IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

1 1220
11/6/2024 11:00 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2024CH09985
Calendar, 14
30087361

FII FD

NIKLAS HUNDER,)
Plaintiff,)
v.)
CHICAGO TRANSIT AUTHORITY,) 2024CH09985
Defendant.)

COMPLAINT

1. NOW COMES Plaintiff NIKLAS HUNDER who brings this suit to overturn CHICAGO TRANSIT AUTHORITY's willful violation of the Illinois Freedom of Information Act in its refusal to conduct reasonable searches, issue determinations, and produce records under its allowed timeframe. In support of the Complaint, NIKLAS HUNDER states as follows:

INTRODUCTION

- 2. Pursuant to the fundamental philosophy of the American constitutional form of government, it is the public policy of the State of Illinois 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 as public officials and public employees consistent with the terms of the Illinois Freedom of Information Act ("FOIA"). 5 ILCS 140/1.
- 3. Restraints on access to information, to the extent permitted by FOIA, are limited exceptions to the principle that the people of this state have a right to full disclosure of information relating to the decisions, policies, procedures, rules, standards, and other aspects of government activity that affect the conduct of government and the lives of the people. 5 ILCS 140/1.

- 4. Under 5 ILCS 140/1.2, "[a]ll records in the custody or possession of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt." 5 ILCS 140/1.2.
- 5. Under 5 ILCS 140/2(g), "Recurrent requester", as used in Section 3.2 of this Act, means a person that, in the 12 months immediately preceding the request, has submitted to the same public body (i) a minimum of 50 requests for records, (ii) a minimum of 15 requests for records within a 30-day period, or (iii) a minimum of 7 requests for records within a 7-day period."
- 6. Under 5 ILCS 140/3.2(a), "Notwithstanding any provision of this Act to the contrary, a public body shall respond to a request from a recurrent requester, as defined in subsection (g) of Section 2, within 21 business days after receipt. The response shall (i) provide to the requester an estimate of the time required by the public body to provide the records requested and an estimate of the fees to be charged, which the public body may require the person to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions set out in this Act, (iii) notify the requester that the request is unduly burdensome and extend an opportunity to the requester to attempt to reduce the request to manageable proportions, or (iv) provide the records requested."
- 7. Under 5 ILCS 140/3.2(b), "Within 5 business days after receiving a request from a recurrent requester, as defined in subsection (g) of Section 2, the public body shall notify the requester (i) that the public body is treating the request as a request under subsection (g) of Section 2, (ii) of the reasons why the public body is treating the request as a request under subsection (g) of Section 2, and (iii) that the public body will send an initial response within 21 business days after receipt in accordance with subsection (a) of this Section."

- 8. Under 5 ILCS 140/3(g) "Requests calling for all records falling within a category shall be complied with unless compliance with the request would be unduly burdensome for the complying public body and there is no way to narrow the request and the burden on the public body outweighs the public interest in the information. Before invoking this exemption, the public body shall extend to the person making the request an opportunity to confer with it in an attempt to reduce the request to manageable proportions."
- 9. Public Access Opinion 21-001 (Request for Review 2022 PAC 65160) (January 26, 2021) concluded that a public body has a duty to confer before denying a request as unduly burdensome.

PARTIES

- 10. Plaintiff NIKLAS HUNDER made the FOIA requests at issue in this case.
- 11. Defendant CHICAGO TRANSIT AUTHORITY ("CTA") is a public body located in Cook County, Illinois.

APRIL 12th, 2024, FOIA REQUEST

- 12. NIKLAS HUNDER is a recurrent requester as of January 11th, 2024, as defined in 5 ILCS 140/2(g)(iii).
- 13. On April 12th, 2024, NIKLAS HUNDER submitted a FOIA request to CTA for the following:
 - "By day from 1/1/24 untill [sic] seven calendar days before this request is filled, please provide the number of staff assigned to each rail terminal and bus garage (with each being broken down by assigned route) and how many employees called off at each location. Please provide the record showing how many excess staff were assigned by rail terminal and bus garage that were to cover for employees who had called off. Also provide documentation if it exists on how soon call offers were made and records that show violations of call out policy (along with a copy of that policy)."
- 14. On April 18th, 2024, CTA acknowledged receipt of the request, assigned reference number FOIA 2024-0451 to the request, and notified NIKLAS HUNDER that under 5 ILCS 140/3(e) that it was treating his request pursuant to 5 ILCS 140/3.2 and 5 ILCS 140/2(g). CTA also informed

NIKLAS HUNDER that "In accordance with that statute, CTA must respond to each of these requests within 21 business days after receipt. 5 ILCS 140/3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

- 15. A true and correct copy of the acknowledgment/extension letter quoting the request is attached as Exhibit 1.
- 16. As of the date of this filing, CTA has failed to comply with FOIA and has not responded to NIKLAS HUNDER under 5 ILCS 140/3.2(a).
- 17. From April 12th, 2024, continuing to present, CTA has been aware of FOIA's statutory deadlines pertaining to the request.
- 18. All public bodies are required to take annual Public Access Counselor training.
- 19. The PAC training for the year of and year preceding the request in this case indicate the deadlines to respond to recurrent requests.
- 20. Upon information and belief, defendant's FOIA officer took the required PAC training prior to the deadline to respond to the request.

JUNE 20th, 2024, FOIA REQUEST

- 21. NIKLAS HUNDER is a recurrent requester as of January 11th, 2024, as defined in 5 ILCS 140/2(g)(iii).
- 22. On June 20th, 2024, NIKLAS HUNDER submitted a FOIA request to CTA for the following:
 - "- Exit Surveys and employee satisfaction surveys administered by any CTA personnel after the employee was fired, terminated, resigned, discharged, etc. from 1/1/22 to 5 business days before this request is filled. In the event of documents that would typically be exempt under 5 ILCS 140/7(f), the head of the public body Dorval R. Carter referenced these documents in the Q2/May 2024 subject matter hearing held by the Committee on Transportation and Public Way on May 30th, 2024.
 - Documents issued by the CTA Control Center called "CTA Control Center Alert" from 1/1/24 to 5 days before this request is filled. An example of matching records would be similar to those provided in response to CTA FOIA 0163. In the event of records that appear to be duplicated, please exclude the email version only if the original format is located. If multiple records are found for the same incident ID, only provide the final communication of each incident ID."
- 23. On June 27th, 2024, CTA acknowledged receipt of the request, assigned reference number FOIA 2024-0662 to the request, and informed NIKLAS HUNDER that under 5 ILCS 140/3.2 and 2(g) it was treating his request as a recurrent request. CTA also informed NIKLAS HUNDER that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period

considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2."

- 24. A true and correct copy of the acknowledgment/extension letter quoting the request is attached as Exhibit 2.
- 25. On July 22nd, 21 business days after NIKLAS HUNDER submitted his request, CTA responded to NIKLAS HUNDER notifying him that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time, first, by notifying you that the second aspect of your request is unduly burdensome to process as it encompasses thousands of alerts that will need to be reviewed one by one for exempt information. CTA will also need to review every alert during this time period to identify only the final communication of each incident ID. 5 ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to attempt to reduce this aspect of your request to manageable proportions. Secondly, CTA is also providing you with an estimate of the time required by CTA to complete the processing of the remainder of your request. CTA anticipates at this time that it will need until <u>August 19, 2024</u> to complete the remainder of your request."
- 26. A true and correct copy of the second extension/partial denial letter quoting the request is attached as Exhibit 3.
- 27. CTA provided a 61-page responsive record to the first item of NIKLAS HUNDER's request on October 4th, 2024 with proper redactions and ministerial markings pursuant to 5 ILCS 140/7.
- 28. True and correct copies of the partial response letter and the responsive record are attached as Exhibits 4 and 5, respectfully.

- 29. In response to Exhibit 4, on July 22nd, 2024, NIKLAS HUNDER and CTA began to confer to bring the second item of his request to manageable proportions pursuant to 5 ILCS 140/3(g) and 3.2(a)(iii).
- 30. A true and correct copy of the conferral communications between NIKLAS HUNDER and CTA that were exchanged through electronic mail is attached as Exhibit 6.
- 31. Upon information and belief, CTA stopped negotiating in good faith on August 20th, 2024 when it stopped responding to NIKLAS HUNDER.
- 32. NIKLAS HUNDER followed up on September 9th, 2024 to his August 20th, 2024 response that further offered to reduce the scope of his request seeking to clarify if CTA had determined the reduced scope as reasonable to process. CTA did not respond to NIKLAS HUNDER's September 9th follow-up e-mail.
- 33. As of the date of this filing, CTA has failed to comply with 5 ILCS 140/3(g) when it did not complete or make a good faith attempt to help NIKLAS HUNDER reduce the scope of his request to a manageable proportion and has improperly denied the second aspect of the request.
- 34. In its partial response to NIKLAS HUNDER on October 4th, 2024, 33 business days after its estimated response date, and 74 business days after the request was filed, CTA has violated 5 ILCS 140/3.2(c) by not providing a response "within a reasonable period considering the size and complexity of the request."
- 35. From June 27th, 2024, continuing to present, CTA has been aware of FOIA's statutory deadlines and conferral processes pertaining to the request.
- 36. All public bodies are required to take annual Public Access Counselor training.
- 37. The PAC training for the year of and year preceding the request in this case indicates the deadlines to respond to recurrent requests and obligation to confer.

38. Upon information and belief, defendant's FOIA officer took the required PAC training prior to the deadline to respond to the request.

JUNE 27th, 2024, FOIA REQUEST

- 39. NIKLAS HUNDER is a recurrent requester as of January 11th, 2024, as defined in 5 ILCS 140/2(g)(iii).
- 40. On June 27th, 2024, NIKLAS HUNDER submitted a FOIA request to CTA for the following:

"For records created for FY 2018 through FY2023:

- CTA Safety Plan as required by 49 CFR Part 673
- Audit reports created by CTA employees or externally contracted firms that may have
 assisted in meeting federal compliance standards in the below categories. Records being
 searched for do not need to explicitly cite the federal regulation they are meeting by the
 production of that audit. The information provided in parentheses is not a requirement for
 a match or a limiting factor in the search. It is provided for clarification and assistance
 when determining where such records would be located. Both failed and
 passed audits should be included.
 - Financial (such as A-133 as required under 2 CFR Part 200, and annual financial audits like the one referenced in the June 26th, 2024 Transit Board meeting)
 - oRail Safety (such as State Safety Oversight for compliance with 49 CFR Part 674)
 - Labor/OSHA (for checking compliance with federal regulations 29 CFR Part 1910,
 29 U.S.C. § 201, 29 U.S.C. § 651, 29 U.S.C. § 2601, 29 U.S.C. § 151, 42 U.S.C. §
 12101 or state regulations 820 ILCS 105, 820 ILCS 219, 820 ILCS 305, 775 ILCS 5)
 - Vehicle and Facility Maintenance Audits (such as those created for grant compliance and as required by FTA maintenance guidelines)
 - oEnvironmental (such as those required by the National Environmental Protection Act [NEPA] for major construction processes and federal regulations 42 U.S.C. § 7401, 33 U.S.C. § 1251, 42 U.S.C. § 6901, 42 U.S.C. § 9601, and 42 U.S.C. § 4321. State compliance would be 415 ILCS 5, 415 ILCS 5/9, 430 ILCS 30, and 415 ILCS 55).
 - Energy (fuel mix, vehicle efficiency)
 - Exclude building efficiency audits (except for maintenance facilities as required by the FTA)
 - o Grant Management Audits (also required by 2 CFR Part 200)
- Annual financial statements

- Records outlining actionable steps created as a result of any of the audits discovered from the listed above. Records that demonstrate actional steps but were not derived from the audits listed above do not need to be provided.
- Internal policies for handling complaints and safety issues from workers."
- 41. On July 5th, 2024, CTA acknowledged receipt of the request, assigned reference number FOIA 2024-0687 to the request, and informed NIKLAS HUNDER that under 5 ILCS 140/3.2 and 2(g) it was treating his request as a recurrent request and was extending CTA's time to respond to his request by 21 business days. CTA also informed NIKLAS HUNDER that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2."
- 42. A true and correct copy of the acknowledgment/extension letter quoting the request is attached as Exhibit 7.
- 43. As of the date of this filing, CTA has failed to comply with 5 ILCS 140/3.2(a) by either (i) providing NIKLAS HUNDER an estimate of the time required for CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require NIKLAS HUNDER to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions in 5 ILCS 140/7, (iii) notify NIKLAS HUNDER that the request is unduly

burdensome and extend an opportunity to reduce the request to manageable proportions, or (iv) provide the records requested.

- 44. From July 5th, 2024, continuing to present, CTA has been aware of FOIA's statutory deadlines pertaining to the request.
- 45. All public bodies are required to take annual Public Access Counselor training.
- 46. The PAC training for the year of and year preceding the request in this case indicate the deadlines to respond to recurrent requests.
- 47. Upon information and belief, defendant's FOIA officer took the required PAC training prior to the deadline to respond to the request.

JULY 26th, 2024, FOIA REQUEST

- 48. NIKLAS HUNDER is a recurrent requester as of January 11th, 2024, as defined in 5 ILCS 140/2(g)(iii).
- 49. On July 26th, 2024, NIKLAS HUNDER submitted a FOIA request to CTA for the following:

"I would like to make a non-commercial FOIA request. Please search for the following records broken down into headcount by position, terminations initiated by CTA by position, transfers to other departments (specify what department they were transferred to) by position, and resignations by position for each month in the below date ranges.

The specific positions and date ranges are as follows:

- Rapid Transit Operator Headcount from 1/1/19 to 7/31/24
- Combined Service Operator from 1/1/19 to 7/31/24
- Flagger from 1/1/19 to 10/31/21 and 1/1/24 to 7/31/24
- Switch Worker from 1/1/19 to 7/31/24
- Tower Workers from 1/1/19 to 7/31/24
- Extra Board from from 1/1/19 to 7/31/24
- Yardmaster from 1/1/19 to 7/31/24
- Bus Operator from 1/1/19 to 7/31/24

Additionally, search for a copy of the 2024 Q2 Customer Satisfaction Survey and any presentations developed from its results."

- 50. On August 2nd, 2024, CTA acknowledged receipt of the request, assigned reference number FOIA 2024-0784 to the request, and informed NIKLAS HUNDER that under 5 ILCS 140/3.2 and 2(g) it was treating his request as a recurrent request. CTA also informed NIKLAS HUNDER that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2."
- 51. A true and correct copy of the acknowledgment/extension letter quoting the request is attached as Exhibit 8.
- 52. On August 26th, 2024, 21 business days after NIKLAS HUNDER submitted his request, CTA responded to NIKLAS HUNDER notifying him that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time by notifying you that your request as currently stated is unduly burdensome to process. 5 ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to confer in an attempt to reduce your request to more manageable proportions."

- 53. A true and correct copy of the unduly burdensome letter quoting the response is attached as Exhibit 9.
- 54. In response to Exhibit 9, on August 29th, 2024, NIKLAS HUNDER and CTA began to confer to bring the second item of his request to manageable proportions pursuant to 5 ILCS 140/3(g) and 3.2(a)(iii).
- 55. A true and correct copy of the conferral communications between NIKLAS HUNDER and CTA that were exchanged through e-mail is attached as Exhibit 10.
- 56. In its August 30th, 2024 response to NIKLAS HUNDER, CTA indicated it would make a determination if NIKLAS HUNDER's revised request was not burdensome to process when it responded with "I will update you as soon as possible next week on this one."
- 57. Upon information and belief, CTA stopped negotiating in good faith on August 30th, 2024 when it stopped responding to NIKLAS HUNDER.
- 58. NIKLAS HUNDER followed up on September 12th, 2024 to CTA's August 30th, 2024 response that indicated it would provide a response the following week.
- 59. CTA did not respond to NIKLAS HUNDER's September 12th check-in e-mail.
- 60. As of the date of this filing, CTA has failed to comply with 5 ILCS 140/3(g) when it did not complete or make a good faith attempt to help NIKLAS HUNDER reduce the scope of his request to a manageable proportion and has improperly denied the second aspect of the request.
- 61. From August 2nd, 2024, continuing to present, CTA has been aware of FOIA's statutory deadlines pertaining to the request.
- 62. All public bodies are required to take annual Public Access Counselor training.
- 63. The PAC training for the year of and year preceding the request in this case indicates the obligation to confer.

64. Upon information and belief, defendant's FOIA officer took the required PAC training prior to the deadline to respond to the request.

JULY 30th, 2024, FOIA REQUEST

- 65. NIKLAS HUNDER is a recurrent requester as of January 11th, 2024, as defined in 5 ILCS 140/2(g)(iii).
- 66. On July 30th, 2024, NIKLAS HUNDER submitted a FOIA request to CTA for the following:
- "I would like to make a non-commercial FOIA request for the following records between 10/1/14 and 7/1/24
- Records showing local, state, and federal grants CTA submitted applications for that indicate the agency/funder, grant title, program title (if applicable), Catalog of Federal Domestic Assistance (CFDA) number or Funding Opportunity Number (FON), status (such as submitted, under review, awarded, complete, reporting period, and others as used by CTA), and award amount.
- For each funded or denied grant application, provide the denial or award/funding notice letter issued by the awarding agency/funder."
- On August 7th, 2024, CTA acknowledged receipt of the request, assigned reference number FOIA 2024-0795 to the request, and informed NIKLAS HUNDER that under 5 ILCS 140/3.2 and 2(g) it was treating his request as a recurrent request. CTA also informed NIKLAS HUNDER that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records

are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2."

- 68. A true and correct copy of the acknowledgment/extension letter quoting the request is attached as Exhibit 11.
- 69. On August 29th, 2024, 21 business days after NIKLAS HUNDER submitted his request, CTA responded to NIKLAS HUNDER notifying him that "In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time by notifying you that your request as currently stated is unduly burdensome to process. 5 ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to confer in an attempt to reduce your request to more manageable proportions."
- 70. A true and correct copy of the unduly burdensome letter quoting the response is attached as Exhibit 12.
- 71. In response to Exhibit 12, on August 29th, 2024, NIKLAS HUNDER and CTA began to confer to bring the second item of his request to manageable proportions pursuant to 5 ILCS 140/3(g) and 3.2(a)(iii).
- 72. A true and correct copy of the conferral communications between NIKLAS HUNDER and CTA that were exchanged through electronic mail is attached as Exhibit 13.
- 73. In its August 30th, 2024 response to NIKLAS HUNDER, CTA indicated it would make a determination if NIKLAS HUNDER's revised request was no longer burdensome to process when it responded with "I am working here to determine if that change alone will make your request manageable to process. I will let you know as soon as possible."
- 74. Upon information and belief, CTA stopped negotiating in good faith on August 30th, 2024 when it stopped responding to NIKLAS HUNDER.

- 75. NIKLAS HUNDER followed up on September 12th, 2024 to CTA's August 30th, 2024 response that indicated it would look into NIKLAS HUNDER's revised request.
- 76. CTA did not respond to NIKLAS HUNDER's September 12th check-in e-mail.
- 77. As of the date of this filing, CTA has failed to comply with 5 ILCS 140/3(g) when it did not complete or make a good faith attempt to help NIKLAS HUNDER reduce the scope of his request to a manageable proportion and has improperly denied the second aspect of the request.
- 78. From August 2nd, 2024, continuing to present, CTA has been aware of FOIA's statutory deadlines pertaining to the request.
- 79. All public bodies are required to take annual Public Access Counselor training.
- 80. The PAC training for the year of and year preceding the request in this case indicates the deadlines to respond to recurrent requests and obligation to confer.
- 81. Upon information and belief, defendant's FOIA officer took the required PAC training prior to the deadline to respond to the request.

COUNT I – APRIL 12th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3.2(a)

- 82. Paragraphs 12-20, above, are incorporated by reference.
- 83. CTA is a public body under FOIA.
- 84. The records sought in the FOIA request include non-exempt public records or non-exempt sections of public records of CTA.
- 85. CTA failed to follow the proper procedures for responding to this request.
- 86. CTA violated FOIA by failing to respond and provide an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, deny the request pursuant to one or more of the exemptions available under FOIA, notify that the request is unduly burdensome and extend an opportunity to reduce the request, or provide the records requested.

87. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

WHEREFORE, NIKLAS HUNDER asks that the Court:

- i. declare that CTA has violated FOIA;
- ii. order CTA to conduct an adequate search for the requested records;
- iii. order CTA to produce all non-exempt portions of the requested records;
- iv. enjoin CTA from withholding non-exempt public records under FOIA;
- v. order CTA to pay civil penalties;
- vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and monitor its compliance; and
- vii. award such other relief the Court considers appropriate.

COUNT II – JUNE 20th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3(g)

- 88. Paragraphs 21-38, above, are incorporated by reference.
- 89. CTA is a public body under FOIA.
- 90. The records sought in the FOIA request include non-exempt public records or non-exempt sections of public records of CTA.
- 91. CTA failed to finish the conferral process for this request.
- 92. CTA violated FOIA by failing to properly confer in an attempt to reduce this request to manageable proportions.
- 93. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

- i. declare that CTA has violated FOIA;
- ii. order CTA to conduct an adequate search for the requested records;

- iii. order CTA to produce all non-exempt portions of the requested records;
- iv. enjoin CTA from withholding non-exempt public records under FOIA;
- v. order CTA to pay civil penalties;
- vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and monitor its compliance; and
- vii. award such other relief the Court considers appropriate.

COUNT III – JUNE 20th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3.2(c)

- 94. Paragraphs 21-38, above, are incorporated by reference.
- 95. CTA is a public body under FOIA.
- 96. The records sought in the FOIA request include non-exempt public records or non-exempt sections of public records of CTA.
- 97. CTA failed to follow the proper procedures for responding to this request.
- 98. CTA violated FOIA by failing to produce records responsive to this request in a reasonable amount of time given its size and complexity.
- 99. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

- i. declare that CTA has violated FOIA;
- ii. order CTA to conduct an adequate search for the requested records;
- iii. order CTA to produce all non-exempt portions of the requested records;
- iv. enjoin CTA from withholding non-exempt public records under FOIA;
- v. order CTA to pay civil penalties;

- vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and monitor its compliance; and
- vii. award such other relief the Court considers appropriate.

COUNT IV – JUNE 27th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3.2(a)

- 100. Paragraphs 39-47, above, are incorporated by reference.
- 101. CTA is a public body under FOIA.
- 102. The records sought in the FOIA request include non-exempt public records or non-exempt sections of public records of CTA.
- 103. CTA failed to follow the proper procedures for responding to this request.
- 104. CTA violated FOIA by failing to respond and provide an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, deny the request pursuant to one or more of the exemptions available under FOIA, notify that the request is unduly burdensome and extend an opportunity to reduce the request, or provide the records requested.
- 105. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

- i. declare that CTA has violated FOIA;
- ii. order CTA to conduct an adequate search for the requested records;
- iii. order CTA to produce all non-exempt portions of the requested records;
- iv. enjoin CTA from withholding non-exempt public records under FOIA;
- v. order CTA to pay civil penalties;
- vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and monitor its compliance; and

vii. award such other relief the Court considers appropriate.

COUNT V – JULY 26th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3(g)

- 106. Paragraphs 48-64, above, are incorporated by reference.
- 107. CTA is a public body under FOIA.
- 108. The records sought in the FOIA request include non-exempt public records or non-exempt sections of public records of CTA.
- 109. CTA failed to finish the conferral process for this request.
- 110. CTA violated FOIA by failing to properly confer in an attempt to reduce this request to manageable proportions.
- 111. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

- i. declare that CTA has violated FOIA;
- ii. order CTA to conduct an adequate search for the requested records;
- iii. order CTA to produce all non-exempt portions of the requested records;
- iv. enjoin CTA from withholding non-exempt public records under FOIA;
- v. order CTA to pay civil penalties;
- vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and monitor its compliance; and
- vii. award such other relief the Court considers appropriate.

COUNT VI – JULY 30th, 2024 FOIA REQUEST CTA VIOLATION OF 5 ILCS 140/3(g)

112. Paragraphs 65-81, above, are incorporated by reference.

113. CTA is a public body under FOIA.

114. The records sought in the FOIA request include non-exempt public records or non-exempt

sections of public records of CTA.

115. CTA failed to finish the conferral process for this request.

116. CTA violated FOIA by failing to properly confer in an attempt to reduce this request to

manageable proportions.

117. CTA willfully and intentionally, or otherwise in bad faith failed to comply with FOIA.

WHEREFORE, NIKLAS HUNDER asks that the Court:

i. declare that CTA has violated FOIA;

ii. order CTA to conduct an adequate search for the requested records;

iii. order CTA to produce all non-exempt portions of the requested records;

iv. enjoin CTA from withholding non-exempt public records under FOIA;

v. order CTA to pay civil penalties;

vi. grant remedial injunctive relief requiring CTA to comply with FOIA requirements and

monitor its compliance; and

vii. award such other relief the Court considers appropriate.

Dated: November 6, 2024

RESPECTFULLY SUBMITTED,

/s/ Niklas Hunder

Niklas Hunder Policy Analyst/Researcher

Exhibit 1



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

April 18, 2024

Via Electronic Mail

Nik Hunder nikhunder@gmail.com

Re: Freedom of Information Act Requests of April 11, 2024 and April 12, 2024

Dear Mr. Hunder,

This letter responds to the six (6) Freedom of Information Act ("FOIA") requests that the Chicago Transit Authority ("CTA") received from you between April 11, 2024 and April 12, 2024 that seek the following:

FOIA 2024-0445: A copy of the FOIA office's records of public requests and time to return each FOIA request from 1/1/24 to 3/31/24. I anticipate that this would include the following information: The date a FOIA request was submitted, when extension letters were sent, who the requestee was, what topic was information requested about, when the request was made, fuffilment date (files sent to requestee), if the request was either approved or denied, and whether the public access attorney interviened in the request. It may be also useful to provide if the requestee and FOIA office agreed to an extended deadline and what that deadline was. Please provide the requested records in the format used in CTA FOIA 2024-0113. [sic]

FOIA 2024-0446: At a monthly and quarter level, please provide leasing reports either from employees or an external contract broker that. The reports should be provided if any series of records contains infomation on leasing, negotations, tenant status, work orders, unit availability, denials to applications from potential tenants and the reason for denial. [sic]

FOIA 2024-0447: Please provide the number of flaggers the CTA has employed per month between 1/1/24 and 3/31/24. Include the number of employees that were terminated or transfered to another position within CTA. The record should include the breakdown of transfers by union and position as returned in CTA FOIAs 2023-1139 and 2023-1241. [sic]

FOIA 2024-0448: From 1/1/23 to 3/31/24, please provide the headcount of all rail operations staff per month broken down by Rapid Transit Operator, Combined Rail Operator, Combined Service Operator, Switch Worker, Tower Worker, and Extra Board. Please provide how many of each position was either terminated or resigned for each month and how many employeers were hired into any of those positions by month. [sic]

FOIA 2024-0449: From 1/1/23 to 3/31/24: Please provide when each Rail Operator training class took place, how many employees were enrolled, how many passed the class, and what positions they were hired into (RTO, CSO, CRO, extra board, tower, signal opertions, ect.) broken down by month [sic]

FOIA 2024-0451: By day from 1/1/24 untill seven calendar days before this request is filled, please provide the number of staff assigned to each rail terminal and bus garage (with each being broken down by assigned route) and how many employees called off at each location. Please provide the record showing how many excess staff were assigned by rail terminal and bus garage that were to cover for employees who had called off. Also provide documentation if it exists on how soon call offers were made and records that show violations of call out policy (along with a copy of that policy). [sic]

CTA is treating each of the above requests pursuant to 5 ILCS 140/3.2 and 2(g) based upon the seven (7) FOIA requests that you submitted between January 8, 2024 and January 11, 2024.

In accordance with that statute, CTA must respond to each of these requests within 21 business days after receipt. 5 ILCS 140/3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

Please contact me if you have any questions regarding your FOIA requests to CTA.

Sincerely,

Brigett R. Bevan Managing Attorney Compliance, Policy and Risk

Exhibit 2



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

June 27, 2024

Via Electronic Mail

Nik Hunder nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0662

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a FOIA request for the following records:

- Exit Surveys and employee satisfaction surveys administered by any CTA personnel after the employee was fired, terminated, resigned, discharged, etc. from 1/1/22 to 5 business days before this request is filled. In the event of documents that would typically be exempt under 5 ILCS 140/7(f), the head of the public body Dorval R. Carter referenced these documents in the Q2/May 2024 subject matter hearing held by the Committee on Transportation and Public Way on May 30th, 2024.
- Documents issued by the CTA Control Center called "CTA Control Center Alert" from 1/1/24 to 5 days before this request is filled. An example of matching records would be similar to those provided in response to CTA FOIA 0163. In the event of records that appear to be duplicated, please exclude the email version only if the original format is located. If multiple records are found for the same incident ID, only provide the final communication of each incident ID.

CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your several (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period

considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Ashley Neuhauser Managing Attorney Compliance, Policy and Risk

Exhibit 3



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

July 22, 2024

Via Electronic Mail

Nik Hunder nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0662

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a FOIA request for the following records:

- Exit Surveys and employee satisfaction surveys administered by any CTA personnel after the employee was fired, terminated, resigned, discharged, etc. from 1/1/22 to 5 business days before this request is filled. In the event of documents that would typically be exempt under 5 ILCS 140/7(f), the head of the public body Dorval R. Carter referenced these documents in the Q2/May 2024 subject matter hearing held by the Committee on Transportation and Public Way on May 30th, 2024.
- Documents issued by the CTA Control Center called "CTA Control Center Alert" from 1/1/24 to 5 days before this request is filled. An example of matching records would be similar to those provided in response to CTA FOIA 0163. In the event of records that appear to be duplicated, please exclude the email version only if the original format is located. If multiple records are found for the same incident ID, only provide the final communication of each incident ID.

As indicated in CTA's correspondence of June 27, 2024, CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your seven (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time, first, by notifying you that the second aspect of your request is unduly burdensome to process as it encompasses thousands of alerts that will need to be reviewed one by one for exempt information. CTA will also need to review every alert during this time period to identify only the final communication of each incident ID. 5 ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to attempt to reduce this aspect of your request to manageable proportions. Secondly, CTA is also providing you with an estimate of the time required by CTA to complete the processing of the

remainder of your request. CTA anticipates at this time that it will need until **August 19, 2024** to complete the remainder of your request.

CTA also estimates that there will be no fees charged in connection with this request.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Ashley Neuhauser Managing Attorney Compliance, Policy and Risk

Exhibit 4



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

October 4, 2024

Via Electronic Mail

Nik Hunder nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0662

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a FOIA request for the following records:

- Exit Surveys and employee satisfaction surveys administered by any CTA personnel after the employee was fired, terminated, resigned, discharged, etc. from 1/1/22 to 5 business days before this request is filled. In the event of documents that would typically be exempt under 5 ILCS 140/7(f), the head of the public body Dorval R. Carter referenced these documents in the Q2/May 2024 subject matter hearing held by the Committee on Transportation and Public Way on May 30th, 2024.
- Documents issued by the CTA Control Center called "CTA Control Center Alert" from 1/1/24 to 5 days before this request is filled. An example of matching records would be similar to those provided in response to CTA FOIA 0163. In the event of records that appear to be duplicated, please exclude the email version only if the original format is located. If multiple records are found for the same incident ID, only provide the final communication of each incident ID.

In partial response to your request, CTA performed a reasonable search and is providing you with the following:

 CTA's Employee Exit Survey. Please note, there are 39 position pages included. Once a survey taker indicates which department they work in, the survey automatically skips to the appropriate position page.

CTA is continuing to process the remainder of your request and will respond as soon as possible.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Ashley Neuhauser

Managing Attorney Compliance, Policy and Risk

Exhibit 5

CTA Exit Survey

Introduction

Thank you for participating in The Chicago Transit Authority's Employee Exit Survey. Your feedback is valuable to us. The Human Resources department is committed to better understanding workplace culture. Your candid responses will aid in providing recommendations for areas of improvement to enhance the employee experience.

Privacy & Data Usage

Your responses and comments are kept confidential. We do not include your identity in reports or give this info to your managers/supervisors. Your responses will not influence any possible future employment at the CTA.

This survey will take 10-15 minutes to complete. Please do not close this window or click the back button in your browser. Thank you in advance for your time.

•	Would you like to con	nplete this	voluntary	survey
	Yes			
	○ No			

CTA Exit Survey

Choose to answer with or without badge

Your responses and comments are kept confidential. We do not include your identity in reports or give this info to your managers/supervisors.

We average responses in our analysis.

Please contact us for questions or more info at TalentAssessmentAnalytics@transitchicago.com

- * How would you like to complete this survey?
 - Provide badge # (10 minute completion time; fewer questions)
 - On not provide badge # (15 minute completion time; more questions)

CTA Exit Survey

Demographics

For this survey to be helpful and accurate, it is important that you answer each question as honestly as possible.

To go back to the shorter, identified survey click the "previous" button at the bottom of the page.

of the page.	
What is your gender?	
○ Male	
Female	
Oecline to answer	
Other (please specify)	
What is your race or ethnicity?	
○ White or Caucasian	
Black or African American	
Hispanic or Latino	
Asian or Asian American	
American Indian or Alaska Native	
Native Hawaiian or other Pacific Islander	
Middle Eastern or North African	
Another race	
Oecline to answer	
In what year were you born? (Please enter a 4 digit birth year ex. 1976)	
Are you a veteran of the U.S. Armed Forces?	
○ Yes	
○ No	
Current guard, reserve, or active military	
O Decline to answer	
* This is too many questionsskip to the shorter identified survey? Yes No	

	CTA Exit Survey		
Employment Quest	ions		
To go back to the s reach question #2.	horter, identified survey click the "	previous" button u	ntil you
What was your yearly	/ CTA salary?		
Full Time Tempo	nployment type? nent (more than 32 hours per week) orary (more than 32 hours per week) han 32 hours per week)		
* For how many year	s were you employed at the CTA?		
0	25	50	

CTA Exit Survey
Work Information
What was your main work location?

CTA Exit Survey Badge Number * Please provide your 5 digit badge number

Demographics

For the following questions, please select the answer that most accurately applies to you.

u.	
* Which department did you mainly work in?	
605/629	General Counsel
Budget & Capital Finance	Human Resources
Bus Maintenance	Infrastructure Maintenance
Bus Operations	Innovation
Capital Construction	Legislative Affairs & GCR
Chief Administrative Officer	President's Office
Chief Engineer	Purchasing
Chief Financial Officer	Rail Maintenance
Chief Infrastructure Officer	Rail Operations
Chief Internal Audit	Rail Station Management
Chief Planning Officer	Red Purple Modernization
Chief Safety & Security Officer	Revenue and Fare Systems
Chief Strategy, Data & Technology Officer	Safety
Chief Transit Officer	Scheduling & Service Planning
Communications	Security
Control Center	Strategic Business Initiatives
CTA Board	Technology
Diversity	Training and Workforce Development
<u>EEO</u>	Transit Instruction
Equity and Engagement	

605/629

What was your position in the 605/629 department?	
Janitor (Rapid Transit)	
Other (please specify)	
	_

Positions Budget and Capital Finance

What was your position in the Budget and Capital Finance department?		
Budget Analyst	Project Manager, Grants	
Oirector, Budget & Management	Project Manager, Program Development	
Oirector, Capital Grants	Senior Analyst, Energy	
Financial Analyst II - Grants	Senior Budget Analyst	
Lead Budget Analyst	O Senior Manager, Capital Program Development	
CIP Control	Senior Manager, CIP Control	
Clead Financial Analyst - Grants	Senior Manager, Grants	
Project Manager, CIP Control	Vice President, Budget and Capital Finance	
Other (please specify)		
	<u>.</u>	

Positions Bus Maintenance

* What was your position in the	Bus Maintenance department?	
Assistant Chief Bus Equipment Engineer	Chief Bus Equipment Engineer	Mechanical Unit Assembler
B Electrician	Coordinator, Bus Maintenance	Mechanical/Electrical Engineer IV
Blacksmith & Welder	Coordinator, Personnel & Budget	Mobile Bus Mechanic
Blacksmith & Welder Foreperson	Electrical Worker	Painter (Various)
Bus & Truck Mechanic	Electrical Worker Leader	Painter Foreperson
Bus & Truck Mechanic	Engine Washer Equipment Technician I	Painter Leader Product Engineer III
Foreperson Bus & Truck Mechanic Leader	File Clerk (Comp)	Production Clerk - Bus
Bus Body Chassis Specialist	Foreperson Electrical Workers	Senior Garage Instructor
Bus Equipment Tech I	Garage Instructor I	Senior Manager, Maintenance - Bus
Bus Equipment Tech II	Garage Instructor II	Senior Manager, Maintenance
Bus Equipment Tech III	General Manager, Bus Engineering & Training	Instruction
Bus Handler	General Manager, Bus	Senior Project Manager, Bus Heavy Maintenance
Bus Mechanic	Maintenance	Senior Project Manager,
Bus Procurement Coordinator	Laborer (South Shops)	Vehicle Engineering
Bus Quality Improvement Coordinator	Machinist	Sheet Metal Worker
Bus Quality Improvement	Machinist Foreperson	Shop Inspector
Technician	Manager, Administration - Bus Maintenance	Tire Repairer
Bus Servicer	Manager, Maintenance - Bus	Training Specialist I - Bus
Bus Servicer Apprentice	Manager, Maintenance	Upholsterer
Carpenter 'A'	Instruction - Bus	Vehicle Maintenance Office Clerk
Carpenter Foreperson (S-	Manager, Quality	
Shops)	Improvement	Warranty Clerk
Carpenter Leader	Mechanical Officer - Bus	Warranty Technician
Other (please specify)		

Positions Bus Operations

What was your position in the Bus Operations department?	
Bus Operator	Manager, Bus Operations
Bus Service Supervisor I	Manager, Bus Supervision
Bus Service Supervisor II	Operations Business Manager
Cash Box Puller	Project Specialist II - Bus Operations
Chief Clerk (Bus)	O Senior Manager, Administration - Bus Operations
Clerk II (Bus)	Senior Manager, Bus Operations
Clerk III (Bus)	Senior Manager, Bus Supervision
Clerk IV (Bus)	Supervisor Clerk
General Manager, Bus Operations	Vice President, Bus Operations
General Manager, Bus Service Management	
Other (please specify)	

Positions Capital Construction

What was your position in Capital Construction?
Construction Project Manager I
Construction Project Manager II
Construction Project Manager III
General Manager, Capital Construction
Senior Project Manager - Construction
Other (please specify)

Positions Chief Administrative Officer

* What was your position in the Chief Administrative Officer department?		
Analyst, Performance Management	Executive Assistant II - Administration	
Chief Administrative Officer	O Senior Analyst, Performance Management	
Chief Operating Officer	O Senior Data Engineer	
Coordinator, Transit Asset Management Policy	Senior Data Scientist	
Oata Analyst, Asset Management	O Senior Manager, Asset Management	
Oata Engineer, Performance Management	Senior Project Manager, Administration	
Oirector, Performance Management		
Other (please specify)		
Coordinator, Transit Asset Management Policy Data Analyst, Asset Management Data Engineer, Performance Management Director, Performance Management	Senior Data Scientist Senior Manager, Asset Management	

Positions Chief Engineer

* What was your position in the Chief Engineer department?		
Architect Coordinator	Project Specialist II - Construction	
Architect III	Project Specialist II - Engineering	
Chief Engineer	Project Specialist II - Infrastructure	
Opputy Chief Engineer	Quality Assurance Design & Construction	
Electrical Engineer Coordinator	Coordinator	
Electrical Engineer III	Quality Assurance Inspector	
Engineer I - Structural	Rail Posting Specialist	
Engineer II - Structural	Senior Manager, Administration - Infrastructure	
Engineer II - Civil	 Senior Manager, Facilities Engineering & Technical Support 	
Engineer III - Civil	Senior Manager, Facilities Maintenance	
Engineer III - Structural	Engineering	
Engineer IV - Civil	Senior Manager, Quality Assurance & Program Certification	
Engineer IV - Structural	Senior Manager, Quality Inspections	
Engineering Assistant	Senior Manager, Structure Engineering	
Engineering Project Planning Coordinator	Senior Manager, Track/Civil Engineering	
Engineering Specification Writer	Signal Engineer I	
Facilities Quality Improvement Coordinator	Signal Engineer II	
First Deputy Chief Engineer	Signal Engineering Coordinator	
Manager, Infrastructure Budget & Contract Oversight	Specification/Quality Assurance Engineer IV	
Manager, Technical Documents & Utility	Testing Engineer I	
Management Documents & Othity	Testing Engineer II	
Mechanical Engineer II	Testing Engineer III	
Mechanical Engineer III	Testing Engineer IV	
Mechanical Engineer IV	Testing Engineer V	
O Project Manager, Engineering Safety Certification	Utilities Records Clerk	
Other (please specify)		
The state of the s	I I	

Positions Chief Financial Officer

* What was your position in the Chief Financia	l Officer department?
Accountant II	Manager, Property Accounting
Accountant III	Manager, Treasury Management
Accountant IV	Manager, Wage Rate Progression Administration
Accounts Receivable Accountant I	Money Handler I
Accounts Receivable Accountant III	Payroll Processing Clerk
Analyst II, Procurement Match	Payroll Specialist
Analyst, Payroll	O Procurement Match Clerk
Analyst, Procurement Match	O Property Accountant I
Analyst, Treasury	Property Accountant II
Chief Financial Officer	Property Accountant III
Contract Administrator	Property Accountant IV
Coordinator, Payroll Control	Senior Analyst, Payroll Control
Openty Chief Financial Officer / Comptroller	Senior Analyst, Treasury
Oirector, Accounting	Senior Contract Administrator
Oirector, Systems, Payables & Payroll	Senior Coordinator, Capital Funds
Oirector, Treasury	Senior Coordinator, Financial Audit Oversight
Executive Assistant II - Finance	Senior Coordinator, Vault Operations
Financial Systems Analyst III	Osenior Manager, Financial Review & Oversight
Financial Systems Business Analyst	Senior Manager, Financial Systems
Grant Accountant I	Senior Manager, Grant & Property Accounting
Grant Accountant II	Senior Manager, Payroll Exam & Operations
Grant Accountant III	Senior Project Manager, Debt Administration
Lead Accountant, Accounts Receivable	Treasury Clerk
Manager, Accounts Payable	Treasury Coordinator
Manager, Accounts Receivable	Treasury Equipment Specialist
Manager, Payroll Operations	
Other (please specify)	

Positions Chief Infrastructure Officer

* What was your position in the Chief Infrastru	acture Officer department?
Chief Infrastructure Officer	O Project Manager, Infrastructure Capital Controls
Oeputy Chief Engineer - RLE	Project Specialist II - Infrastructure Capital
Oirector, Community Relations - RLE	Finance
Oirector, Infrastructure Capital Program	Project Specialist II - Red Line Extension
Oversight	RLE Construction Project Manager
Oirector, Real Estate	Senior Manager, Infrastructure Operating Budget
Engineer III - Civil	Senior Manager, Property Maintenance
Executive Assistant I - Infrastructure	Senior Project Manager, Capital Controls - RLE
Executive Assistant II - Infrastructure	Senior Project Manager, Infrastructure
General Manager, Construction - RLE	Signal Engineering Coordinator
Manager, Property Management	Vice President, Capital Construction
Manager, Real Estate Services	Vice President, Community Relations
Project Consultant - Art	Vice President, Red Line Extension
Project Coordinator, Art	
Other (please specify)	

Positions Chief Internal Audit

* What was your position in the Chief Internal A department?	Audit
aopai mioni.	
Chief Internal Auditor	Senior Internal Auditor
Other (please specify)	

Positions Chief Planning Officer

* What was your position in the Chief Planning department?	g Officer
Chief Planning Officer	Manager, Ridership
Coordinator, Market Research	Project Manager - Planning
Oata Architect	Reception Clerk - RTW
Oata Collection Specialist	Senior Analyst, Ridership Reporting
Oata Modeler	O Senior Manager, Strategic Planning - Bus
Oirector, Ridership Analysis & Reporting	O Senior Manager, Strategic Planning - Rail
Oirector, Strategic Planning & Policy	Senior Project Manager, Planning
Geographic Information Systems Administrator	Senior Strategic Planner
Manager, Planning Administration	Strategic Planner
Other (please specify)	

Positions Chief Safety & Security Officer

* What was your position in the Chief Safety & Security Offi	.cer
department?	
Chief Safety & Security Officer	
Other (please specify)	

Positions Chief Strategy, Data & Technology Officer

What was your position in the Chief Strategy, Data & Te	echnology Officer department?
Chief Strategy, Data, & Technology Officer	
Other (please specify)	
	1

Positions Chief Transit Officer

* What was your position in the Chief Transit (Officer department?
Analyst, Transit Business Operations Chief Transit Officer	General Manager, Transit Ops Strategic & Business Operations
Executive Assistant II - Operations	Project Specialist II - Transit Operations Absenteeism
	Senior Administrator, Transit Operations
Other (please specify)	

Positions Communications

* What was your position in the Communications department?	
Business System Analyst, Customer Service	Manager, Customer Service
Communications Specialist	Manager, External Electronic Communications
Coordinator, Copy Center	Manager, Graphics
Coordinator, Graphics Production	Manager, Publications
Coordinator, Social Media	Manager, Reprographics
Copy Production Clerk	Manager, Signage & Wayfinding
Customer Service Information Specialist	Media Representative
Customer Service Representative I	Project Coordinator, Customer Feedback
Customer Service Representative II	Project Specialist II - Communications
Oirector, Communications & Media Relations	O Publications Representative
Oirector, Marketing	Reception Clerk - RTW
Electronic Communications Specialist	Reprographics Support Specialist
Environmental Graphic Designer	Senior Duplicating Mach Operator
General Manager, Customer Information	Senior Manager, Media Relations
General Manager, Customer Service	Senior Manager, Public Affairs
Graphic Designer	Vice President, Communications
Manager, Customer Feedback Programs	
Other (please specify)	
	<u></u>

Positions Control Center

* What was your position in the Control Center department?	
Bus Controller	Project Specialist II, Rail Operations
Control Center Communications Coordinator	Rail Controller
Oirector, Control Center Operations	Rail Customer Service Representative / Security
General Manager, Control Center	Controller
Manager, Control Center	Senior Manager, Administration - Control Center
O Power Controller	Senior Manager, Control Center
Other (please specify)	

Positions Diversity

* What was your position in the Diversity depar	rtment?
Certification Specialist	Manager, Diversity Certification Programs
Compliance Specialist	Manager, Small Business Development & Outreach
Coordinator, Small Business Development & Outreach	Manager, Workforce Initiatives
Coordinator, Workforce Initiatives	Project Specialist II - Diversity
Oata Analyst, Diversity Programs	Senior Certification Specialist
Oata Analyst II, Diversity Programs	Senior Compliance Specialist
Oirector, Diversity Programs	Senior Coordinator, Small Business Development
Manager, Diversity Compliance Programs	& Outreach Senior Manager, Certification & Compliance Programs
Other (please specify)	

Positions EEO

dej

ted below, select "Prev" at the bottom of the partment.	
* What was your position in the EEO departme	ent?
ADA Field Compliance Auditor	Oirector, EEO and Compliance Programs
Analyst, Compliance Programs	Senior Manager, Drug & Alcohol Programs
Coordinator, Compliance Programs	Sr Coordinator, EEO/Affirmative Action Programs
Ocordinator, Title VI and Affirmative Action	
Other (please specify)	

Positions Equity and Engagement

What was your position in the Equity and Engagement departme	nt?
Chief Equity & Engagement Officer	
Other (please specify)	

Positions General Counsel

* What was your position in the General Counsel department?	
Assistant Freedom of Information Officer	General Counsel
Associate Attorney - Corporate	Legal Assistant
Associate Attorney - Labor & Employment	Legal Assistant - Docketing Specialist
Associate Attorney - Torts	Legal Assistant - Labor and Employment
Chief Attorney - Compliance, Policy & Appeals	Legal Assistant - Subrogation
Chief Attorney - Corporate	Manager, Contract & Labor Relations
Chief Attorney - Labor & Employment	Manager, Worker's Compensation - Claims
Chief Attorney - Torts	Managing Attorney - Corporate
Chief Attorney - Worker's Compensation	Managing Attorney - Labor & Employment
Chief Attorney - Workers' Compensation Claims	Managing Attorney - Torts
Claims Accident Clerk	Managing Attorney - Worker's Compensation
Claims Adjuster	Project Specialist I - Litigation
Claims Representative	Project Specialist II - Claims
Compliance Clerk	Project Specialist II - FOIA and Law
Contract & Labor Relations Representative	Administration
Coordinator, Claims	Project Specialist II - Law
Coordinator, Insurance Controls	Project Specialist II - Law Administration Support
Coordinator, Labor Relations & Due Process	Project Specialist II - Workers' Compensation
Coordinator, Law Administration	Project Specialist II - Worker's Compensation Investigations
Coordinator, Leave Management	Regulatory Compliance Officer
Coordinator, Litigation	Risk Compliance Officer
Coordinator, Paralegal Support	Senior Analyst, Claims/Enforcement
Coordinator, Policy, Appeals, & Compliance	Senior Attorney - Enforcement
Coordinator, Risk Management Information Systems	Senior Attorney - Labor & Employment
Data Entry Clerk	Senior Attorney - Torts
	Senior Attorney - Worker's Compensation
Deputy General Counsel - Corporate	Senior FOIA, Compliance, & Appeals Attorney
Deputy General Counsel - Labor & Employment	Senior Manager, Claims
Deputy General Counsel - Torts	Senior Manager, Law Administration

Deputy General Counsel, Compliance, Policy & Appeals	Senior Manager, Regulatory Compliance
Director, Freedom of Information Compliance Director, Labor Relations Director, Worker's Compensation Executive Assistant II - Law	Senior Paralegal - Corporate/Labor Senior Paralegal - Torts Senior Paralegal - Workers' Compensation Video Surveillance Specialist
Other (please specify)	

Positions Human Resources

What was your position in the Human Resources department?	
Analyst I, HRIS	Manager, Talent Acquisition Administration
Analyst II, HRIS	Manager, Talent Assessment & Analytics
Analyst III, HRIS	Manager, Wellness
Analyst, Compensation	Project Manager, Marketing Outreach and
Analyst, Talent Acquisition	Engagement
Analyst, Talent Assessment & Analytics	Reception Clerk - RTW
Benefits Services Specialist	Senior Analyst, HR Services
Coordinator, HR Marketing, Outreach, &	Senior Analyst, HRIS Reporting
Engagement	Senior Coordinator, Benefits
Coordinator, Leave Management	Senior Coordinator, Compensation
Coordinator, Office Administration	Senior Coordinator, HR Marketing, Outreach, &
Coordinator, Talent Acquisition	Engagement
Coordinator, Talent Assessment & Selection	Senior Coordinator, Leave Management
Director, Compensation, Benefits & HRIS	Senior Coordinator, Substance Abuse
Director, Talent Acquisition	Senior Coordinator, Talent Assessment & Analytics
Oirector, Talent Assessment & Analytics	Senior Manager, Benefit Services
Graphic Designer	Senior Manager, HRIS
HR Receptionist	Senior Manager, Marketing, Outreach and
HR Specialist - Talent Acquisition	Engagement
Human Resources Assistant - Employee Records	Senior Manager, Talent Acquisition
Human Resources Specialist - Administration	O Senior Manager, Talent Assessment & Analytics
Manager, Compensation and Benefits	Senior Talent Acquisition Specialist
Manager, Employee Relations	Ospecialist, Marketing Outreach and Engagement
Manager, Talent Acquisition	O Specialist, Talent Assessment and Analytics
	Talent Acquisition Specialist
	Vice President, Human Resources
Other (please specify)	

Positions Infrastructure Maintenance

* What was your position in the Infrastructure I	Maintenance department?
Assistant Foreperson Steel Fabrication Shop	Mason Foreperson
B Electrician	Material & Assignment Dispatcher
B Electrician (Light Maintenance)	Painter
B Electrician (Substation Maintenance)	Painter Foreperson
Blacksmith & Welder (Frog Shop)	Plumber
Bricklayer	Plumber Foreperson
Bricklayer Helper	O Power Engineer IV
Building Operating Engineer	Revenue Equipment Line Worker
Bus & Truck Mechanic	Revenue Equipment Specialist
Carpenter	Roadmaster II
Carpenter Foreperson	Roadmaster III
Chief Operating Engineer	Senior Manager, Facilities Maintenance
Ocordinator, Facilities Administration Support	Senior Manager, Facilities Maintenance Services
Coordinator, Maintenance Contracts	Osenior Manager, Facility Contracts & Oversight
Coordinator, Non-Revenue Fleet Services	Senior Manager, Signal Maintenance
Coordinator, Power & Way Administrative Support	Senior Manager, Structural Maintenance
Electrical Maintainer Specialist	Senior Manager, Substation & Power
Electrical Worker Facilities	Maintenance
Escalator Mechanic	Senior Manager, Systems Support
Escalator/Elevator Inspector	Senior Manager, Track Maintenance
Facilities Posting Specialist	Senior Manager, Utility Services
File Clerk (Comp)	Senior Power & Way Support Coordinator
Foreperson B Electricians	Senior Utility Service Coordinator
Foreperson 'B' Electricians	Service Truck Chauffeur I
Foreperson Escalator Mechanic	Sheet Metal Foreperson
Foreperson Steel Fabrication Shop	Sheet Metal Worker
General Manager, Facilities Maintenance	Signal Foreperson
General Manager, Power & Way Maintenance	Signal Helper
() Ironworker	Signal Maintainer

Ironworker Foreperson	Signal Maintenance Coordinator
Ironworker General Foreperson	Signal Relay Foreperson
Cline Foreperson	Stationary Engineer
Cline Worker	Steamfitter (General Maintenance)
Line Worker Helper	Steamfitter (Heating & Air Conditioning)
Machinist	Steamfitter Foreperson
Machinist (Building)	Structure Maintenance Coordinator
Machinist (Frog Shop)	O Substation Attendant
Machinist Foreperson	Supervisory Chauffeur-K202
Manager, Application Support	Track Maintenance Coordinator
Manager, Escalator/Elevator	Track Maintenance Equipment Operator
Manager, Facilities Maintenance	Track Welder
Manager, Facility Contracts & Oversight	Track Worker
Manager, Non-Revenue Fleet Services	Work Car Crane Operator
Other (please specify)	

Positions Innovation

What was your position in the Innovation dep	artment?
Bus Rev Equip Field Technician	Project Manager, Operations Innovations
Bus Rev Equip Shop Technician	Project Manager, Retail Programs
Chief Innovation Officer	Project Specialist I - Innovation Office
Coordinator, Market Research	Rev Systems Engineer IV
Oirector, Marketing	Revenue Testing Technician
General Manager, Fare Systems Operations	Senior Coordinator, Fare Systems - Innovations
C Lead Business Systems Analyst, Innovations	O Senior Coordinator, Fare Systems - Service Level
Manager, Fare Systems - Revenue and Payment	Senior Manager, Customer Insights & Strategy
Management	Senior Manager, Maintenance - Bus Fare Systems
Manager, Maintenance - Bus Fare Systems Garage	Senior Product Manager, Fare Systems Innovations
Manager, Maintenance - Bus Fare Systems Shop	Senior Project Manager, Fare Systems -
Project Manager, Customer Experience	Innovations
Innovations	Vice President, Innovation
Project Manager, Marketing	
Other (please specify)	

Positions Legislative Affairs & GCR

* What was your position in the Legislative Affa	airs & GCR department?
Director, State Legislative Affairs Government & Community Liaison Project Consultant - Legislative Affairs	Senior Advisor, Federal Affairs & Funding Programs Vice President, Legislative Affairs
Other (please specify)	

Positions President's Office

partment.	
* What was your position in the President's Office department?	
Chief of Staff	Senior Administrator, President's Office
President	O Special Assistant to the President-Scheduler
Other (please specify)	
	<u>.</u>

Positions Purchasing

What was your position in the Purchasing dep	partment?
Administrator, Capital Procurement	Order Control Clerk I
Administrator, Procurement	Order Control Clerk II
Analyst, Business Systems - Procurement	Project Coordinator, Supply Chain Operations
Business Analyst, Business Systems	Project Specialist I - Purchasing
Business Analyst, Procurement Systems	Project Specialist II - Warehouse
Business Analyst, Supply Chain Operations	Salvage Control Clerk
Business Systems Analyst III	O Senior Administrator, Capital Procurement
Coordinator, Administrative Programs	Senior Administrator, Procurement
Coordinator, Buyer	Senior Buyer
Coordinator, Inventory Control - Supply Chain	Senior Combination Clerk
Coordinator, Office Administration	Senior Coordinator, Procurement
Coordinator, Records Center	Senior Coordinator, Supply Chain
Coordinator, Supply Chain Vendor Performance	Senior Manager, Procurement
Coordinator, System Projects	Senior Manager, Procurement & Business
Oirector, Supply Chain	Systems
General Manager, Supply Chain	Senior Manager, Supply Chain
Carlo Lead Administrator, Procurement	Senior Manager, Supply Chain Vendor Performance
Manager, Contract Administration	Shipping Clerk
Manager, Purchasing	Specialist, Contract Utilization
Manager, Supply Chain Operations	Stockroom Clerk - Bus
Material Coordinator I - Rail	Stockroom Clerk I
Material Coordinator II	Stockroom Clerk II
Material Handler I	Unit Exchange Clerk I - Rail
Material Handler II	Vice President, Purchasing
	Warehouse Worker I
Other (please specify)	
The state of the s	The state of the s

Positions Rail Maintenance

* What was your position in the Rail Maintenance department?	
Analyst, Data Control System - Rail	Motor Cleaner
Assembler Helper	Painter (Various)
Assistant Chief Rail Equipment Engineer	Painter Foreperson
B Electrician	Painter Leader
Blacksmith & Welder (Skokie)	Production Clerk - Rail
Blacksmith & Welder Foreperson	Project Manager, Rail Heavy Maintenance
Car Repairer 'A'	Rail Carbody Inspector
Car Servicer	Rail Controls Inspector
Car Servicer Apprentice	Rail Equipment Engineer II
Carpenter 'A'	Rail Equipment Engineer IV
Carpenter Foreperson (Skokie)	Rail Equipment Tech III
Carpenter Leader	Rail HVAC Repairer
Chief Rail Equipment Engineer	Rail Leader/Pilot
Coordinator, Personnel & Budget	Rail Maintenance Terminal Office Clerk
Coordinator, Rail Car Appearance	Rail Quality Improvement Coordinator
Electrical Engineer III	Rail Quality Improvement Technician
Electrical Worker	Rail Technician
Electrical Worker Leader	Rail Truck Shop Repairer
File Clerk (Comp)	Senior Manager, Administration - Vehicle
Foreperson Electrical Workers	Maintenance
General Manager, Rail Engineering & Instruction	Senior Manager, Maintenance - Rail
General Manager, Rail Maintenance	Senior Manager, Maintenance Instruction
Inspection Terminal Instructor I	Senior Manager, Rail Car Appearance
Inspection Terminal Instructor II	Senior Manager, Technical Services - Rail
Laborer	Senior Project Manager, Vehicle Engineering
Machine Shop Foreperson (Skokie)	Senior Project Manager, Vehicle Procurement
Machinist (Rail)	Sheet Metal Worker
Machinist Leader A	Shop Records Clerk
	Sign & Display Painter

Manager, Administration - Bus & Rail Maintenance	Sub Assembler
Manager, Maintenance - Rail Manager, Maintenance Instruction - Rail Manager, Rail Car Appearance Mechanical Officer - Rail	Technical Trainer - Rail Testing Engineer II Tool Maker Vehicle Maintenance Office Clerk Warranty Technician
Mechanical/Electrical Engineer III	- Martany resimilating
Other (please specify)	

Positions Rail Operations

* What was your position in the Rail Operations	s department?
Administrative Secretary	Rail Service Supervisor III
Chief Clerk (Rail)	Rail Terminal Supervisor
Combined Rail Operator	Rapid Transit Operator
Oirector, Service Delivery - Rail Operations	Reception Clerk - RTW
C Extra Board	Senior Manager, Administration - Rail Operations
File Clerk (Comp)	Senior Manager, Transportation - Rail
○ Flagger	Senior Project Manager, Rail Capital Project
General Manager, Rail Operations	Oversight
General Manager, Rail Operations Capital Project	Switch Worker
Oversight	O Tower Worker
Manager, Administration - Rail	Training & Instruction Administration Assistant
Manager, Transportation - Rail	Universal Rail Supervisor I
Project Specialist II, Rail Operations	Universal Rail Supervisor II
Rail Capital Oversight Project Manager	Vice President, Rail Operations
Rail Clerk II	Work Train Conductor
Rail Clerk III	Yardmaster
Rail Service Supervisor II	
Other (please specify)	

Positions Rail Station Management

* What was your position in the Rail Station N	Management
department?	
Customer Service Assistant	Manager, Rail Station Management
Customer Service Representative	Project Specialist II - Rail Station Management
Facilities Posting Specialist	Rail Janitor Apprentice
General Manager, Project Services & Special	Rail Janitor Coordinator
Events	Rail Posting Specialist
General Manager, Rail Station Management	Senior Manager, Administration - Facilities
Janitor (Buildings & Grounds)	Senior Manager, Administration - Rail Station
Janitor (Rapid Transit)	Management
Laborer (Building)	Senior Manager, Rail Station Management
Manager, Administration - Rail Station Management	Vice President, Rail Station Management
Manager, Land Services	
Other (please specify)	

Positions Red Purple Modernization

* What was your position in the Red Purple Mo department?	dernization
Civil Engineering Coordinator Communications Representative - RPM Community Liaison - RPM	Roadmaster II RPM Construction Project Manager Senior Project Manager, Capital Controls - RPM
Director, Communications & Media Relations - RPM Director, Community Relations - RPM	Senior Project Manager, Construction - RPM Sr Project Manager, Construction Safety & Security - RPM
Director, Red Purple Modernization Administration General Manager Construction - RPM General Manager, RPM Operations & Communication Coordination	Structure Engineering CoordinatorTrack WorkerVice President, Modernization Project
Project Manager, Capital Controls - RPM Other (please specify)	

Positions Revenue and Fare Systems

* What was your position in the Revenue and F	are Systems department?
Project Coordinator, Business Development	Senior Analyst, Fare Systems - Programs
O Project Manager, Fare Systems - Contracts	Senior Manager, Business Development
Project Manager, Fare Systems - Customer	Senior Manager, Fare Systems - Programs
Service Project Manager, Marketing & Business Development	Senior Project Manager, Business Development
O Project Specialist II, Fare Systems - Programs	
Other (please specify)	

Positions Safety

* What was your position in the Safety departm	ent?
Coordinator, Construction Safety	Senior Analyst, Safety Assessment
Coordinator, Safety Programs	Senior Coordinator, Construction Safety
Emergency Preparedness Officer	Senior Data Analyst - Safety
Environmental Compliance Officer	Senior Industrial Hygienist
Executive Assistant II - Safety	Senior Manager, Construction Safety & Safety
Fire & Life Safety Marshal	Certification
General Manager, Construction Safety &	Senior Manager, Environmental Compliance
Engineering	Senior Manager, Safety Assessment & Audit
General Manager, Occupational Safety &	Senior Manager, Safety Management System
Environment	Senior Manager, Transit System Safety
General Manager, Safety Analytics & Regulatory Oversight	Senior Project Manager, Safety & Security
General Manager, Safety Programs & Culture	Senior Project Manager, Safety & Security Certification
General Manager, Transit System Safety	Senior Reporting Analyst
Occupational Safety Officer	
Project Consultant - Buildings & Grounds Security	Senior Transit System Safety Officer
Project Consultant - Transit Safety	Transit System Safety Officer
Reporting Analyst	Vice President, Safety
Other (please specify)	

Scheduling & Service Planning

st What was your position in the Scheduling &	Service Planning department?
Analyst, Bus Scheduling	Rail Scheduler I
Analyst, Rail Scheduling	Rail Scheduler II
Bus Scheduler I	Senior Manager, Bus Scheduling Design &
Bus Scheduler II	Development
Coordinator, Bus Special Schedules	Senior Manager, Rail Scheduling Design & Development
Coordinator, Rail Scheduling Design & Development	Senior Manager, Service Planning
Coordinator, Special Services Planning	Senior Manager, Traffic Planning
Coordinator, Traffic Planning	Senior Project Manager, Transportation Engineering
Oirector, Scheduling	Service Planner I - Bus
Oirector, Service Planning & Traffic Engineering	Service Planner I - Rail
Lead Bus Scheduler	Service Planner II - Bus
Lead Rail Scheduler	System Administrator III - AVAS
Lead Service Planner	Traffic Planner II
Manager, ADA Compliance Programs	Transit Systems Architect
	Vice President, Planning
Other (please specify)	

Positions Security

What was your position in the Security depart	ment?
Analyst, Security	Manager, Security Contracts Administration
Coordinator, Facilities Security	Security Specialist
Coordinator, Security Contracts	Senior Coordinator, Facilities Security
General Manager, Security	Senior Manager, Facilities Security
O Investigator	O Senior Manager, Investigations & Liaison
Manager, Facilities Security	O Vice President, Security
Other (please specify)	

Positions Strategic Business Initiatives

partment.	
* What was your position in the Strategic Busin	es Initiatives department?
Business Process Analyst	O Project Manager, Strategic Business Initiatives
Coordinator, Strategic Business Initiatives	Senior Analyst, Data Analytics
Oirector, Strategic Business Initiatives	Senior Project Manager, IT
Project Consultant - Strategic Business Initiatives	
Other (please specify)	
	<u>-</u>

Positions Technology

* What was your position in the Technology dep	partment?
Communications Technician	Senior Coordinator, Video Systems
Coordinator, IT Contract Services	Senior Information Security Officer
Coordinator, IT Financial Audit & Compliance	Senior Manager, Enterprise Applications
Coordinator, Telecommunication Systems	Senior Manager, IT Project Management Office
Oatabase Administrator III - Oracle	Senior Manager, IT Project Resources
Oatabase Administrator III - Shared Services	Senior Manager, IT Support
O Database Administrator III - SQL	Senior Manager, Telecommunications
Oirector, Data Center & IT Support	Senior Manager, Transit Systems Support
Oirector, Enterprise Applications & IT PMO	Senior Mobility Administrator
Oirector, Technology Engineering	Senior Network Engineer
Engineer II, Communications	Senior Project Manager, IT
Foreperson Communications Tech	Senior Project Manager, Technology
_ Line Foreperson	System Administrator II
Manager, Communications Systems Maintenance	System Administrator II - Control Center
Manager, Control Center Systems	System Administrator II - ESuite
Manager, IT Procurement	System Administrator III
O Programmer Analyst III - Transit Systems	System Administrator III - ESuite
O Project Specialist II - Information Technology	System Analyst II
Project Specialist II - Technology	Systems Administrator III - Control Center
Rev Systems Engineer IV	Telecom Engineer
Senior Coordinator, Network Systems	Telephone Line Worker
Senior Coordinator, Optical Network Systems	Ovice President, Technology
Senior Coordinator, Technology Services	
Other (please specify)	
	I I

Positions Training and Workforce Development

st What was your position in the Training and W	orkforce Development department?
Coordinator, Business Administration	Manager, Second Chance Programs
Ocordinator, Curriculum Development - eLearning	Manager, Technical Writing
Coordinator, Curriculum Development - QC	Second Chance Program Training Specialist
Coordinator, Internship & Educational Programs	Second Chance Programs Training Specialist
Coordinator, Safety Training and Quality Control	Senior Manager, Administration - TWD
Coordinator, Second Chance Programs	Senior Manager, Career and Leadership
Coordinator, Technical Writing and Quality	Development Programs
Control	Senior Manager, Instructional Design
Oirector, Learning & Support	Senior Manager, Safety & Security Training Programs
Oirector, Workforce Partnerships	Flograms
Executive Assistant I - Training and Workforce	Staff Assistant - Second Chance Program
Development	Staffing Specialist, Training & Workforce Development
Instructional Designer	
Manager, Career & Leadership Development	Training Specialist I - Safety
Programs	Training Specialist II
Manager, Internship & Educational Programs	Training Specialist, Internship & Educational
Manager, Second Chance Program	Programs
	Vice President, Training & Workforce Development
Other (please specify)	

Positions Transit Instruction

* What was your position in the Transit Instruc	tion department?
Bus Instructor I	Manager, Rail Instruction
Bus Instructor II	Rail Instructor I
Bus Operator	Rail Instructor II
Coordinator, Administration Support - Rail	Rail Instructor III
Oirector, Training and Instruction	Senior Manager, Bus Instruction
○ Key Instructor	Senior Manager, Rail Instruction
Manager, Administration - Transit Instruction	Temporary Rail Instructor
Manager, Bus Instruction	Training and Instruction Clerk
Other (please specify)	

General Employment

or the following questions, please select or fill in the answer that most accurately oplies to you.	
* Please indicate your reason for leaving the CTA.	
◯ I am retiring	
Leaving with another opportunity	
Leaving without another opportunity (please indicate reasoning)	
	_
	_

you have accepted another position, what doe a to accept its offer? Select all that apply Better commute/location Career growth Management Salary Benefits Other (please specify)	es your new company offer that encouraged Schedule Flexibility Work/Life balance Remote Work Options Technology Resources
a to accept its offer? Select all that apply Better commute/location Career growth Management Salary Benefits	Schedule Flexibility Work/Life balance Remote Work Options
Career growth Management Salary Benefits	Work/Life balance Remote Work Options
Management Salary Benefits	Remote Work Options
Salary Benefits	
Benefits	Technology Resources
Other (please specify)	
The state of the s	
there anything that would have changed your Yes No	mind about leaving?
es, please elaborate.	
ould you consider coming back to work here is	n the future?
Yes	
No	
y or why not?	

General Employment continued

hy did you initia	ally join the CTA	?
		<i>a</i>
* How long did y	ou initially plan	on staying at the CTA?
My whole care	eer	
I did not have	a plan	
A specific amo	ount of time (enter a	number of years below)

Satisfaction

Please indicate your level of agreement with the following statements.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
I was satisfied with my work-life balance	\bigcirc			\bigcirc	
I was satisfied with leadership	\bigcirc			\bigcirc	
I was satisfied with my job responsibilities			\circ		
I was satisfied with how my team worked together	\bigcirc		\bigcirc	\bigcirc	
I was satisfied with the resources provided to me					
I was satisfied with the level of recognition I received for my work	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc

		CTA Exit S	Survey		
ngagement					
lease indicate your	_	ement with the	following stater	ments.	
	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
I wanted to go to work most days	\bigcirc				\bigcirc
I felt that my job had a meaningful impact to the CTA	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc
I felt happy when I was immersed in my work	\circ	\circ	\circ	\circ	\circ
I was bored at my			\bigcirc		

Please provide any additional comments or feedback	k regardi
	<u> </u>

		CTA Exit S	Survey		
Performance					
Please indicate you	r level of agree	ement with the	following state:	nents.	
	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
I could have been more productive at my job	\bigcirc	\bigcirc	\circ	\bigcirc	\bigcirc
I was able to complete my work within the required time frame	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc
I achieved my work goals to the best of my ability	\bigcirc	\bigcirc	\circ	\bigcirc	
I felt that my skills were put to use at the CTA	\bigcirc	\bigcirc	\bigcirc	\bigcirc	

Please provide any additional comments or feedback	regarding your performance.

Leadership

CTA Exit Survey

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
My manager gave me appropriate feedback	\bigcirc	\bigcirc	\bigcirc	\bigcirc	
My manager made reasonable decisions			\bigcirc		\bigcirc
My manager gave me the tools to become successful at the CTA	0	\circ	\circ	\circ	\bigcirc
was comfortable communicating with my manager	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc
lease provide any a	dditional com	nments or recon	nmendations re	garding lead	ership.

Professional Experience

Please indicate your level of agreement with the following statements.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
I was able to grow my skills and knowledge at the CTA			\circ	\bigcirc	
I was given the same expectations as other employees in my position		\bigcirc	\bigcirc	\bigcirc	
I felt my salary for my position was fair					\bigcirc
The CTA provided adequate training and resources for my development	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc
Please provide any ad experience at the CTA		ents or recom	mendations re	garding your p	orofessional

	CTA Exit Survey						
Team							
Please indicate your	level of agree	ement with the	following state:	ments.			
	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree		
I was an important part of my team's success	\circ	\bigcirc	\bigcirc	\bigcirc	\bigcirc		
My team and I worked well together	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc		
I had a good relationship with my team members	\circ	\circ	\circ	\circ	\circ		
I felt everyone on my team contributed	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\circ		
Please provide any a	dditional com	nments or recon	nmendations re	garding your	team.		

		CTA Exit Survey					
Safety							
Please indicate your	level of agree	ement with the	following stater	ments.			
	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree		
I was trained on CTA safety		\circ			\bigcirc		
I was comfortable voicing concerns about my workplace safety	\bigcirc	\bigcirc	\bigcirc	\bigcirc	\bigcirc		
Incidents and accidents were investigated quickly to improve workplace safety	0	\circ	0	0			
I did not fear for my personal safety at the CTA	\bigcirc	\bigcirc	\circ	\bigcirc	\bigcirc		
Please provide any a	additional com	nments or recon	nmendations re	garding safet	y.		

Conclusion

st How likely is it that you would recommend the Chicago Transit Authority to a friend or colleague?

Not at all likely Extremely likely

	1	1	2	3	4	5	6	7	8	9	10
--	---	---	---	---	---	---	---	---	---	---	----

Thank You!

Thank you for taking the time to complete this employee exit survey. Your feedback is very important to us. Further, we wish you well in your future endeavors.

Please email talentassessmentanalytics@transitchicago.com with any questions.

Exhibit 6

From: "Nik Hunder" < nikhunder@gmail.com>
To: FOIA < FOIA@transitchicago.com>

Date: 9/9/2024 3:37:02 PM

Subject: Re: FOIA 2024-0662 - RE: Hunder 6-19-24 Exit Surveys and ControlCenter Alerts

Hi,

I wanted to check-in to see if this was reasonable.

-Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him

On Tue, Aug 20, 2024 at 4:41 PM Nik Hunder < nikhunder@gmail.com > wrote:

I'll take a one-month sample from 4/1/24 to 4/30/24 and if the records are what I am hoping for, I'll make a separate follow-up request in the future. If it's not any faster to reduce to just Red and Blue Line alerts, this narrowed range should include all lines.

Alternatively, since you have a better understanding of the system, you could just propose something that is not burdensome to you and I could see if that would work.

-Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him

On Tue, Aug 20, 2024 at 4:06 PM FOIA < FOIA@transitchicago.com > wrote: Mr. Hunder,

I have been continuing to look into this request. Your narrowed request still encompasses thousands and thousands of notifications. The reporting functionality for our internal control center alert system is not able to provide only final communications. In addition, providing only Red and Blue incidents is a manual process as this requires the information to be filtered by "message title" and there are numerous different message titles that may or may not uniformly indicate that the incident involved the Red or Blue Lines, so each message title needs to be reviewed individually for responsiveness. Given the manual process and review required, please let me know if you are able to reduce your request further. Given the complexities with the reporting functionality of this system, my suggestion would be to reduce the timeframe further to get to a more manageable amount of data/notifications.

Thanks,

Ashley P. Neuhauser

Managing Attorney - Compliance, Policy & Risk

Chicago Transit Authority, Law Department

567 W. Lake Street, 6 th Floor, Chicago, IL 60661
T 312.681.2809 F 312.681.2809 FOIA@transitchicago.com
From: Nik Hunder < nikhunder@gmail.com >
Sent: Friday, August 2, 2024 8:11 AM To: FOIA <foia@transitchicago.com></foia@transitchicago.com>
Subject: Re: FOIA 2024-0662 - RE: Hunder 6-19-24 Exit Surveys and Control Center Alerts
EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.
Hi Ashley,
Were you able to determine if the narrowed request is reasonable?
Best,
Nik
NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him
On Fri, Jul 26, 2024 at 5:00 PM FOIA < FOIA@transitchicago.com > wrote:
Ok, I will need to see if your narrowed request is doable using the internal control center alert system. The number of customer alerts you are seeking is not representative of how many internal control center
alerts there are. They are independent systems of each other and don't generate the same alerts.
I will circle back with you next week.
Thanks,

Ashley P. Neuhauser

Managing Attorney - Compliance, Policy & Risk

Chicago Transit Authority, Law Department

567 W. Lake Street, 6th Floor, Chicago, IL 60661

T 312.681.2809 | F 312.681.2809 | FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com >

Sent: Friday, July 26, 2024 4:46 PM
To: FOIA < FOIA@transitchicago.com >

Subject: Re: FOIA 2024-0662 - RE: Hunder 6-19-24 Exit Surveys and Control Center Alerts

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345

Oops I think I might have miscommunicated that.

I was just using @ctaalert as a reference to show what I thought I was able to get the number of requests down to and because its publically available. I am looking for the internal communications issued to staff from the CTA Control Center. I already have the final alerts issues from by the customer alert system. No need to include anything from the customer alert system.

-Nik

NIK HUNDER LEED GREEN ASSOC.

Policy Analyst/Researcher

Fabrication Engineer

(440) 600-4413

he/him

On Fri, Jul 26, 2024 at 4:41 PM FOIA < FOIA@transitchicago.com > wrote:

Hi Mr. Hunder,

Thanks for reducing. Based on your most recent email, I understand you are now referring to the @ctaalert account which is for customer alerts. We are able to process your narrowed request using customer alert data. We should be able to produce this data in excel. Based on your initial request, I thought you might be asking for CTA internal Control Center alerts. When looking at the reporting/ exporting capabilities of the customer alerts system vs. the internal Control Center alerts system, your request is much more manageable using the customer alerts system.

I will proceed with processing your request using customer alert data with the parameters you provided in your last email.

Thanks,

Ashley P. Neuhauser

Managing Attorney - Compliance, Policy & Risk

Chicago Transit Authority, Law Department

567 W. Lake Street, 6th Floor, Chicago, IL 60661

T 312.681.2809 | F 312.681.2809 | FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com > Sent: Monday, July 22, 2024 4:59 PM
To: FOIA < FOIA@transitchicago.com >

Subject: Re: FOIA 2024-0662 - RE: Hunder 6-19-24 Exit Surveys and Control Center Alerts

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hey Ashley,

Let's see how I can reduce this. From what I can see, @ctaalert issued ~1300 alerts between 1/1/24 and 6/30/24. If there are more than 1300 alerts than this found by you, that's concerning. First, let's make the time frame 3/1/24-6/30/24. Then, limit the request to just Red and Blue line alerts. That should take the number of alerts down to ~450. Since most of these alerts are short, they should fall under the 30-hour accepted standard for burdensome.

Without explaining the exact content of the alerts you found in your research, can you highlight (across a small sample size) what the difference may be between a first alert and a final alert? I originally stated only final requests because CTA's website seems to indicate that alerts are constantly updated (see https://www.transitchicago.com/travel-information/alert-detail/?AlertId=101087 from Saturday the 20th) and a comprehensive final version is issued. If in your determination, no significant details are missing (such as a struck person or detailed train) from the original alert. I may be able to spare you from sorting through multiple versions. A detail that may help determine that decision is if the alerts come in a PDF (hard to manipulate) or a data format that could be manipulated such as an Excel spreadsheet or linked format used by a rail management system. If there are multiple data formats available, I could specify which one I would like. I only happen to know of the PDF versions.

I'm okay with agreeing to an 8/19/24 deadline for part 1 of the request.

Let me know what you know and if this makes your job easier,
Nik
NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him
On Mon, Jul 22, 2024 at 4:33 PM FOIA < FOIA@transitchicago.com > wrote:
Mr. Hunder,
Please find attached correspondence regarding your FOIA request to CTA.
Sincerely,
Ashley P. Neuhauser
Managing Attorney - Compliance, Policy & Risk
Chicago Transit Authority, Law Department
567 W. Lake Street, 6 th Floor, Chicago, IL 60661
T 312.681.2809 F 312.681.2809 <u>FOIA@transitchicago.com</u>
From: FOIA < <u>FOIA@transitchicago.com</u> >
Sent: Thursday, June 27, 2024 4:15 PM
To: 'Nik Hunder' < <u>nikhunder@gmail.com</u> > Subject: RE: Hunder 6-19-24 Exit Surveys and Control Center Alerts
Mr. Hunder,
Please find attached correspondence regarding your FOIA request to CTA.
Sincerely,

Ashley P. Neuhauser

Managing Attorney - Compliance, Policy & Risk

Chicago Transit Authority, Law Department

567 W. Lake Street, 6th Floor, Chicago, IL 60661

T 312.681.2809 | F 312.681.2809 | FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com > Sent: Wednesday, June 19, 2024 4:59 PM To: FOIA < FOIA@transitchicago.com >

Subject: Hunder 6-19-24 Exit Surveys and Control Center Alerts

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hello,

I would like to make a FOIA request for the following records:

- Exit Surveys and employee satisfaction surveys administered by any CTA personnel after the employee was fired, terminated, resigned, discharged, etc. from 1/1/22 to 5 business days before this request is filled. In the event of documents that would typically be exempt under 5 ILCS 140/7(f), the head of the public body Dorval R. Carter referenced these documents in the Q2/May 2024 subject matter hearing held by the Committee on Transportation and Public Way on May 30th, 2024.
- Documents issued by the CTA Control Center called "CTA Control Center Alert" from 1/1/24 to 5 days before this request is filled. An example of matching records would be similar to those provided in response to CTA FOIA 0163. In the event of records that appear to be duplicated, please exclude the email version only if the original format is located. If multiple records are found for the same incident ID, only provide the final communication of each incident ID.

Thank you,

Nik

NIK HUNDER LEED GREEN ASSOC

Policy Analyst/Researcher

Fabrication Engineer

(440) 600-4413

he/him

Exhibit 7



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

July 5, 2024

Via Electronic Mail

Nik Hunder nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0687

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a non-commercial FOIA request for the following records:

For records created for FY 2018 through FY2023:

- CTA Safety Plan as required by 49 CFR Part 673
- Audit reports created by CTA employees or externally contracted firms that
 may have assisted in meeting federal compliance standards in the below
 categories. Records being searched for do not need to explicitly cite the federal
 regulation they are meeting by the production of that audit. The information
 provided in parentheses is not a requirement for a match or a limiting factor in
 the search. It is provided for clarification and assistance when determining
 where such records would be located. Both failed and passed audits should be
 included.
- Financial (such as A-133 as required under 2 CFR Part 200, and annual financial audits like the one referenced in the June 26th, 2024 Transit Board meeting)
- Rail Safety (such as State Safety Oversight for compliance with 49 CFR Part 674)
- Labor/OSHA (for checking compliance with federal regulations 29 CFR Part 1910, 29 U.S.C. § 201, 29 U.S.C. § 651, 29 U.S.C. § 2601, 29 U.S.C. § 151, 42 U.S.C. § 12101 or state regulations 820 ILCS 105, 820 ILCS 219, 820 ILCS 305, 775 ILCS 5)
- Vehicle and Facility Maintenance Audits (such as those created for grant compliance and as required by FTA maintenance guidelines)
- Environmental (such as those required by the National Environmental Protection Act [NEPA] for major construction processes and federal regulations 42 U.S.C. § 7401, 33 U.S.C. § 1251, 42 U.S.C. § 6901, 42 U.S.C. § 9601, and 42 U.S.C. § 4321. State compliance would be 415 ILCS 5, 415 ILCS 5/9, 430 ILCS 30, and 415 ILCS 55).
- Energy (fuel mix, vehicle efficiency)

- Exclude building efficiency audits (except for maintenance facilities as required by the FTA)
- o Grant Management Audits (also required by 2 CFR Part 200)
- Annual financial statements
- Records outlining actionable steps created as a result of any of the audits
 discovered from the listed above. Records that demonstrate actional steps but
 were not derived from the audits listed above do not need to be provided.
- Internal policies for handling complaints and safety issues from workers.

CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your several (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

David B. Montgomery Associate Attorney Compliance, Policy and Risk

Exhibit 8



Aug 2, 2024

567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

Via Electronic Mail

Nik Hunder Leed Green Assoc. Policy Analyst/Researcher Fabrication Engineer nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0784

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a non-commercial FOIA request. Please search for the following records broken down into headcount by position, terminations initiated by CTA by position, transfers to other departments (specify what department they were transferred to) by position, and resignations by position for each month in the below date ranges.

The specific positions and date ranges are as follows:

- Rapid Transit Operator Headcount from 1/1/19 to 7/31/24
- Combined Service Operator from 1/1/19 to 7/31/24
- Flagger from 1/1/19 to 10/31/21 and 1/1/24 to 7/31/24
- Switch Worker from 1/1/19 to 7/31/24
- Tower Workers from 1/1/19 to 7/31/24
- Extra Board from 1/1/19 to 7/31/24
- Yardmaster from 1/1/19 to 7/31/24
- Bus Operator from 1/1/19 to 7/31/24

Additionally, search for a copy of the 2024 Q2 Customer Satisfaction Survey and any presentations developed from its results.

CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your several (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to

be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Brigett R. Bevan Managing Attorney Compliance, Policy and Risk

Exhibit 9



August 26, 2024

567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

Via Electronic Mail

Nik Hunder Leed Green Assoc. Policy Analyst/Researcher Fabrication Engineer nikhunder@gmail.com

Re: Freedom of Information Act Request - FOIA 2024-0784

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a non-commercial FOIA request. Please search for the following records broken down into headcount by position, terminations initiated by CTA by position, transfers to other departments (specify what department they were transferred to) by position, and resignations by position for each month in the below date ranges.

The specific positions and date ranges are as follows:

- Rapid Transit Operator Headcount from 1/1/19 to 7/31/24
- Combined Service Operator from 1/1/19 to 7/31/24
- Flagger from 1/1/19 to 10/31/21 and 1/1/24 to 7/31/24
- Switch Worker from 1/1/19 to 7/31/24
- Tower Workers from 1/1/19 to 7/31/24
- Extra Board from 1/1/19 to 7/31/24
- Yardmaster from 1/1/19 to 7/31/24
- Bus Operator from 1/1/19 to 7/31/24

Additionally, search for a copy of the 2024 Q2 Customer Satisfaction Survey and any presentations developed from its results.

As indicated in CTA's correspondence of August 2, 2024, CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your seven (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time by notifying you that your request as currently stated is unduly burdensome to process. 5

ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to confer in an attempt to reduce your request to more manageable proportions.

Please contact me if you have any questions or with to confer regarding the scope of your FOIA request to CTA.

Sincerely,

Brigett R. Bevan Managing Attorney Compliance, Policy and Risk

From: "Nik Hunder" < nikhunder@gmail.com>
To: FOIA < FOIA@transitchicago.com>

Date: 9/12/2024 11:45:47 AM

Subject: Re: Hunder CTA FOIA Operations Staff Headcounts

Hey Brigett,

Were you able to determine if this was now reasonable to process?

-Nik

NIK HUNDER LEED GREEN ASSOC. Policy Analyst/Researcher Fabrication Engineer (440) 600-4413

he/him

On Fri, Aug 30, 2024 at 4:56 PM FOIA < FOIA@transitchicago.com > wrote:

Dear Mr. Hunder,

Since my last email regarding this request, I have worked with staff, and the modification that you suggested made a big difference. I should know more next week, but I am working with your request, as modified, to see if it can be fulfilled without any additional modifications. I will update you as soon as possible next week on this one.

Regards,

Brigett R. Bevan

Managing Attorney
Compliance, Policy, & Risk
Chicago Transit Authority Law Department
567 W. Lake St.
Chicago, IL 60661
T: 312-681-2809 | E: FOIA@transitchicago.com

From: FOIA <<u>FOIA@transitchicago.com</u> > Sent: Thursday, August 29, 2024 5:55 PM
To: Nik Hunder <<u>nikhunder@gmail.com</u> >

Subject: Re: Hunder CTA FOIA Operations Staff Headcounts

Dear Mr. Hunder,

Thank you for your email. I am working with staff to see if we can fully process your request with the modification that you suggested. I should know more in the next business day or so.

Regards,

Brigett R. Bevan

Managing Attorney
Compliance, Policy, & Risk
Chicago Transit Authority Law Department
567 W. Lake St.
Chicago, IL 60661

T: 312-681-2809 | E: FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com >

Sent: Tuesday, August 27, 2024 12:09 PM **To:** FOIA < FOIA@transitchicago.com >

Subject: Re: Hunder CTA FOIA Operations Staff Headcounts

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hey Brigett,

We can remove the ask for "(specify what department they were transferred to)" from the request. Otherwise, I don't see how the rest of the request could continue to be burdensome. These are just HR headcount and termination numbers and I've already slimmed down the request when I removed the date ranges where I already had data

The revised request would only ask for terminations, new hires, transfers, and resignations (by month) for only eight of the many CTA positions along with the Q2 Customer Survey.

I've attached two years' worth of data that David was able to retrieve for me from 2023-1139 as an example of how previous data was organized/provided to me. I don't expect these relevant records to be compiled as nicely as he did voluntarily, but the first seven lines are close to what I'm looking for. The breakdown in the following lines isn't necessary.

Best, Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him

On Mon, Aug 26, 2024 at 7:26 PM FOIA < FOIA@transitchicago.com > wrote:

Dear Mr. Hunder,

Please find attached correspondence regarding your FOIA request to the CTA.

Regards,

Brigett R. Bevan

Managing Attorney
Compliance, Policy, & Risk
Chicago Transit Authority Law Department
567 W. Lake St.
Chicago, IL 60661
T: 312-681-2809 | E: FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com >
Sent: Friday, July 26, 2024 2:11 PM
To: FOIA < FOIA@transitchicago.com >

Subject: Hunder CTA FOIA Operations Staff Headcounts

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hello,

I would like to make a non-commercial FOIA request. Please search for the following records broken down into headcount by position, terminations initiated by CTA by position, transfers to other departments (specify what department they were transferred to) by position, and resignations by position for each month in the below date ranges.

The specific positions and date ranges are as follows:

- Rapid Transit Operator Headcount from 1/1/19 to 7/31/24
- Combined Service Operator from 1/1/19 to 7/31/24
- Flagger from 1/1/19 to 10/31/21 and 1/1/24 to 7/31/24
- Switch Worker from 1/1/19 to 7/31/24
- Tower Workers from 1/1/19 to 7/31/24
- Extra Board from from 1/1/19 to 7/31/24
- Yardmaster from 1/1/19 to 7/31/24
- Bus Operator from 1/1/19 to 7/31/24

Additionally, search for a copy of the 2024 Q2 Customer Satisfaction Survey and any presentations developed from its results.

Best, Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

Aug 7, 2024

Via Electronic Mail

Nik Hunder Leed Green Assoc. Policy Analyst/Researcher Fabrication Engineer nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0795

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a non-commercial FOIA request for the following records between 10/1/14 and 7/1/24

- Records showing local, state, and federal grants CTA submitted applications for that indicate the agency/funder, grant title, program title (if applicable), Catalog of Federal Domestic Assistance (CFDA) number or Funding Opportunity Number (FON), status (such as submitted, under review, awarded, complete, reporting period, and others as used by CTA), and award amount.
- For each funded or denied grant application, provide the denial or award/funding notice letter issued by the awarding agency/funder.

CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your several (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA must respond to this request within 21 business days after receipt. 5 ILCS 140/2(g) and 3.2. The response shall (i) provide you with an estimate of the time required by CTA to provide the records requested and an estimate of the fees to be charged, which CTA may require you to pay in full before copying the requested documents, (ii) deny the request pursuant to one or more of the exemptions available under FOIA, (iii) notify you that the request is unduly burdensome and extend an opportunity to you to attempt to reduce the request to manageable proportions, or (iv) provide the records requested. Unless the records are exempt from disclosure, CTA shall comply with your request within a reasonable period considering the size and complexity of the request as required by Section 3.2(c) of FOIA. 5 ILCS 140/3.2.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Brigett R. Bevan Managing Attorney Compliance, Policy and Risk



567 West Lake Street Chicago, Illinois 60661 TEL 312-681-2809

www.transitchicago.com

Aug 29, 2024

Via Electronic Mail

Nik Hunder Leed Green Assoc. Policy Analyst/Researcher Fabrication Engineer nikhunder@gmail.com

Re: Freedom of Information Act Request – FOIA 2024-0795

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act ("FOIA") request to the Chicago Transit Authority ("CTA") that seeks the following:

I would like to make a non-commercial FOIA request for the following records between 10/1/14 and 7/1/24

- Records showing local, state, and federal grants CTA submitted applications for that indicate the agency/funder, grant title, program title (if applicable), Catalog of Federal Domestic Assistance (CFDA) number or Funding Opportunity Number (FON), status (such as submitted, under review, awarded, complete, reporting period, and others as used by CTA), and award amount.
- For each funded or denied grant application, provide the denial or award/funding notice letter issued by the awarding agency/funder.

As indicated in CTA's correspondence of August 7, 2024, CTA is treating your request pursuant to 5 ILCS 140/3.2 and 2(g) based upon your seven (7) FOIA requests received on January 8, January 9, January 10, and January 11, 2024, respectively. *See* FOIA Request for Review 2024 PAC 79991 (June 20, 2024)(The Public Access Counselor rejected a challenge to your recurrent requester designation as unfounded).

In accordance with Sections 2(g) and 3.2 of FOIA, CTA is responding to your request at this time by notifying you that your request as currently stated is unduly burdensome to process. 5 ILCS 140/3.2 and 2(g). CTA is extending an opportunity to you to confer in an attempt to reduce your request to more manageable proportions.

Please contact me if you have any questions or with to confer regarding the scope of your FOIA request to CTA.

Sincerely,

Brigett R. Bevan Managing Attorney Compliance, Policy and Risk

From: "Nik Hunder" < nikhunder@gmail.com>
To: FOIA < FOIA@transitchicago.com>

Date: 9/12/2024 11:46:39 AM

Subject: Re: Hunder CTA FOIA - Grants

Hey Brigett,

Were you able to determine if this scope is now reasonable?

-Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him

On Fri, Aug 30, 2024 at 4:55 PM FOIA < FOIA@transitchicago.com > wrote:

Dear Mr. Hunder,

Thank you for your willingness to confer regarding the scope of your request. Yes, I understood that your request was for data and then denial and intent to fund letter.

Yes, the timeframe was an issue, so I am working here to determine if that change alone will make your request manageable to process.

I will let you know as soon as possible.

Regards,

Brigett R. Bevan

Managing Attorney Compliance, Policy, & Risk Chicago Transit Authority Law Department 567 W. Lake St. Chicago, IL 60661

T: 312-681-2809 | E: FOIA@transitchicago.com

From: Nik Hunder <nikhunder@gmail.com >
Sent: Thursday, August 29, 2024 6:07 PM
To: FOIA <FOIA@transitchicago.com >
Subject: Re: Hunder CTA FOIA - Grants

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hey Brigett,

Are these lengthy documents that are time-consuming to comb through? I want to clarify I don't want the actual application submitted. More of a list of grants that CTA applied for that include the requested details plus denial or intent to fund letters.

I'm willing to reduce this timeframe from 1/1/18 to 7/1/24.

-Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him

On Thu, Aug 29, 2024 at 6:03 PM FOIA < FOIA @transitchicago.com > wrote:

Dear Mr. Hunder,

Please find attached correspondence regarding your FOIA request to the CTA.

Regards,

Brigett R. Bevan

Managing Attorney
Compliance, Policy, & Risk
Chicago Transit Authority Law Department
567 W. Lake St.
Chicago, IL 60661
T: 312-681-2809 | E: FOIA@transitchicago.com

From: Nik Hunder < nikhunder@gmail.com >
Sent: Tuesday, July 30, 2024 7:20 PM
To: FOIA < FOIA@transitchicago.com >

Subject: Hunder CTA FOIA - Grants

EXTERNAL EMAIL This email originated outside of CTA. **NEVER CLICK or OPEN** unexpected links or attachments. **NEVER** provide User ID or Password. CTA IT Support will NEVER ask you for such information. If this email seems suspicious, contact CTA Help Desk at x12345.

Hello,

I would like to make a non-commercial FOIA request for the following records between 10/1/14 and 7/1/24

- Records showing local, state, and federal grants CTA submitted applications for that indicate the agency/funder, grant title, program title (if applicable), Catalog of Federal Domestic Assistance (CFDA) number or Funding Opportunity Number (FON), status (such as submitted, under review, awarded, complete, reporting period, and others as used by CTA), and award amount.
- For each funded or denied grant application, provide the denial or award/funding notice letter issued by the awarding agency/funder.

Best, Nik

NIK HUNDER LEED GREEN ASSOC.
Policy Analyst/Researcher
Fabrication Engineer
(440) 600-4413
he/him