

No. 132241

**IN THE
SUPREME COURT OF ILLINOIS**

CHICAGO JOHN DINEEN LODGE	)	
No. 7,	)	
	)	
Appellant,	)	On Appeal from the
	)	Appellate Court of Illinois,
v.	)	First Judicial District,
	)	Appeal No. 1-24-0875
THE CITY OF CHICAGO; THE	)	
DEPARTMENT OF POLICE;	)	Heard on Appeal from the
BRANDON JOHNSON, in his Official	)	Circuit Court of Cook County,
Capacity as Mayor; LARRY SNELLING,	)	No. 24 CH 00093
in his Official Capacity as Superintendent	)	
of the Chicago Police Department; and	)	
THE CHICAGO CITY COUNCIL,	)	
	)	
Appellees.	)	

**BRIEF OF AMICUS CURIAE ILLINOIS AFL-CIO, ASSOCIATED FIRE
FIGHTERS OF ILLINOIS, AND AMERICAN FEDERATION OF STATE,
COUNTY, AND MUNICIPAL EMPLOYERS, COUNCIL 31
IN SUPPORT OF APPELLANT
CHICAGO JOHN DINEEN LODGE NO. 7**

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POINTS AND AUTHORITIES

Interests of Amicus Curiae	1
Argument	2
I. This Court Should Reverse the First District’s Decision Because It Jeopardizes the Arbitration Process.....	2
A. Parties to Collective Bargaining Agreements Have Agreed to be Bound By Confidentiality Rules of Arbitration	2
5 ILCS 315/14(a).....	3
5 U.S.C.A. 574(b)	3
B. All Non-Public Arbitration Proceedings Will Be Subject to Vacatur on Public Policy Grounds	4
<i>Chicago Transit Authority v. Amalgamated Transit Union Local 308</i> , 2018 IL App (1st) 170702.....	4
C. The First District’s Decision Overlooks the Public Policy Interest in Efficiency and Fairness of Arbitration	5
II. The First District’s Decision Ignores Clear and Well-Defined Public Policy Against Disclosure of Arbitration Proceedings.....	6
A. Exemptions to Public Disclosures under FOIA	6
<i>American Federation of State, County and Municipal Employees, AFL–CIO v. Department of Central Management Services</i> , 173 Ill.2d 299 (1996).....	6
<i>Chicago John Dineen Lodge No. 7 v. City of Chicago; The Department of Police; Brandon Johnson, in His Official Capacity as Mayor; Larry Snelling, in His Official Capacity as Superintendent of the Chicago Police Department; and the Chicago City Counsel</i> , 2025 IL App (1st) 240875.....	6
5 ILCS 140/7(n)	7, 9
5 ILCS 140/7(c).....	9
5 ILCS 140/7(d)(i).....	9
5 ILCS 140/7(p)	9
5 ILCS 140/7(g)	9

5 ILCS 140/7(s)	9
5 ILCS 140/7(y)	9
5 ILCS 140/7(f)	9
5 ILCS 140/7(ss)	9
5 ILCS 430/20-90(a), 25-90(a).....	10
820 ILCS 219/70(d)	10
B. Exemptions to Public Disclosure under the Open Meetings Act and the IPLRA	10
5 ILCS 120/2(c)(1)	10
5 ILCS 120/1... ..	10
5 ILCS 315/24... ..	11
III. The First District’s Decision is Based on a Faulty Premise	11
IV. The First District’s Decision is Arbitrary	12
Conclusion.....	13
Certificate of Compliance	15
Certificate of Filing and Service	16

INTEREST OF AMICUS CURIAE

The Illinois State Federation of Labor and Congress of Industrial Organizations (hereinafter “State Federation” or “Illinois AFL-CIO”) is the statewide organization chartered by the American Federation of Labor-Congress of Industrial Organizations (“AFL-CIO”) to represent the interests of more than 1,600 local affiliates and their 1.2 million members.

The Associated Firefighters of Illinois (“AFFI”) serves as the Illinois state labor association of the International Association of Firefighters. The AFFI has approximately 224 associated locals, representing firefighters across the state of Illinois. All affiliated local unions serve as the exclusive bargaining representatives of the firefighters and paramedics employed by municipalities or fire protection districts across the state of Illinois, advocating for fair wages, workplace protections, and quality public services throughout Illinois.

The American Federation of State, County and Municipal Employees, Council 31 (“Council 31”) is the Illinois state council of the American Federation of State, County and Municipal Employee. Council 31 represents tens of thousands of public service workers across Illinois, including state, county, and municipal employees, as well as employees in universities, school districts, and nonprofit agencies. Its affiliated local unions serve as the exclusive bargaining representatives of their members, advocating for fair wages, workplace protections, and quality public services throughout Illinois.

Illinois AFL-CIO, AFFI, and Council 31 have a significant interest in this Court’s review of the issues raised by Petitioner Chicago John Dineen Lodge No. 7’s (“Lodge” or “Union”) appeal, as the First District’s holding threatens the arbitration process, privacy of workers, and the integrity of collective bargaining agreements for all public employees.

Illinois AFL-CIO, AFFI, and Council 31 understand that it is not a right to appear and address this Court as *amici curiae*. However, Illinois AFL-CIO, AFFI, and Council 31 have a significant interest in the reversal of the First District's decision and can provide this Court with insights on the effects of this case on parties other than the named parties.

ARGUMENT

This issue before this Court is whether the First District correctly vacated that portion of an interest arbitration award which provided that grievance arbitration proceedings be closed to the public because such decision violates the well-defined and dominant public policy of the State. The First District found that this provision of the interest arbitration award violated the public policy as set forth in FOIA. This decision was made in error.

I. This Court Should Reverse the First District's Decision Because It Jeopardizes the Arbitration Process.

A. Parties to Collective Bargaining Agreements Have Agreed to be Bound By Confidentiality Rules of Arbitration.

The First District's decision that arbitration hearings closed to the public violate public policy should be reversed because it undermines the core integrity of the arbitration process in public sector labor relations. Most, if not all, collective bargaining agreements with public employers incorporate reference to the National Academy of Arbitrators, and/or the American Arbitration Association and/or the Judicial Arbitration and Mediation Services and/or the Federal Mediation and Conciliation Service¹. For example, the City of Chicago's CBA with Lodge 7 requires that panels of arbitrators be provided by the American Arbitration Association. (C 1052, 1059, 1062).

¹ Even the IPLRA incorporates by reference the rules of FMCS- specifically with regard to resolution of interest arbitration disputes. 5 ILCS 315/14(a).

That CBA also mandates membership in the National Academy of Arbitrators as a requirement for any arbitrator to be qualified to serve on a dispute resolution board or to hear a suspension grievance. (C 1059, 1062). Each of these types of organizations have their own codes, rules and procedures that arbitrators are required to abide by.

Consequently, including the contractual requirement that arbitrators be selected from certain professional organizations comes with an understanding that they would be required to comply with those rules and regulations of the respective organizations.

For example, the American Arbitration Association Labor Arbitration Rule 21 unequivocally directs arbitrators to “maintain the privacy of the hearing unless the law provides to the contrary,” thereby ensuring that sensitive disciplinary and employment information remains shielded from unnecessary public exposure.² In Illinois, as will be discussed more fully below, arbitration or other adjudication of grievances are protected from public disclosure under FOIA. Likewise, Section C of the National Academy of Arbitrators’ Code of Professional Responsibility provides that “[a]ll significant aspects of an arbitration proceeding must be treated...as confidential” unless both parties consent to disclosure or legal compulsion exists.³ The same is true of Section IV of the JAMS Arbitrator Ethics Guidelines, which mandates that arbitrators “keep confidential all matters relating to the Arbitration proceedings and decisions” absent express authorization.⁴ Even federal law reflects this expectation, as under 5 U.S.C.A. § 574(b),

² American Arbitration Association Labor Arbitration Rules available at: <https://www.adr.org/rules-forms-and-fees/labor/>

³ National Academy of Arbitrators’ Code of Professional Responsibility available at: <https://naarb.org/code-of-professional-responsibility/>

⁴ JAMS Arbitrator Ethics Guidelines available at: <https://www.jamsadr.com/arbitrators-ethics/>

governing proceedings before the Federal Mediation and Conciliation Service, “[a] party to a dispute resolution proceeding shall not voluntarily disclose or through discovery or compulsory process be required to disclose any dispute resolution communication.”

The well-established professional codes of arbitrators make confidentiality a cornerstone of fair and effective arbitration. These arbitral professional codes of conduct are deliberately and expressly chosen by the parties when they negotiate and enter into collective bargaining agreements. These provisions are not casual customs or aspirational guidelines. These are binding professional standards, chosen deliberately by parties and memorialized in collective bargaining agreements to structure the arbitration process and protect its integrity. By disregarding these standards, the First District does more than undermine a single collective bargaining agreement; it destabilizes the carefully negotiated balance of labor-management relations and casts doubt on the legitimacy of arbitration as a trusted adjudication mechanism nationwide. If courts can sweep aside such fundamental rules in service of an ill-defined notion of “public policy,” then no collectively bargained-for provision is secure, and the predictability on which both employers and unions have relied upon for decades will erode.

B. All Non-Public Arbitration Proceedings Will be Subject to Vacatur on Public Policy Grounds.

Illinois law has long recognized that arbitration awards are entitled to the highest degree of judicial deference, and courts may vacate such awards only on narrow grounds such as fraud, corruption, or an explicit violation of a well-defined and dominant public policy. *Chicago Transit Authority v. Amalgamated Transit Union Local 308*, 2018 IL App (1st) 170702, ¶ 16. By setting aside portions of the award based on generalized notions of “transparency,” the Court has provided a built-in basis to vacate grievance

arbitration awards. Any participant in an arbitration proceeding need only request that a hearing be open to the public. All arbitrators selected from the above referenced professional organizations would be duty bound to deny any such request as is required by those organizations' professional rules of conduct incorporated by reference into collective bargaining agreements. Once an arbitration decision is issued, any participant displeased with the outcome would now have a built-in basis to vacate that award under the public policy of public transparency established by the First District. Where arbitration was once favored as the preferred method of disputes due to its finality, it would now become a stepping stone to continual judicial review.

Such continual judicial overview threatens to destabilize collective bargaining by inviting constant re-litigation of arbitration outcomes. If left undisturbed, the ruling will erode confidence in arbitration as a final and reliable means of settling labor disputes, weakening both collective bargaining rights and labor peace.

C. The First District's Decision Overlooks the Public Policy Interest in Efficiency and Fairness of Arbitration.

Arbitration has long been embraced by the legislature and public employers because it provides an efficient, cost-effective, and fair method of resolving disputes. Unlike court proceedings, arbitration hearings are private and streamlined, reducing the expense of securing large public facilities, minimizing security risks, and ensuring that witnesses can testify candidly without fear of intimidation, retaliation from the public, or distortion through media coverage. Public employees whose innocence is vindicated by an arbitrator's ruling may never be able to clear their name in court of public opinion if the hearing process is made public. An employee who is absolved of the allegations made against them at a grievance hearing may still be unable to return to work if those

unproven allegations have already created a public frenzy. That employee seeking employment at any other employer would now be haunted by the allegations which the employer could not prove, making subsequent employment more difficult. Instead of a grievance arbitration hearing being the final step of due process, a hearing open to the public creates an endless battle in the court of public opinion where there is no due process.

These are not incidental benefits of arbitration, but are central to the public policy interest that arbitration best serves both employers and employees in resolving disputes. The First District's ruling, however, disregards these established policy objectives and dismisses efficiency and security as irrelevant when weighed against a generalized notion of "transparency."

By requiring that arbitration proceedings be opened to the public, the decision would impose significant new costs on taxpayers and labor organizations, create administrative and logistical burdens on arbitrators, public employers, unions and their bargaining unit members and expose employees to the very real risk of prejudgment reputational harm and workplace consequences. The First District offers no analysis of where such public hearings would even be held, how arbitrators could ensure safety and order in those settings, or how witnesses could be protected from intimidation and external influence. Public policy is not advanced by replacing a proven, efficient, and secure process with one that is slower, costlier, and fraught with risks to both fairness and workplace relations.

The Illinois AFL-CIO, AFFI, and Council 31 object to the First District's interpretation as fundamentally inconsistent with the legislature's intent and the well-recognized public policy interest in arbitration.

II. The First District's Decision Ignores Clear and Well-Defined Public Policy Against Disclosure of Arbitration Proceedings.

A. Exemptions to Public Disclosure under FOIA.

To vacate a labor arbitration award under public policy, the court must first determine there is a strong public policy and then determine if the arbitrator's award violated the public policy. *American Federation of State, County and Municipal Employees, AFL-CIO v. Department of Central Management Services*, 173 Ill.2d 299, 308, 219 Ill.Dec. 501, 671 N.E.2d 668 (1996). In order to determine if there is a strong public policy, the court is to look to the state constitution, statutes and relevant case law. *Id.*

The First District relied on the FOIA statute to support its conclusion that private arbitration violated public policy. *Chicago John Dineen Lodge No. 7 v. City of Chicago; The Department of Police; Brandon Johnson, in His Official Capacity as Mayor; Larry Snelling, in His Official Capacity as Superintendent of the Chicago Police Department; and the Chicago City Counsel*, 2025 IL App (1st) 240875, ¶ 81. However, the Court looked at certain provisions of FOIA in a vacuum to the exclusion of all other provisions of the Act, namely the catalogue of FOIA exemptions. Specifically, the First District cited FOIA's opening declaration that all persons are entitled to "full and complete information regarding the affairs of government and the official acts and policies of those who represent them," emphasizing that such access is necessary for informed public debate, political judgment, and monitoring government to ensure it serves the public

interest. 5 ILCS 140/1. In focusing on the general statement of interest in the opening lines of FOIA, however, the First District ignored the explicit exemptions from public disclosure of adjudication of employee grievances. The General Assembly could not have been clearer that “[r]ecords relating to a public body’s adjudication of employee grievances or disciplinary cases,” prior to the final outcome, were protected from disclosure under FOIA. 5 ILCS 140/7(n).

This exemption reflects a legislative judgment and a clear and well-defined public policy that the “adjudication of employee grievances” (i.e. the grievance process including final and binding grievance arbitration) is not subject to disclosure under FOIA. The privacy of the grievance adjudication process, including the arbitration hearing, is a bedrock tenant and foundational element of labor relations law. The arbitration hearing is where an employee’s innocence or guilt of the charges made against them is proven. While admittedly the overall purpose of FOIA is public transparency, the legislature very clearly put certain limits in place to that principle. Rather than considering FOIA in its entirety, the public policy analysis considered only the opening lines of FOIA but did not look any further. The transparency public policy finding in the decision below is wholly inconsistent with the clear and explicit exemption the General Assembly included in the same statute for exact type of proceeding at question in this matter.

To highlight the dangerous precedent set by the Appellate Court in the name of public transparency one need only apply the Court’s logic to any of FOIA’s other numerous exemptions. If an interest arbitrator were to reject a public employer’s proposal that a public employee’s personal information be made publicly available, would that award similarly be vacated under the generalized theme of public transparency despite

the specific exemption for personal information found in 5 ILCS 140/7(c)? If an interest arbitrator were to reject a union proposal that it should be provided the names of any confidential source that reported wrong doing of one of its members, should that award be similarly vacated on the generalized theme of public transparency while ignoring the exemption found in 5 ILCS 140/7 (d)(iv)? Or if an interest arbitrator were to award a Union proposal that despite the exemption found 5 ILCS 140/7 (p), a public employer would have to produce all records relating to collective bargaining, including those created in private meetings, should that award be confirmed because to deny such a proposal would not serve the overarching goal of full public transparency? While these examples may appear on their face to be absurd, they are no more absurd than ignoring the exemption for adjudication of employee grievances found in 5 ILCS 140/7(n).

Furthermore, by ignoring 5 ILCS 140/7(n) the Appellate Court has now created precedent extending far beyond labor relations. If a public policy of transparency can be used to ignore the FOIA exemptions in the collective bargaining context, it can surely be used to ignore any other exemption. Proprietary information would no longer be protected despite the exemptions found in subparts (g), (s) or (y). 5 ILCS 140/7. Preliminary drafts, notes, recommendations, opinions regarding policies, including those of the General Assembly, despite the exemption found in in subpart (f) would no longer be protected from public disclosure. *Id.* Private health information would be open for public consumption despite the exemption found in subpart (ss). *Id.* In short, if the First Appellate Court's decision is allowed to stand, the legislature's carefully drafted protections from public disclosure of certain information would become meaningless.

Taking the First District's logic even further outside of the FOIA context, if "public transparency" can be used to ignore the very clear and specific protections created by the legislature in FOIA, the same logic could be utilized to ignore similar legislative protections created in other statutes. For obvious reasons certain state statutes protect the disclosure of "whistleblowers." The State Officials and Employees Ethics Act exempts from disclosure "the identity of any individual providing information or reporting any possible or alleged misconduct" 5 ILCS 430/20-90(a); 25-90(a); and the Occupational Safety and Health Administration ("OSHA") exempts from disclosure complainant names in workplace safety complaints 820 ILCS 219/70(d). A similar disregard of these protections in the name of public transparency will have a chilling effect that the exemptions were specifically created to prevent. However, taking the First District's public transparency finding to its logical conclusion, one must ask if similar safeguards against public disclosure found in FOIA can be ignored, then why not similar protections in other statute?

B. Exemptions to Public Disclosure under the Open Meetings Act and the IPLRA.

The First District's decision also ignores provisions of the Open Meetings Act ("OMA"), which expressly authorizes closed meetings for discipline matters. (5 ILCS 120/2(c)(1)). OMA, like FOIA, contains a general statement that the public has a right to be informed as to how public bodies conduct their business and that deliberations and actions of public bodies be taken openly. (5 ILCS 120/1). The exemption in OMA for closed meetings regarding discipline matters was passed by the General Assembly even in light of the Act's intent to "protect the citizen's right to know." (5 ILCS 120/1(1)). Just as the exemption in FOIA was made despite a general interest in transparency. This

further shows that there is a strong public policy for discipline adjudication to not be open to the public.

The OMA exemption is reinforced by the Illinois Public Labor Relations Act (“IPLRA”), which exempts grievance arbitration conducted pursuant to the IPLRA from OMA entirely. 5 ILCS 315/24. This related provision was similarly not addressed the First District’s finding of a general public policy of “transparency.” The General Assembly could not be clearer that grievance arbitration is not meant to be held in a public forum. “The provisions of the Open Meetings Act *shall not apply* to ...grievance arbitration, pursuant to this Act.” *Id.* (emphasis added). It is through the IPLRA that all public employees, have the right to collectively bargain and the right to grievance arbitration. The First Circuit’s ruling has implications for all public employees who work under the rights granted to them by the IPLRA. The singular focus on the opening sentence of FOIA has resulted in the elevation of a generalized notion of “public transparency” over many other significantly more well-defined public policies protecting against public access to arbitration proceedings. If allowed to stand, this ruling threatens to expose the release of the very categories of information the General Assembly repeatedly determined must remain confidential.

The Illinois AFL-CIO, AFFI, and Council 31 must object to this reading by the First District due to its jeopardizing of confidentiality and privacy-related exemptions and exceptions contained in Illinois statutes related to employment.

III. The First District’s Decision is Based on a Faulty Premise

The First District’s reasoning that employee misconduct hearings must be public to further the “exposure of crime” is frankly offensive and deeply misguided. It

effectively equates an allegation of public employee workplace misconduct with evidence of criminal behavior, thereby condemning public employees before a single piece of evidence is heard or evaluated. Such reasoning collapses any distinction between unproven accusations and actual misconduct. Taken to its logical conclusion, the same rationale would brand teachers accused of misconduct as child predators, or firefighters facing disciplinary charges as arsonists, or any public employee with cash handling responsibility as thieves, regardless of whether those allegations have any merit. Public servants, especially those who dedicate their careers to protecting communities and often put their lives on the line, should not be presumed criminals merely because a complaint of work place misconduct has been alleged. That public forum simply is not grievance arbitration. This logic not only undermines the presumption of innocence, a cornerstone of due process, but also erodes public trust by conflating potential discipline with criminality. If there is truly a criminal infraction involved, there is a public forum for adjudication of that issue.

The Illinois AFL-CIO, AFFI, and Council 31 must object to this flawed interpretation by the First District because it jeopardizes both the integrity of the arbitration process and the fundamental due process protections that all public workers are entitled to expect.

IV. The First District's Decision Is Arbitrary

The Lodge and the City of Chicago's CBA provides that challenges to suspensions up to 365 days are resolved through a private grievance arbitration process. *Id.* The record does not include evidence that either party proposed modifying the parties' agreement that suspensions of 365 days or less be resolved through a private grievance

arbitration process. Consequently, the First District compounded its error by creating an entirely arbitrary distinction between disciplinary outcomes lasting longer than 365 days and those of even a single day or less. Under its reasoning, suspensions or separations of 365 days or more are automatically subject to a public hearing, while a suspension of 364 days remains a private proceeding. This bright line has no basis in any statute, case law, or recognized policy objective. The result is both illogical and harmful: two nearly identical disciplinary cases, differing only by the span of one day, would be treated in radically different ways, with one remaining protected and the other forced into the public eye. By doing so, the decision undermines the fairness owed to employees, erodes the integrity of the arbitration process, and destabilizes the balance carefully struck between transparency and privacy in Illinois law.

For these reasons, the Illinois AFL-CIO, AFFI, and Council 31 must object to the First District's reading.

CONCLUSION

For the foregoing reasons, and for the reasons stated in the briefs of the Appellant and the various *amici* supporting the Appellant, the Illinois AFL-CIO, AFFI, and Council 31 respectfully requests that this Court grant the Petition for Leave to Appeal and on the merits reverse the First District's decision in this matter.

Dated: February 4, 2026

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CERTIFICATE OF COMPLIANCE

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 13 pages and 3528 words.

/s/ Margaret Angelucci
Margaret Angelucci

CERTIFICATE OF SERVICE

I, Margaret Angelucci, attorney for Illinois AFL-CIO, AFFI, and Council 31, certify that I electronically filed via Odyssey eFile IL the foregoing Brief of Amicus Curiae Illinois AFL-CIO, AFFI, and Council 31 CIO in Support of Petitioner Chicago John Dineen Lodge No. 7 Appeal with the Clerk of the Supreme Court on the 4th of February, 2026.

The undersigned further certifies that on the February 4, 2026, an electronic copy of the foregoing Brief is being served to counsel of record at the email addresses below:

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Under penalties as provided by law pursuant to § 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this instrument are true and correct.

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