Legal INSIGHTS
Ottosen DiNolfo Hasenbalg & Castaldo, Ltd.
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Open Meetings in the Digital Age: The First Amendment, Video Recordings, and Facebook Comments

by W. Anthony Andrews and Megan Lamb

With multiple social media outlets conveying public meetings, governmental bodies are faced with new dilemmas on many fronts. For instance: when can a governmental body delete an "offensive" public comment without violating the First Amendment? Recently, a federal court tackled this issue in *Anderson v. Hansen*, 519 F. Supp. 3d 457 (E. D. Wis. 2021).

Heidi Anderson's children were enrolled at Elmbrook School District in Wisconsin. In August of 2020, Anderson attended a meeting of the District's Board of Education to express her views on the District's COVID-19 safety protocols. While speaking during the video-recorded public comment period of the meeting, she objected to six-foot social distancing measures and masking requirements for students. Anderson then went on to address one of the Board members, Dr. Mushir Hassan—a physician and the District's medical liaison. She stated that she did not believe Hassan was the "right choice" to be the District's medical liaison, since he served as a "leader in the Islamic community." Anderson further objected to Hassan's political leanings and stated that, since her children are Christian, they should not be forced to wear face coverings "any more than children who are Islamic or Muslim should be forced to, as you've put it, 'be subject to the American style sexualization of children,' and have to wear less clothing than you're comfortable with your children wearing."

In response to Anderson's comments, the District banned her from its property unless she received permission in advance. The District also condemned Anderson's actions and stood by Dr. Hassan. The District then removed (1) the portions of her public comment that concerned Dr. Hassan from a video of the meeting that had been posted to YouTube, and (2) the comments she left on the District's Facebook page where she attempted to defend herself against public backlash.

Anderson filed a federal lawsuit alleging that her First Amendment right to free speech had been violated by the District. Broadly speaking, the First Amendment prohibits governments—including local governments—from suppressing a citizen's speech based on its content. For example, a public body cannot prohibit an individual from speaking at its public meetings because the body does not agree with the speaker's message.

Seizing on this, Anderson claimed the District's choice to ban her from District property, the District's removal of portions of her comments from video of the meeting, and the District's removal of her comments from the District Facebook page were violations of her First Amendment rights.

The court granted a preliminary injunction against the ban. In response, the District rescinded Anderson's ban and filed a motion to dismiss the case. The court found that the District acted constitutionally when it edited the meeting's video footage, but found that the District may have wrongly edited her Facebook comments.

The YouTube Video

Anderson attempted to argue that the District's decision to edit her out of the meeting's video recording was a violation of her First Amendment rights. However, the court disagreed—the District's decision to edit the video was constitutional. This was because a mere recording is not "private speech" protected by the First Amendment. Instead, it is just a record of prior speech that occurred during the public forum. As a result, the District was not

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Open Meetings

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unconstitutionally suppressing Anderson's "speech" at all.

Additionally, the court found the District actually had a First Amendment right of its own to delete portions of Anderson's comments from its video. The court pointed out that the District's choice to alter the video was an "expressive act," as the District did not condone Anderson's comments. Because "[a] government entity is free to speak for itself, to say what it wishes, and to select the views that it wants to express," there was no First Amendment violation.

The Facebook Comments

However, the District's choice to delete Anderson's Facebook comments was potentially unconstitutional. By choosing to allow comments on the District's Facebook page, the District was required to tolerate whatever comments were left there. As the court put it, "the District allowed members of the public to write their own comments underneath the post" about Anderson's comment and the District's responsive letter "and to carry on discussions with one another." Although the District "was not required to create this forum for public discussion, once it did so, it could not exclude speakers on the basis of viewpoint." Stated differently, the District could not delete Facebook comments it simply disagreed with. Taking as true Anderson's allegations that the District suppressed her speech in a public forum, the court found a potential constitutional problem and allowed Anderson's claim to proceed.

The Takeaway

A public body must use caution if it chooses to use social media to communicate with residents. If a government does not wish to live with adverse comments, its best option is to prohibit all public comments in the first place. If it does otherwise, residents are free to make statements whether their viewpoint aligns with that of the public body or not. However, a public body can modify its own recordings.

If you have any questions about how the First Amendment impacts your locality, we recommend you contact one of our attorneys.

U.S. Supreme Court to Hear Two Higher Education Affirmative Action Cases

by Joseph Miller III and Hayley Loufek

In January 2022, the United States Supreme Court decided to hear two cases challenging the use of affirmative action policies in university undergraduate admissions. The cases were brought by the same plaintiff: Students for Fair Admissions, Inc. ("SFFA"). SFFA is a 501(c)(3) nonprofit with over 22,000 members, some of whom are applicants who applied and were denied admission to Harvard and the University of North Carolina. SFFA is seeking in *SFFA v. President & Fellows of Harvard College* (hereinafter, "*Harvard*") and *SFFA v. University of North Carolina* ("*UNC*") for the Court to overturn its 2003 decision in *Grutter v. Bollinger* and 2016 decision in *Fisher v. University of Texas*, which held that universities can consider race as a factor for admission with certain caveats. The Court's decision to hear these cases suggests that it may be willing to reconsider whether race-conscious admissions policies are constitutional.

In *Grutter* and *Fisher*, the Court decided that, in the context of higher education, race-conscious admissions policies should undergo a form of judicial review known as "strict scrutiny." This requires the policy to further a compelling government interest and be narrowly tailored to achieve that interest. The Court found that student body diversity is a compelling interest that justifies the consideration of race in admissions, which satisfied the first prong of strict scrutiny.

However, to be narrowly tailored, the admissions policy cannot seek to reach a racial quota or establish racial balancing by specific numbers. It is also impermissible for higher education institutions to consider race in a "mechanical" way; race can be used as a "plus" factor in making a student more admissible, but it cannot boost their applications by a predetermined amount. Otherwise, race becomes the deciding factor in their admission, which is prohibited.

The Court's recent decision to hear *Harvard* and *UNC* may signal that a change is coming to this framework.

In *Harvard*, SFFA alleged that Harvard's race-conscious admissions process discriminated against Asian American applicants in favor of white applicants. Harvard uses a list of "tip" factors that can be considered at multiple stages throughout the admissions process which might tip an applicant toward admission to Harvard. Race is considered in these tip factors, as is athletic ability, legacy status, capacity for leadership, and several other factors. The district court reviewed Harvard's multi-step, holistic admissions process, as well as whether race-neutral alternatives might allow Harvard to achieve its diversity goals. It also examined statistical and non-statistical studies examining whether Asian-American students are disadvantaged by Harvard's admission process. It determined that Harvard did not engage in racial balancing, did not use race as a mechanical tipping factor, had no workable race-neutral alternatives, and did not intentionally discriminate against Asian Americans. The appellate court agreed, but that ruling is subject to modification by the Supreme Court.

In *UNC*, SFFA similarly alleged that UNC's admission policy discriminated against some of its members based on their race, color, or ethnicity. Specifically, SFFA claimed that UNC's policy does not consider race as merely a "plus" factor—instead, it uses racial preferences when race-neutral alternatives are available. Students apply to UNC via the Common Application, which includes optional fields for an applicant to give information about their race and ethnicity. Students also have the option to include additional information with their application beyond what UNC requires. But if a student self-discloses their race or ethnicity, application readers are trained to consider race or ethnicity as one factor of many during a holistic review of the applicant.

The district court decided that there were triable issues of fact that a jury should hear for each count in SFFA's complaint, such that neither party was entitled to judgement as a matter of law. The case was appealed to the Supreme Court so that it could answer the legal questions of (1) whether the Court should overrule *Grutter* and hold that institutions of higher education cannot use race as a factor in admissions; and (2) whether a university can reject a race-neutral alternative because it would change the composition of the student body, without proving that the alternative would degrade academic quality or the educational benefits of student body diversity.

The Supreme Court will likely hear arguments for these cases in its next term, which begins in October 2022. A decision is expected in spring or summer of 2023.

Court Rules Police Officer's Widow Must Wait Until Her Late Husband's Sixtieth Birthday to Collect a Survivor's Pension

by Carolyn Welch Clifford

In a case of first impression, an Illinois Appellate Court recently determined that the surviving spouse of a former police officer who had separated from service but had remained a deferred pensioner at the time of his death was not entitled to draw surviving spouse benefits until the former police officer's sixtieth birthday.

In *Thornley v. Board of Trustees of the River Forest Police Pension Fund*, 2022 IL App (1st) 210835, Michael Thornley began working for the River Forest Police Department in 1997. Michael married Carrie in 2004, and resigned from the police department in 2015 after 18 years of service. At the time of his resignation, he was a "deferred pensioner" with enough creditable service to qualify for a retirement pension at age sixty.

However, Michael died in 2018 before reaching sixty and without drawing a retirement benefit. If he had reached the age of sixty, he would have been eligible for a retirement pension benefit of 42.5% of his applicable pension salary.

After Michael's death, Carrie applied for a surviving spouse benefit under Section 3-112 of the Illinois Pension Code (40 ILCS 5/3-112). The critical portion of Section 3-112(a) provides:

> Upon the death of a police officer entitled to a pension under Section 3-111, the surviving spouse shall be entitled to the pension to which the police officer was then entitled. (40 ILCS 5/3-112(a))

Carrie argued that the triggering event for payment of a pension benefit to her was the death of her husband and that she was entitled to begin receiving the benefit as of the date of his death. The Board, however, argued that Carrie was not entitled to begin drawing the survivor's benefit until the date Michael would have been entitled to begin drawing his deferred retirement benefit: when he turned age sixty in December of 2032. Carrie appealed.

The court ultimately found that the triggering event for survivor benefits is not simply "upon the death" of the former police officer. Rather, the statute provides for survivor benefits "upon the death of a police officer *entitled to a pension*" and based upon the pension "to which the police officer *was then entitled*." In this instance, the former officer was not entitled to a retirement pension at the date of his death. Rather, his retirement benefits were to begin in December 2032 when he turned sixty.

In short, the court agreed with the Board that the surviving spouse "inherits whatever [the deceased officer's] pension rights were, whenever they were payable." The court thus concluded that the Board's interpretation of Section 3-112(a) was consistent with legislative intent to defer pension in these situations.

Furthermore, the court reviewed and dismissed as unpersuasive an opinion that had been issued by the Illinois Department of Insurance as an Advisory Opinion on December 14, 2018. In that opinion, the DOI misquoted the statute and concluded that the "plain meaning" of the statute entitled the surviving spouse to benefits immediately upon the death of the police officer.

Note that for a deferred firefighter's surviving spouse, the language found in Section 4-114 (applicable to firefighters) is different from Section 3-112. Under the facts presented by the *Thornley* case, if a deferred Tier I former firefighter with 18 years of creditable service died prior to reaching age sixty, then his or her surviving spouse would receive a surviving spouse benefit of 54% of the monthly salary as of his or her last day in service which would be paid upon the death of the deferred former firefighter (40 ILCS 5/4-114(a)(1)).

IDPH Emergency Rules Roundup

by Stephen H. DiNolfo

The Illinois Department of Public Health ("IDPH") recently adopted a smattering of emergency rules that impact EMS licensure and hospital bypass. 77 Ill. Admin. Code § 515. Below is a roundup of those changes.

First, as of December 27, 2021, EMS personnel with an unencumbered certification in the National Registry of Emergency Medical Technicians as an EMT, Advanced EMT, or Paramedic may serve in an Illinois EMS system under provisional status until they receive an Illinois license. 77 Ill. Admin. Code § 515.610(f).

Second, volunteer EMS agencies in rural populations (*i.e.*, those with 5,000 or fewer inhabitants) can create a credentialing exception to allow registered nurses, physician assistants, and advanced practice nurses with valid licenses to serve as volunteers who perform the same work as EMTs after completing certain requirements like completing twenty hours of continuing education in areas like airway management, prehospital cardiac and trauma care, ambulance equipment and operation, and completing eight hours of observation riding time. 77 Ill. Admin. Code § 515.830(l).

Third, the emergency amendments have changed the procedure for a hospital to go on bypass status. Hospitals must receive prior approval from the IDPH to go on bypass status during a local or state disaster. When seeking approval, a hospital must provide information to the IDPH about current bed status, submit proof that surge plans have been implemented, and show the hospital's peak census policy have been implemented three hours prior to the request to go on bypass. Hospitals must also supply information pertaining to patient wait times, the number of patients waiting to be seen, the number of beds that cannot be staffed, the percentage of currently occupied beds, the number of potential in-patient discharges, and the number of open ICU beds. The IDPH Regional EMS Coordinator will review requests with respect to the status of other hospitals in the region and approve or deny requests within two to four hours. 77 Ill. Admin. Code § 515.315(f).

A request for bypass status may not be honored if three or more hospitals in the geographic area are also on bypass status or if the transport time for an ambulance to reach the nearest facility in the regional bypass plan will exceed fifteen minutes. The decision to go on bypass status must be based on lack of essential resources for a type or class of patient, such as unavailability of staff or unavailability of essential diagnostic equipment. All reasonable efforts to resolve the limitations on resources must have been exhausted, such as cancellation of elective procedures and unsuccessful efforts to call in off-duty staff. Hospitals must perform constant monitoring to determine when bypass status can be lifted. 77 Ill. Admin Code § 515.315(c-d).

Additionally, trauma centers must now have at least one Registered Professional Nurse with a current trauma nursing certification available to care for trauma patients. These emergency amendments are designed to allow the IDPH to closely monitor bypass status of hospitals and allow EMS staff to be immediately notified of hospital bypass status. This will help ensure patients in critical condition are transported to the closest hospital and that multiple hospitals in the same area are not on bypass simultaneously. These amendments will also address EMS personnel shortages.

Fourth, IDPH has updated the necessary criteria for ambulance design according to the National Fire Protection Association, Ground Vehicle Standards for Ambulances, and/or the Federal Specifications for the Star of Life Ambulance. 77 Ill. Admin. Code § 515.830(a). Furthermore, ambulance providers can request approval from the IDPH to use an alternative staffing model for interfacility transfers for up to one year, according to the requirements for vehicle service providers. 77 Ill. Admin. Code § 515.830(k).

IDPH's emergency rules are set to expire within 150 days of their effective date, which is approximately May 26, 2022.

Handling the Updated Statements of Economic Interest

by Michael Castaldo, Jr.

As we recently reported in a *Client Alert*, the annual Statement of Economic Interests form required to be filed by public officials has changed. This Article details what has changed and how to navigate the newly updated Statements.

The Illinois Governmental Ethics Act requires certain elected public office holders, candidates, officials, and employees to file a "Statement of Economic Interest." This requirement applies to all elected officials and candidates for elected office, all appointed members of a governing or zoning board, and all appointed members of boards or commissions with authority to authorize expenditure of funds. Certain government employees must also fill out a Statement if they are compensated for their services and are (or function as) the head of an administrative unit, have direct authority over contracts of $1,000 or more, have authority to approve licenses and permits, who adjudicate, arbitrate, decide, or review a judicial or administrative proceeding, who have authority to issue and adopt rule and regulations, or who supervise twenty more employees. Pension board members are also required to file a Statement.

Each local government must notify their local county clerk of the individuals who are required to file the form by February 1 of each year. The forms may differ slightly depending on locality.

Previously, the Statement of Economic Interest form required filers to list information about the following: a professional organization or individual professional practice from which the filer derived income in excess of $1,200 the preceding year; the nature of professional services rendered and the nature of the entity to which they were rendered (other than the government entity requiring the person to file) if the filer received over $5,000 in fees from the entity; capital assets which realized a gain of $5,000 or more; ownership interests held by the filer in entities doing business with the State of Illinois or the unit of local government requiring the individual to file if the interest was over $5,000 fair market value; and sources of income over $1,200 to the filer from entities that do business with the State of Illinois or the unit of local government requiring the individual to file.

Recently, however, the Illinois legislature enacted Public Act 102-0664, which requires additional financial interests to be disclosed in a Statement of Economic Interest. As of January 1, 2022, individuals who are required to file must now disclose the following:

- Assets valuing more than $10,000 held individually or jointly with a spouse or minor child(ren);
- Assets in trust regardless of whether distributions have been made; sources of income in excess of $7,500 annually for the filer and spouse (excluding the income from the position that mandates the filing of the Statement);

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With Gratitude, Ottosen DiNolfo Reflects Upon its Thirty Years

In March of 1992, with not much more than the prospect of a few clients and a passion for the practice of municipal and school law, we founded a firm then called Ottosen Sinson & Trevarthen, Ltd. The impetus for the firm's formation was addressing the request of clients that fire protection districts receive legal services from attorneys who had the same passion for and commitment to public service as they held. While initially focused on fire districts, labor law, and representation of school districts, the firm rapidly expanded its scope to municipal and other units of local government.

Over the past 30 years our firm has diversified and is now Ottosen DiNolfo Hasenbalg & Castaldo, Ltd. Our practice continues to grow and thrive, as the firm enters its thirty-first year in business with over 400 local governmental clients and a strong practice in multiple areas of law including: formation, merger, acquisition, and sales of private corporations and farms, general corporate issues for business entities, estate planning, probate, tax, and litigation on behalf of corporations and many diverse governmental entities.

Our success is not only measured by the number of years we have practiced law; it is measured by the lasting relationships we have built with clients and the individuals who are responsible for leading or governing them. As we have strived to make private clients and governmental corporations work more effectively and efficiently, we have learned a great deal from clients who ensure their businesses and communities are progressing, prosperous and protected. For our clients who have entrusted us to provide legal advice—particularly those who have been with us for decades—we thank you for helping us achieve this milestone in the firm's history.

It is imperative I recognize those responsible for the firm's success. Thank you to our attorneys and excellent staff, whether present or past, who have been and are the firm. We look forward to continuing this remarkable journey together. We are grateful for the many relationships fostered and cannot adequately describe the benefits we have received in the representation of our clients and the wonderful personal relationships created while doing so.

Karl R. Ottosen

Illinois Supreme Court Clarifies Reach of the Biometric Information Privacy Act in the Workplace

by Craig D. Hasenbalg

On February 3, 2022, the Illinois Supreme Court decided that employees can sue their employers for allegedly violating the Biometric Information Privacy Act ("BIPA") (740 ILCS 14/1 *et seq*.)—even despite the Workers' Compensation Act's limits on employee claims. As a result, employers should vigilantly ensure compliance with BIPA.

The Illinois legislature recognizes that, unlike other identifiers like a social security number, biometric information is unique to an individual and cannot be changed if compromised. So, the General Assembly found that regulation of the collection and use of biometric information is a strong public concern and subsequently enacted BIPA.

In a nutshell, BIPA requires private entities—like employers—in possession of a biometric identifier (*e.g.*, retina/iris scans, fingerprints, voiceprints, or scans of face or hand geometry) to develop a written policy that establishes how long that biometric information will be kept and eventually destroyed. Additionally, private entities must inform individuals that their biometric information is being collected and tell them why. Significantly, private entities also have to receive written release for collecting the information from the subject.

BIPA also restricts entities from (1) collecting biometric information (2) selling, leasing, trading, or (3) profiting off of the information or otherwise disclosing the information without the consent of the subject. Some exceptions exist if the disclosure is required by law or pursuant to a warrant or subpoena.

In *McDonald v. Symphony Bronzeville Park, LLC*, plaintiff Marquita McDonald alleged that her employer (Bronzeville) violated BIPA by using a finger-print scanning system to track employees' time without providing its employees with the opportunity to consent to the system. 2022 IL 126511. McDonald further alleged that she and her fellow employees had never been informed of the purpose or length of time for which the information would be stored. She subsequently filed a class action lawsuit against Bronzeville claiming that it had violated its employees' rights to privacy under BIPA.

Bronzeville creatively argued that McDonald's claims were barred by Illinois' Workers Compensation Act because her alleged injury occurred in the course of her employment and therefore needed to be adjudicated before the Illinois Workers' Compensation Commission.

The Workers' Compensation Act represents a compromise between employers and employees. On one hand, it provides a remedy for employees who suffer an accidental injury at work. Specifically, employers are liable for any on-the-job injury—with or without fault—so employees can receive prompt compensation without the expense and time of litigation. On the other hand, damages are awarded based on a pre-determined fee schedule, and employees are prohibited from bringing other lawsuits against the employer. The latter feature is found in Sections 5(a) and 11 of the Compensation Act, which are known as its "exclusivity provisions."

Importantly, the exclusivity provisions are not absolute. An employee is not barred from suing their employer if they can prove that the injury was not accidental, did not arise from their employment, was not received during the course of employment, or was not compensable under the Compensation Act.

Ultimately, the Illinois Supreme Court decided that the Compensation Act did not preclude McDonald's BIPA claim for at least two reasons.

First, the purpose of the Compensation Act is to provide financial assistance to injured employees until they can return to work. The injuries that the Act covers, therefore, are those that impact an employee's capacity to perform their work-related duties. The type of injury is critical; it must be one that diminishes an employee's earning power. The type of injury to one's privacy (as recognized under BIPA) is different from the physical or psychological harms that workers' compensation is

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Economic Interest

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- The transaction date of a sale or transfer that resulted in capital gains in excess of $7,500; creditors of a debt in excess of $10,000 owed by the filer or jointly with a spouse or minor child(ren);
- The name of the unit of government for which the filer or spouse was an employee, contractor, or office holder not including the position for which the Statement is being filed;
- Names of lobbyists who have an economic relationship with or are a family member of the filer; and
- The source and type of gifts, individually or in the aggregate, in excess of $500 in the preceding year.

Importantly, the Act does not require the filer to disclose the specific dollar amounts or values of the financial interests reported. Campaign receipts do not need to be included in the Statement.

Additionally, the old Statement required disclosure of the source of gifts valuing over $500, while the new form requires information about the source and the type of gift. The older version required disclosures about a filer's economic associations with compensated lobbyists. Now, filers must include this information as well as if a member of the filer's family is a government lobbyist. The new form also requires information about the filers spouse and their employment in government, which was not previously required.

The new amendments to the Ethics Act also provide definitions of what constitutes an "asset," "creditor," "debt" and other helpful clarifications for individuals who are required to file a Statement. For example, an "asset" is now defined to include stocks, bonds, sector mutual funds, sector exchange traded funds, commodity futures, investment real estate, beneficial interests in trusts, business interests, and partnership interests. But, personal residences, vehicles, savings/checking accounts, securities issued by branches of government, Medicare benefits, inheritances, annuities, pensions, retirement accounts, and college savings plans are not assets.

The Statements of Economic Interests must be filed by May 1 of each year (May 2 for 2022). Certification of review by an ethics officer is required for State of Illinois officials, but that requirement does not extend to local officials unless a local ordinance or policy provides otherwise.

Compliance with the filing deadlines is important. If a covered individual does not file a Statement of Economic Interests by May 1, they will be subject to late filing fees. In certain cases, the intentional failure to file can result in forfeiture of the individual's office or employment. Additionally, it is imperative to complete these forms accurately—any person who willfully files a false or incomplete statement may be guilty of a Class A misdemeanor. 5 ILCS 420/4A-107.

With these changes, it is imperative to take care in completing a Statement of Economic Interest. If you have any questions, we recommend you partner with your attorney.

Biometric Information

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designed to remedy. Thus, a BIPA violation is not an injury that is compensable under the Compensation Act. As a result, an employee's BIPA claim is not precluded by the Compensation Act's exclusivity provisions.

Second, BIPA was enacted after the Compensation Act and its language evinces the legislature's intent that it provide a remedy for employees. As a rule, later statutes supersede earlier ones, giving BIPA the final word over the Compensation Act. BIPA defines the "written release" that collectors of biometric information are required to obtain as "written consent or, *in the context of employment*, a release executed by an employee as a condition of employment." The legislature was clearly aware that BIPA violations might arise in the context of employment and intended for employees to have a remedy.

Moving forward, employers must be aware that employees can sue them under BIPA notwithstanding the Compensation Act's exclusivity provisions. Employers should therefore take care to comply with BIPA when they collect and use employees' biometric identifiers.

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