amended by Public Acts 104-010, effective June 16, 2025; 104-018, effective June 30, 2025; 104-417, effective August 15, 2025; 104-428, effective August 18, 2025.

⁷Letter from ██████████ to Public Access Counselor, Office of the Attorney General, Public Access Bureau (November 11, 2025).

⁸5 ILCS 140/3.3 (West 2024).

In this instance, the District's response did not make clear to which parts of [REDACTED] FOIA request the provided records corresponded, to which parts the District did not maintain responsive records, or which records were redacted or withheld under the cited FOIA exemptions. Nonetheless, [REDACTED] request is unduly burdensome on its face.

Section 3(g) of FOIA⁹ provides, in pertinent part:

Requests calling for all records falling within a category shall be complied with unless compliance with the request would be unduly burdensome for the complying public body and there is no way to narrow the request and the burden on the public body outweighs the public interest in the information. Before invoking this exemption, the public body shall extend to the person making the request an opportunity to confer with it in an attempt to reduce the request to manageable proportions. If any public body responds to a categorical request by stating that compliance would unduly burden its operation and the conditions described above are met, it shall do so in writing, specifying the reasons why it would be unduly burdensome and the extent to which compliance will so burden the operations of the public body. Such a response shall be treated as a denial of the request for information.

Illinois courts analyzing section 3(g) of FOIA have determined that a categorical FOIA request seeking a broad range of records must be specifically targeted to advance a significant public interest to outweigh the burden of compliance on a public body. *See, for example, Sargent Shriver National Center on Poverty Law, Inc. v. Board of Education of City of Chicago*, 2018 IL App (1st) 171846, ¶¶ 39-41 (determining that although the topic of the school-to-prison pipeline is of significant public interest, the year-long scope of the request for employee misconduct reports in a large school district was indicative of a fishing expedition rather than an appropriately targeted request, such as a request limited to suspected misconduct within a specific school or of a specific officer, or schools with the highest student arrest rates); *National Ass'n of Criminal Defense Lawyers v. Chicago Police Department*, 399 Ill. App. 3d 1, 17 (2010) ("A request that is overly broad and requires the public body to locate, review, redact and arrange for inspection a vast quantity of material that is largely unnecessary to the [requester's] purpose constitutes an undue burden."); *see also* Ill. Att'y Gen. PAC Req. Rev. Ltr. 69259, issued February 1, 2022, at 3-4 (taking no further action on a request for review involving five requests seeking categories of communications because the requests were overly broad and unduly burdensome on their face, and the requester did not identify a public interest in disclosure that outweighed the burden of compliance).

⁹ 5 ILCS 140/3(g) (West 2024).

Here, [REDACTED] request is vast in scope, seeking twenty-two different categories of records, some of which do not include specific time parameters. Other portions seek broad categories of records rather than those tailored to the requests' primary purpose, which [REDACTED] indicated was to discover information about a District hiring decision that he argued was improper and may have potentially violated State and federal anti-discrimination laws. The Request for Review also indicates that the request is intended to shed light on systematic misconduct and a lack of oversight and corrective action. While there is certainly public interest in the disclosure of information regarding the District's hiring process and alleged misconduct, it is not apparent to this office that the stated public interest warrants the disclosure of **all** the requested records. *See, for example*, Ill. Att'y Gen. PAC Req. Rev. Ltr. 47671, issued August 10, 2017, at 4 ("There is no question that the public interest in collective bargaining generally and unionization at Noble is high, but there is no indication that [the requester's] request for all e-mails sent or received by the three individuals at issue over that 17-day period containing the broad term 'union' could not be appropriately narrowed to more specifically target records responsive to the purpose of her request."). Although the District did not raise the section 3(g) exemption in its response to the request, it may appropriately offer [REDACTED] the opportunity to narrow his request to manageable proportions at this time under these circumstances. *See Kelly v. Village of Kenilworth*, 2019 IL App (1st) 170780, ¶ 49.

Because the FOIA request at issue in this matter is overly broad and because the District's response lacks sufficient detail concerning the extent to which it possesses responsive records and the nature of the records that were withheld, this office will not take further action at this juncture but instead asks the parties to confer about potentially resolving this matter, at least partially, in a mutually agreeable manner. We suggest that the District confer with [REDACTED] to clarify its response and the type of records that were withheld and recommend that [REDACTED] significantly narrow the scope of his request to exclude any documents the District has already provided to him and to more specifically target records directly responsive to the purpose of his request. For example, [REDACTED] may wish to revise his request for "prior complaints from any source concerning [REDACTED] during his tenure as athletic director"¹⁰ to complaints concerning particular topics or subject matters. For each part of the request, the District should issue a response that clearly delineates which specific records correspond to which portion of the request in a manner that would allow for adequate adversarial testing, including explaining whether records responsive to each part of the request were withheld or redacted and a citation to the exemption(s) that the District relied upon for those actions. If the District has no documents responsive to a particular portion of the multipart request, it should expressly state that in its response.

This office also notes that [REDACTED]'s Request for Review contains allegations and arguments beyond the scope of this office's authority, which is limited to reviewing alleged

¹⁰Letter from [REDACTED] to Dr. Chala Holland, Township High School District 113 (September 11, 2025).

[REDACTED]
Ms. Kathryn Anderson
January 5, 2026
Page 5

violations of FOIA and the Open Meetings Act (OMA) (5 ILCS 120/1 *et seq.* (West 2024)). *See* 15 ILCS 205/7(c)(3) (West 2024). If [REDACTED] submits any future Requests for Review, he should limit his complaints to FOIA and OMA matters that the General Assembly has authorized the Public Access Counselor to review.

This file is closed. If you have FOIA questions, my e-mail address is shannon.barnaby@ilag.gov.

Very truly yours,

[REDACTED]
SHANNON BARNABY
Senior Assistant Attorney General
Public Access Bureau

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