Legal INSIGHTS
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Born From Conflict: Introducing the Foreign Fire Insurance License Fee Act

by Shawn P. Flaherty

A local dispute concerning expenditures between the City of Crystal Lake and its Foreign Fire Insurance Board ("FFIB") has resulted in the Foreign Fire Insurance License Fee Act (65 ILCS 5/11-10-0.01), first effective on January 1, 2022. The Act applies to municipal foreign fire insurance boards and limits the ability of municipalities to regulate or otherwise control the operations of a FFIB.

Background

Section 11-10-1 of the Illinois Municipal Code calls for municipalities and fire protection districts to assess a "tax or license fee" by ordinance against foreign fire insurance issuers "in a sum not exceeding 2% of the gross receipts received from fire insurance upon property situated within the municipality or district." 65 ILCS 5/11-10-1. Historically, these amounts have been collected by the Illinois Municipal League or another third-party organization and forwarded to the corresponding municipality or fire district for use by the FFIB.

Illinois law dictates that these expenditures must be used "for the maintenance, use, and benefit of the department" and the FFIB is required to adhere to other legal, financial, and rulemaking obligations set by statute.

In 2017, the City of Crystal Lake and its FFIB came to a dispute over the City's suspension of the collection of foreign fire insurance taxes against insurance companies. This followed another argument between the City and FFIB concerning the propriety of certain FFIB expenditures. Ultimately, the McHenry County circuit court upheld the right of the City to not levy this tax, and the FFIB was legally unable to compel the City to assess it. The circuit court also held that the FFIB lacked legal capacity to sue or be sued and the individual members and Firefighters' Union had no standing to bring suit against the City. *See also City of Crystal Lake Fire Rescue Department Foreign Fire Insurance Tax Board et al. v. City of Crystal Lake*, 2020 IL App (2d) 190956-U.

The Foreign Fire Insurance License Fee Act

In reaction to the Crystal Lake lawsuit, the General Assembly passed the Act. Among other things, the Act prohibits municipalities and fire districts from prescribing the foreign fire insurance license fees by ordinance; rather it is now set at 2% of gross receipts and it is payable to the treasurer of the FFIB or secretary of the fire protection district. 65 ILCS 5/11-10-1(a). The Act also gives FFIB express authority to bring legal action to recover funds against insurance companies and the third parties that owe or collect the fees, and FFIBs may file suit in the circuit court to enforce these actions. 65 ILCS 5/11-10-1(b).

FFIBs are now empowered to establish, manage, and maintain an account for the holding and expenditure of funds paid, and FFIBs are further permitted to contract for the payment of good and services using these funds, including accounting, auditing, legal and collection services. 65 ILCS 5/11-10-2. FFIB members are no longer required to be bonded by the municipality.

Disputes between the Fire Chief and other FFIB members concerning the maintenance, use, and expenditure of funds are to be resolved through binding arbitration as set forth in the Uniform Arbitration Act, and arbitration is the exclusive remedy to resolve disputes on these topics. 65 ILCS 5/11-10-2. The circuit courts no longer have jurisdiction over disputes involving whether FFIB expenditures fit within the statutory requirement.

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Illinois "Safe Roads" Amendment Applies to Home Rule Municipalities

by Meganne Trela

The Illinois Supreme Court recently held that an Illinois constitutional amendment preventing municipalities from using transportation-related tax revenues for non-transportation purposes applies to home rule municipalities in *Illinois Road and Transportation Builders Association v. County of Cook*, 2022 IL 127126 (April 21, 2022).

The amendment, known as the "Safe Roads Amendment," was adopted by nearly 80% of Illinois voters in 2016. It requires that money generated from taxes, fees, excises, and license taxes on transportation infrastructure or operations may only be spent on transportation purposes.

Cook County, a home rule unit of government, had traditionally placed revenues generated from its gas and wheel taxes into its public safety fund. Several public construction and design firms filed suit requesting declaratory and injunctive relief. The associations alleged that their members were missing out on significant transportation projects because of Cook County's practices. Cook County filed a motion to dismiss alleging that the associations lacked standing to bring the lawsuit and arguing that the plaintiffs failed to state a violation of the constitutional amendment.

In making its argument, Cook County relied on Article VII, Section 6(a) of the Illinois Constitution which provides:

> [A] home rule unit may exercise any power and perform any function pertaining to its government and affairs including, but not limited to, the power to regulate for the protection of the public health, safety, morals and welfare; to license; to tax; and to incur debt.

Because the Safe Roads Amendment did not specifically limit the home rule powers of Cook County, Cook County argued that it did not have to comply with the Amendment and could place transportation revenues into the public safety fund. The circuit court agreed with both arguments.

On appeal, the First District Appellate Court also found the plaintiffs failed to show that the Safe Roads Amendment was violated. In both the circuit court and appellate court, Cook County successfully argued that

to limit home rule powers, the limitation needed to appear under Section 6(a) of Article VII. In addition, Cook County argued that the ballot summary prepared by the Secretary of State disclaimed any limitation on home rule powers and legislative debate indicated there was no intent to restrict home rule powers.

Then, the plaintiffs appealed to the Illinois Supreme Court. Unlike the lower courts, the Supreme Court found that the Safe Roads Amendment *did* apply to home rule units of government. It did so by relying on the plain language of the Amendment, which does not exclude home rule units of government from its scope. Instead, the Amendment specifically references local governments without regard to whether they are home rule. The court went on to reason that home rule powers were not unfettered, and home rule municipalities have always been constrained by constitutional limits on their power.

The high court also rejected Cook County's attempt to rely on extrinsic sources to determine the meaning of the Amendment, like the ballot summary and legislative debates. Because the court determined that the language of the Amendment was clear and unambiguous, the language had to be applied "without resort to further aids of statutory construction." As a result, the court determined that home rule municipalities were bound by the spending constraints in the Safe Roads Amendment and the matter was remanded to the circuit court for further proceedings.

Moving forward, home rule municipalities will need to ensure that the funds they gather through transportation taxes are spent in accordance with the Safe Roads Amendment. If you have a question about home rule powers or the Safe Roads Amendment, contact your attorney.

Born From Conflict

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This legislation also addresses issues not contemplated in the Crystal Lake case. For one, a FFIB can now directly collect foreign fire licensing fees and bypass using the Illinois Municipal League or other third-party collection agents. 65 ILCS 5/11-10-2.5. The Act also limits the ability of home rule municipalities to regulate FFIBs and their ability to assess license fees. 65 ILCS 5/11-10-1(c).

It is noteworthy that, even though the Act only amends the Illinois Municipal Code, it will also apply in part to FFIBs of fire protection districts to the extent that activities of fire district FFIBs were regulated in Section 11-10-1 of the Municipal Code. It is also interesting that this Act removes all references to "foreign fire insurance tax" in favor of "licensing fees." Presumably, this language was inserted to avoid restrictions that might otherwise impede the ability of a FFIB to assess a tax.

The Associated Firefighters of Illinois ("AFFI") have again flexed their muscle in Springfield to obtain legislation that is very friendly to the Union FFIB members at a cost to their employers. The result of the recent FFIB litigation certainly crystallized the AFFI's resolve in advancing this measure to success.

Many details of how the Act will be influential remain to be seen. We would expect that administrative regulations may be issued to add more clarity as to how these changes would be implemented. Until then, if you have questions about how your FFIB is affected following the Act, we recommend you contact your attorney.

Improving School Employment History Reviews Under Faith's Law

byMaureen Anichini Lemon

In August 2021, Governor Pritzker signed "Faith's Law," which was designed to protect children from sexual abuse. The General Assembly recently expanded on Faith's Law via P.A. 102-0702. This Act provides a comprehensive action plan to further the goals contained in Faith's Law by increasing notice requirements related to sexual misconduct by school employees and by augmenting school employment history review processes. The Faith's Law expansion makes many changes that will go into effect on July 1, 2023. However, two of the most notable ones are discussed below:

Notice Concerning Sexual Misconduct

Section 10-21.9 of the Illinois School Code (105 ILCS 5/10-21.9) addresses the fingerprint-based criminal history records checks required of all school employment applicants. Currently, Section 10-21.9(e-5) requires each school superintendent to notify the State Superintendent of Education and the applicable regional superintendent of schools of any license holder who is dismissed or resigns if the school superintendent reasonably believes that the license holder has committed an intentional act of abuse or neglect against a child.

Under the new law, this notice must also be given whenever the school superintendent has reasonable cause to believe that the former employee engaged in "sexual misconduct" as defined in Section 22-85.5 of the School Code. 105 ILCS 5/22-85.5. Such "sexual misconduct" includes, but is not limited to, any verbal, nonverbal, written, or electronic communication or physical activity, directed toward or with a student to establish a romantic or sexual relationship with the student (*e.g.*, a sexual or romantic invitation, dating or soliciting a date, engaging in sexualized or romantic dialog, a sexual, indecent, romantic or erotic contact with the student, etc.).

Employment History Review

The new amendments also installs Section 22-94 of the School Code, which requires a heightened review of the employment history of temporary or permanent employees or contracted employees. 105 ILCS 5/22-94.

Initially, the Illinois State Board of Education must develop an employment history template for use by schools and school contractors. Using this template, each school or school contractor will verify that applicants are not disqualified from working directly with students or children by eliciting information from the applicant and then confirming that information with ISBE as well as with the applicant's past employers.

Each school / school contractor applicant must provide (1) contact information for their current and past employers where they have had direct contact with children; (2) a written authorization allowing the current and former employers to release certain employment records; and (3) a release of such employers from any liability that may arise from such disclosure.

The applicant is expected to complete a written statement answering whether they have ever (1) been the subject of a sexual misconduct allegation; (2) been dismissed, resigned, asked to resign, non-renewed, or been disciplined by an employer due to sexual misconduct; or (3) had a license or certificate suspended, surrendered or revoked, or had an application for licensure, approval or endorsement denied because of sexual misconduct. The applicant does not have to provide any of this information about an allegation about which there has been a finding that the allegation was false, unfounded, or unsubstantiated. However, an applicant who provides false information or willfully fails to disclose required information shall be subject to discipline and/or denial of employment.

A school may not hire an applicant for a position involving direct contact with children/students if the applicant does not provide the information required. A school must also verify, for those applicants who are licensed by ISBE, the applicant's reported previous employers in ISBE's educator licensure database to ensure accuracy.

Additionally, the school / contractor shall use the ISBE template to request from each employer listed by the applicant (1) the dates of their employment, and (2) a statement mirroring the information required to be disclosed by the applicant. Again, this information is not required if there has been a finding that the allegation was false, unfounded, or unsubstantiated. The template will give former employers the option to state that it has no knowledge of information that would disqualify the applicant.

If the former employer does have information responsive to the request, it shall disclose that information within twenty days after receiving the request from the prospective school / school contractor employer. The information should come from the human resources or central office of the former employer. In addition to completing the template, the former employer must provide additional information about the matters disclosed and all related records. The law expressly exempts such information from Freedom of Information Act requests.

Upon receipt of information from a former employer, a school or contractor may use the information to evaluate an applicant's fitness to be hired or for continued employment. They may also report the information, if appropriate, to ISBE, the State licensing agency, law enforcement agency, DCFS, another school or contractor, or a prospective employer.

Notably, any employer, school, school administrator or contractor who provides information or records about current or former employees or applicants under this new law is immune from criminal and civil liability, unless the information or records provided were knowingly false.

Conclusion

When it goes into effect on July 1, 2023, the requirements of P.A. 102-0702 will apply to new employment applicants but not to then-current employees. Once ISBE finalizes its template, schools will need to train their Human Resources staff to use the template and elicit the necessary information. Staff will also need to complete the template for current employees upon their separation from employment and update the information as necessary prior to releasing it upon request from another school district. If you have questions on how to prepare for these future operational obligations, please contact an Ottosen DiNolfo Hasenbalg & Castaldo, Ltd. attorney.

Circuit Court Finds Prejudgment Interest Statute Unconstitutional

by Bradley Michalowski

On May 27, 2022, Cook County Judge Marcia Maras concluded that a statute providing for prejudgment interest for plaintiffs asserting personal injury and wrongful death torts is invalid and unconstitutional.

In *Hyland et al., v. Advocate Health and Hospital Corp. et al.*, the representatives of prematurely born twins (one of whom did not survive) sued alleging negligence by the Defendant doctors. As the suit was pending, the Illinois General Assembly passed Senate Bill 0072, which Governor Pritzker signed and later became law on July 1, 2021. As we previously reported, the Bill provided interest at a rate of 6% on all damages incurred pre-judgment for plaintiffs who bring personal injury and wrongful death claims. 735 ILCS 5/2-1303.

Believing that Senate Bill 0072 violates the Illinois Constitution, a defendant filed a motion asking the court to deem it invalid. The plaintiff countered that the alleged constitutional issues failed to satisfy the ripeness doctrine because a judgment had not yet been entered.

After concluding that the constitutional issues were ripe for review, the court struck down Senate Bill 0072 as unconstitutional on two grounds.

First, the court found that the Bill violated Illinois Constitution Article I, Section 13, which safeguards the right to trial by jury. In the court's view, an additional award of prejudgment interest for personal injury and wrongful death torts infringes upon that right because the Bill's fixed interest rate disallows the jury to evaluate all aspects of the case. Additionally, Judge Maras was persuaded that Illinois juries already factor in prejudgment interest when calculating damages. For those reasons, Judge Maras held Senate Bill 0072 invalid because it usurped the jury's role to determine damages.

Second, Judge Maras also held that Senate Bill 0072 violates the prohibition against special legislation in the Illinois Constitution. Judge Maras used two tests in coming to this conclusion: the strict scrutiny test and the rational basis test.

According to the court, Senate Bill 0072 did not survive strict scrutiny. This was primarily because the Illinois state legislature stripped the jury of the ability to assess

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The Potential Impact of SECURE Act 2.0 on Small Business

by Michael Castaldo III

The U.S. House of Representatives passed the "Securing a Strong Retirement Act of 2021" (hereinafter "SECURE 2.0" or the "Bill") on March 29, 2022 after an overwhelmingly bipartisan vote of 414-5. SECURE 2.0 is an effort by Congress to offset the retirement savings crisis in the United States and attempts to build on the initiatives already started to help a wide range of Americans achieve retirement security and financial wellbeing. In sum, the Bill is aimed at: (i) getting people to save more for retirement; (ii) improving retirement rules; and (iii) lowering the employer cost of setting up a retirement plan. The Bill is now pending before the Senate and is undergoing modifications. But given its obvious bipartisan support, it is anticipated the Bill will eventually pass both chambers. This Article overviews the impact SECURE 2.0 might have on small employers.

Auto Enrollment

If enacted, SECURE 2.0 would require employers that start retirement plans like 401(k)'s or 403(b)'s to automatically enroll employees when they are hired at a pre-tax contribution rate of at least 3%, although the employee will have the option to elect out or elect a different percentage. Under the current language of the Act, this 3% initial rate would then automatically increase by 1% every year up to 10% until the employee contributes a certain percentage, but in no case can it exceed 15%. This means that, while an employer is required to enroll employees, an employee can elect not to contribute at all. This automatic process is intended to help remove the initial hurdle to start saving. In theory, it would give employees a better foundation to build and develop their overall savings and retirement strategy. The good news for small (and new) businesses; however, is that the current Bill exempts businesses with ten or less employees, as well as business that have not been operating for at least three years, from these proposed automatic enrollment requirements.

Credits For Student Loan Payments

The student debt crisis generates plenty of discussion of its own. In this context, Congress identified that graduates can be deterred from saving for retirement due to the need to pay student loans. The Bill would allow employers to offer matching contributions to employees who are paying off student loans. In theory, this would reduce the need to choose between saving for retirement and paying off student loans. This could be key in helping many individuals jump start their retirement plan before it is too late to take full advantage of their youth.

Catch-Up Contributions

On the opposite side of the retirement spectrum, those that are already well into their career can also find some relief in the proposed Bill. If adopted as-is, SECURE 2.0 could help those who may have under-saved throughout their career by increasing 401(k) catch-up contributions to $10,000 for those aged 62-64. Intended to act as a last chance to save money while in the workforce, catch-up contributions are already designed specifically for people who are closer to retirement so they can save more at a time when they may have the means to do so. The current allowed maximum for catch-up contributions sits at $6,500 for those who are 50 or older, so this increase could make a significant difference for some individuals. The current version of the Bill includes a provision that would require all catch-up contributions be made to Roth arrangements with no tax deduction, but these savings eventually lead to potentially higher tax-free withdrawals and increased net income during retirement.

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Ottosen DiNolfo to Host Reception at the 78th Annual IAFPD Conference
I-Hotel & Conference Center
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Please join us for
hors d'oeuvres and cocktails on
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5:00 - 7:00 p.m.
I-Hotel & Conference Center
Heritage Hall Lobby

Lower Court Rules Pension Fund Consolidation Law Constitutional

by John E. Motylinski

In 2019, the Illinois General Assembly passed Public Act 101-0610, which required downstate police and firefighter local pension funds' assets to be consolidated into statewide funds for investment purposes.

In early 2021, a group of active and retired members of eighteen police and firefighters' pension funds filed a lawsuit complaint against Governor Pritzker, the two new consolidated pension investment funds, and others in the Kane County Circuit Court. The goal of the action was to declare the consolidation law invalid under the Illinois Constitution's Pension Protection Clause, Contracts Clause, and Takings Clause. Indeed, the plaintiffs claimed that they "had a contractual and enforceable right to exclusively manage and control their investment expenditures and income, including interest dividends, capital gains, and other distributions on investments," which the consolidation infringed upon. The defendants, on the other hand, asserted there was no constitutionally protected benefit in local control of investment assets.

On May 25, 2022, the circuit court upheld the consolidation law as constitutional.

First, the court found that the consolidation law significantly impacted pensioners and members of downstate police and firefighters' pension funds. This is because the court (incorrectly) believed that "prior to the Act, there were approximately 650 local police and firefighter pension funds in Illinois and that each fund was governed by a five-member board of directors" and "the Act eliminated all of the Local Fund's boards in favor of two statewide boards governing the New Funds." In the court's view, dissolution of the local boards diluted the voting strength of their membership because, post-consolidation, the voting pool became much larger.

Yet, the court appears to have mistaken the facts. Public Act 101-0610 did not dissolve local pension funds and wrap them up into two statewide funds. Instead, the law merely requires the local funds to invest their monies in the Illinois Police Officers' Pension Investment Fund and the Illinois Firefighters' Pension. Given the remainder of the opinion, however, it is unclear whether this factual discrepancy would have altered the court's conclusion.

The court then determined that voting rights are not a "benefit" within the meaning of the Illinois Constitution's Pension Protection Clause. Article XIII, Section 5, of the Illinois Constitution provides that "[m]embership in any pension or retirement system of the State, any unit of local government or school district, or any agency or instrumentality thereof, shall be an enforceable contractual relationship, the benefits of which shall not be diminished or impaired." ILL. CONST. 1970, art. XIII, § 5. The Illinois Supreme Court has interpreted this to mean that public employees have an inviolable contractual right to their vested pension benefits, which cannot be diminished or impaired. Therefore, the high court has routinely struck down legislation that diminishes such benefits.

The circuit court, however, determined that voting rights are not protected "benefits." The court arrived at that conclusion after surveying the Illinois Supreme Court's Pension Protection Clause cases and finding that the term "benefits" has never been extended to encompass voting rights. In the absence of a firm declaration by the Illinois Supreme Court that "benefits" did capture non-monetary aspects, the circuit court declined to find the consolidation law unconstitutional.

Next, the court held that the consolidation law did not violate the Illinois Constitution's Takings Clause. This provides that "private property shall not be taken or damaged for public use without just compensation as provided by law." ILL. CONST. 1970, art. I, § 15. The plaintiffs contended that the consolidation law diminished their property (*i.e.*, their pension benefits) because the local funds had to subsidize the two statewide funds' startup costs. Yet, the court decided that the asserted benefits did not constitute "private property" within the meaning of the Takings Clause, which applies only to real property. Also, any potential for losses was speculative.

For those reasons, the circuit court upheld the constitutionality of the consolidation law.

Undoubtedly, the circuit court will not have the last word on this issue. On June 1, 2022, the plaintiffs filed a notice of appeal, which will put the issue to the Illinois Appellate Court, Second District. And even after the Appellate Court renders its decision, the Illinois Supreme Court may decide to hear the case, too. Therefore, pensioners and board members alike should continue to monitor this litigation.

SECURE Act 2.0

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Annuities

SECURE 2.0 also modifies the rules concerning Qualified Longevity Annuity Contracts ("QLACs"). A QLAC is a type of deferred annuity funded with an investment from a qualified retirement plan or an individual retirement account ("IRA"). In essence, it provides guaranteed monthly payments until death and is shielded from downturns in the stock market. As long as the annuity complies with Internal Revenue Service requirements, it is exempt from the required minimum distribution ("RMD") rules until payouts begin after the specified annuity starting date. The current maximum that can go into a QLAC is the lesser of $135,000 or 25% of the value of an individual's retirement accounts. The proposed legislation currently removes the 25% cap.

Required Minimum Distributions

The Bill's predecessor changed the age at which required minimum distributions from retirement accounts must begin from 70.5 to 72. Required minimum distributions would not have to start until age 73 beginning in 2022, age 74 in 2029, and 75 in 2032. The changes would become effective after December 31, 2021, for anyone who reaches age 72 after that date. Additionally, those who presently fail to take their full RMD face a 50% excise tax. SECURE 2.0 would reduce the excise tax to 25%, and even further down to 10% if the mistake is corrected quickly.

Conclusion

Through SECURE 2.0, Congress intends to address the retirement crisis in America. At present, the Bill has not yet passed the Senate, but it has good prospects. In fact, the Bill has broad bipartisan support and a number of legislators have made passage a priority. If this Bill were to become law, it would benefit small employers in a variety of ways. Regardless of the size of your business, if you have any questions on how SECURE 2.0 might impact your operations and finances, please do not hesitate to reach out to one of the attorneys at Ottosen DiNolfo Hasenbalg & Castaldo, Ltd.

Prejudgment Interest

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damages through the passage of this Bill which innately factors in prejudgment interest. In the court's words, this "cannot be construed to advance any compelling State interest."

Nor could the Bill pass the much more lenient rational basis test. The court concluded that Senate Bill 0072 discriminates against defendants in personal injury and wrongful death suits, as those are the only torts which allow prejudgment interest benefit for a prevailing plaintiff. This created an arbitrary classification, which was constitutionally impermissible. As the court put it, the Bill wrongly "divides tort parties into two groups: parties to a personal injury and wrongful death actions who are subject to prejudgment interest, and all other tort parties who are not." This "clearly and arbitrarily favors personal injury and wrongful death plaintiffs and is not rationally related to any State interest." Moreover, the Bill "may allow a not so diligent plaintiff to reap the advantage of prejudgment interest even where that plaintiff has dragged their feet in the litigation." The fact that the Bill lacks a vehicle to measure which party may be at fault for delay cut against it having a rational basis. Thus, the court held the Bill unconstitutional.

The circuit court's ruling in *Hyland* signals that Senate Bill 0072's oppressive prejudgment interest scheme may not survive after all. However, the issue will likely be taken up with the Illinois Supreme Court. Therefore, litigants statewide should continue to monitor the constitutionality of Senate Bill 0072.

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