



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

Lisa Madigan  
ATTORNEY GENERAL

October 25, 2010

Carrie Dick  
FOIA Officer  
Village of Lincolnwood  
6900 N. Lincoln Avenue  
Lincolnwood, Illinois 60712

RE: FOIA Pre-Authorization Request - 2010 PAC 9140

Dear Ms. Dick:

We have reviewed the Village of Lincolnwood's pre-authorization request and associated documents concerning [REDACTED] Freedom of Information Act ("FOIA") request. Specifically, on July 28, 2010, [REDACTED] requested (1) "Photo Red Light Enforcement Program (Service) Agreement between A-TS and the Village of Lincolnwood" and (2) "Violation Processing Service Agreement (Business Rules) between A-TS and the Village of Lincolnwood." The Village denied [REDACTED] request in part; it claims that the Business Rules are exempt under Section 7(1)(f) of FOIA. 5 U.S.C.S. 407(1)(f).

On August 25, 2010, we concluded that further inquiry was warranted, and directed the Village to provide us with the withheld information along with a detailed explanation as to why it contends that the information falls within the purview of Section 7(1)(f).

Section 7(1)(f) exempts from inspection and copying "preliminary drafts, notes, recommendations, memoranda and other records in which opinions are expressed, or policies are formulated, except that a specific record or relevant portion of a record shall not be exempt when the record is publicly cited and identified by the head of the public body." *Id.*

We conclude that Section 7(1)(f) exempts the Business Rules from public disclosure. This information expresses opinions and formulates policies, and also is in draft form. Finally, the Business Rules have neither been publicly cited nor identified by the head of the Village.

If you have any questions concerns, please contact me at (312) 814-5044. This correspondence shall serve to close this matter.

Sincerely,

Cara Smith  
Public Access Counselor

By:



Sunil Bhawe  
Assistant Attorney General

cc:



9140 pre-auth al 7(1)(f) prelim draft mun

