

THE RUTHERFORD INSTITUTE

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JOHN W. WHITEHEAD
Founder and President

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August 27, 2019

Via Certified Mail

Illinois Secretary of State
Executive Counsel
17 N. State Street
Ste. 1179
Chicago, Illinois 60602

Re: Freedom of Information Act Request / Dmitry Feofanov

Dear Sir or Madam:

The Rutherford Institute, a non-profit civil liberties organization, has been asked by Illinois Resident, Dmitry Feofanov, to submit on his behalf the following request for records and other information pursuant to the Illinois Freedom of Information Act (FOIA), 5 Ill. Comp. Stat. 140. Pursuant to FOIA, we provide the following information:

Requester's Name: Dmitry Feofanov

Company: ChicagoLemonLaw.com, P.C.

Address: 404 4th Avenue West

City, State, Zip: Lyndon, IL 61261

Records Sought:

1. Any and all documents or records of the Illinois Secretary of State (SoS) or the Illinois Department of Motor Vehicles (DMV) relating or pertaining to the disclosure to any agency, department or instrumentality of the United States government of photographs of Dmitry Feofanov obtained or kept by the SoS and DMV in connection with a driver's license issued by the State of Illinois to Dmitry Feofanov;

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2. Any and all documents or records of the SoS or DMV relating or pertaining to the disclosure to any agency, department or instrumentality of state other than Illinois of photographs of Dmitry Feofanov obtained or kept by the SoS and DMV in connection with a driver's license issued by the State of Illinois to Dmitry Feofanov;

3. Any and all documents or records relating or pertaining to the authority, whether under statute, regulation or executive order, of the SoS or DMV to disclose or provide to any other federal or state governmental entity photographs obtained by the SoS or DMV in connection with the issuance of Illinois drivers' licenses.

This request seeks any and all records, reports, forms, writings, letters, memoranda, books, papers, maps, photographs, cards, tapes, recordings, electronic data processing records, recorded information and all other documentary materials, regardless of physical form or characteristics, prepared, possessed or under the control of the SoS and/or DMV

The response to this request should be sent to the undersigned at:

P.O. Box 7482
Charlottesville, Virginia 22906-7482
legal@rutherford.org

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Whitehead". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John W. Whitehead, President

Cc: Dmitry Feofanov, Esq.