



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

KWAME RAOUL  
ATTORNEY GENERAL

June 6, 2025

*Via electronic mail*



RE: FOIA Request for Review – 2024 PAC 84503; CPD FOIA No. P005759

Dear 

This determination letter is issued pursuant to section 9.5(c) of the Freedom of Information Act (FOIA) (5 ILCS 140/9.5(c) (West 2023 Supp.)). For the reasons set forth below, the Public Access Bureau concludes that this Request for Review is unfounded.

On December 6, 2024, you submitted a FOIA request to the Chicago Police Department (CPD) seeking records related to a December 2, 2024, incident involving criminal damage to a motor vehicle. In its December 23, 2024, response to you, CPD explained that it required a government-issued photo identification in order to confirm your identity as the victim underlying the requested incident report. Absent the receipt of a photo ID, CPD denied your request in its entirety pursuant to section 7(1)(c) of FOIA (5 ILCS 140/7(1)(c) (West 2023 Supp.), as amended by Public Acts 103-605, effective July 1, 2024). Later that same day, the Public Access Bureau received your Request for Review contesting CPD's denial.

Section 7(1)(c) of FOIA exempts from disclosure "[p]ersonal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, **unless the disclosure is consented to in writing by the individual subjects of the information.**" (Emphasis added.) Section 7(1)(c) defines "unwarranted invasion of personal privacy" as:

[T]he disclosure of information that is highly personal or objectionable to a reasonable person and in which the subject's

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](http://www.IllinoisAttorneyGeneral.gov)

right to privacy outweighs any legitimate public interest in obtaining the information. The disclosure of information that bears on the public duties of public employees and officials shall not be considered an invasion of personal privacy.

The Public Access Bureau has consistently determined that the disclosure of information identifying a victim of a criminal offense would constitute a clearly unwarranted invasion of personal privacy and therefore that such information may be redacted from a record pursuant to section 7(1)(c). *See, e.g.*, Ill. Att'y Gen. PAC Req. Rev. Ltr. 26904, issued April 16, 2014, at 2. *Coleman v. F.B.I.*, 13 F. Supp. 2d 75, 80 (D.D.C. 1998) (disclosure of FBI documents would constitute an unwarranted invasion of personal privacy because "it is evident that release of any portion would reveal the identities of innocent third parties, witnesses or victims."). In addition, section 7(1)(d)(iv) of FOIA<sup>1</sup> exempts from disclosure, in relevant part, information that would unavoidably disclose the identity of persons who file complaints with or provide information to law enforcement agencies. The Illinois Appellate Court has concluded that records reflecting information provided by witnesses may be withheld in their entirety if disclosure of the contents "would necessarily result in the disclosure of the identity of that source" of the information and, therefore, "redaction of the [records] cannot be meaningfully accomplished." *Copley Press, Inc. v. City of Springfield*, 266 Ill. App. 3d 421, 426 (1994).

In a June 6, 2025, e-mail to the Deputy Public Access Counselor, CPD stated:

The requester named the victim of this criminal offense which was documented in the original case incident report. Even though the requester's name is identical to the named victim, we have no way to verify this relationship without the requester providing to us some type of identification to verify his identity. To protect the personal privacy of a named criminal victim, we denied the request in its entirety citing 7(1)(c) which I believe to be the proper course of action. I can also confirm that there were no arrests associated with this incident.<sup>[2]</sup>

It is undisputed that you sought records concerning criminal damage to a named individual's motor vehicle, which is highly personal in nature. Although you purport to be the named crime victim underlying the requested report, CPD has been unable to confirm your identity absent a photo ID. Under these circumstances, this office concludes that CPD did not improperly deny your December 6, 2024, FOIA request pursuant to section 7(1)(c) of FOIA. Accordingly, this

---

<sup>1</sup>5 ILCS 140/7(1)(d)(iv) (West 2023 Supp.), as amended by Public Acts 103-605, effective July 1, 2024.

<sup>2</sup>E-mail from Michael Onesto #1739, Sergeant, Chicago Police Department, Freedom of Information Act (FOIA) Unit #114, to Christopher Boggs (June 6, 2025).

[REDACTED]  
June 6, 2025

Page 3

Request for Review is unfounded. If you still are seeking the records responsive to your request, you may wish to submit your photo ID and written consent to CPD.

This file is closed. If you have any questions, please contact me at the Springfield address on the first page of this letter.

Very truly yours,

[REDACTED]  
CHRISTOPHER R. BOGGS  
Deputy Public Access Counselor  
Public Access Bureau

84503 f unf pd

cc: *Via electronic mail*  
Mr. Vaughn C. Ganiyu  
Assistant General Counsel  
Chicago Police Department  
3510 South Michigan Avenue, 5th Floor  
Chicago, Illinois 60653  
[pacola@chicagopolice.org](mailto:pacola@chicagopolice.org)