

Exhibit 2

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

IRENE SIMMONS, and RODELL
SANDERS, for themselves and others
similarly situated,

Plaintiffs,

v.

MOTOROLA SOLUTIONS, INC., and
VIGILANT SOLUTIONS, LLC,

Defendants.

Case No. 2024L010142

Hon. Joel Chupack

**DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION
AND ADEQUACY OF NOTICE PLAN**

I, Cameron R. Azari, Esq., hereby declare that I am fully competent to make this Declaration, that I have personal knowledge of all matters set forth herein unless otherwise indicated, and that I would testify to all such matters if called as a witness in this matter.¹

1. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.

2. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. References to Epiq in this declaration include Epiq Legal Noticing and Hilsoft Notifications.

3. The facts in this Declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq.

OVERVIEW

4. This declaration describes the successful implementation of the settlement notice plan (“Notice Plan”) and notices (the “Notice” or “Notices”) for *Simmons v. Motorola Solutions*,

¹ 735 ILCS 5/1-109.

Inc., Case No. 2024-L-010142, pending in the Circuit Court of Cook County, Illinois, Chancery Division. I previously executed my *Declaration of Cameron R. Azari, Esq. Regarding Notice Plan* (“Notice Plan Declaration”) on March 13, 2025, which described the Notice Plan, detailed Epiq’s class action notice experience, and attached Epiq’s curriculum vitae. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice programs.

NOTICE PLANNING METHODOLOGY

5. Illinois Code of Civil Procedure Sec. 2-803 states, “Upon a determination that an action may be maintained as a class action, or at any time during the conduct of the action, the court in its discretion may order such notice that it deems necessary to protect the interests of the class and the parties.”² The Notice Plan as implemented satisfied these requirements.

6. This Notice Plan was designed to reach the greatest number practicable of Settlement Class Members. With the address updating protocols that were used, the Notice Plan reached approximately 71% of the identified Settlement Class Members with individual notice via mail combined with publication notice, digital notice, and social media. The reach was further enhanced by internet sponsored search listings, an informational release, and a Settlement Website. “Reach” refers to the estimated percentage of the unduplicated audience exposed to the notice. In my experience, the Notice Plan was consistent with other court-approved notice plans for class action settlements, was the best method practicable under the circumstances of this case, and satisfied the requirements of due process, including its “desire to actually inform” requirement.³

² 735 ILCS 5/2-803.

³ *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”).

NOTICE PLAN DETAIL

7. On April 9, 2025, the Court approved the Notice Plan and appointed Epiq as the Settlement Administrator in the *Preliminary Approval Order*. In the Preliminary Approval Order, the Court certified, for settlement purposes only, the following “Settlement Class”:

All persons whose faces appeared in images that were processed using the FaceSearch technology, including but not limited to images that are or were included in the booking photo databases that Motorola Solutions and/or Vigilant created and made available for law enforcement customer searches, images uploaded by law enforcement customers, and images used to train or test the FaceSearch technology, at any time up through the entry of the Preliminary Approval Order who either: (a) are or were Illinois residents; or (b) were present in Illinois at the time the images were taken or processed.

8. After the Court’s Preliminary Approval Order was entered, Epiq implemented the Notice Plan. This Declaration details the notice activities undertaken to date and explains how and why the Notice Plan was comprehensive and well-suited to reach the Settlement Class Members. This Declaration also discusses the administration activity to date.

NOTICE PLAN

Individual Notice

9. Epiq received multiple data files for identified Settlement Class Members, which included names, mailing addresses, and dates of birth where available (an initial data file and subsequent data files). Epiq deduplicated the initial data file, rolled-up the records, and loaded the unique, identified Settlement Class Member records into its database. Prior to sending Notice, identified Settlement Class Member records which did not include a mailing address were sent to a third-party to perform “reverse lookups” to determine if an associated mailing address was available. These efforts resulted in 134,472 records which were returned with a mailing address. Initial records with an available mailing address were combined with these 134,472 records, resulting in 154,094 unique, identified Settlement Class Member records available to send a Postcard Notice via United States Postal Service (“USPS”) first class mail.

Individual Notice – Direct Mail

10. On May 27, 2025, Epiq commenced sending 129,652 Postcard Notices to identified Settlement Class Members with an associated mailing address included in the initial data file. Subsequently, on June 25, 2025, Epiq sent an additional 24,442 Postcard Notices to identified Settlement Class Members with an associated mailing address included in the supplemental data files. The Postcard Notices were sent via United States Postal Service (“USPS”) first class mail. The Postcard Notice clearly and concisely summarized the Settlement and the legal rights of the Settlement Class Members. In addition, the Postcard Notice also directed the recipients to the Settlement Website where they could access the Long Form Notice and additional information about the case. The Postcard Notice is included as **Attachment 1**.

11. Prior to sending the Postcard Notice, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the USPS to ensure Settlement Class Member address information was up-to-date and accurately formatted for mailing.⁴ In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and was verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

12. The return address on the Postcard Notices is a post office box that Epiq maintains for this case. The USPS automatically forwards Postcard Notices with an available forwarding address order that has not expired (“Postal Forwards”). Postcard Notices returned as undeliverable were re-mailed to any new address available through USPS information, (for example, to the address provided by the USPS on returned mail pieces for which the automatic forwarding order

⁴ The NCOA database is maintained by the USPS and consists of approximately 160 million permanent change-of-address (COA) records consisting of names and addresses of individuals, families, and businesses who have filed a change-of-address with the Postal Service™. The address information is maintained on the database for 48 months and reduces undeliverable mail by providing the most current address information, including standardized and delivery-point-coded addresses, for matches made to the NCOA file for individual, family, and business moves.

has expired, but was still within the time period in which the USPS returned the piece with the address indicated), or to better addresses that were found using a third-party lookup service. Upon successfully locating better addresses, Postcard Notices were promptly remailed. As of August 11, 2025, Epiq has remailed 4,425 Postcard Notices. As of August 11, 2025, the Postcard Notices, (including remails) were delivered to 116,824 of the 154,094 unique, identified Settlement Class Member records available to send a Postcard Notice.

13. Additionally, a Claim Form and Long Form Notice (“Claim Package”) was available on request via the toll-free telephone number or other means. As of August 11, 2025, Epiq has mailed 246 Claim Packages as a result of such requests. The Claim Form is included as **Attachment 2**. The Long Form Notice is included as **Attachment 3**.

Media Plan

Internet Digital Notice Campaign

14. Internet advertising has become a standard component in legal notice programs. The internet has proven to be an efficient and cost-effective method to target class members as part of providing notice of a class action lawsuit. According to MRI-Simmons⁵ data, 97% of all adults are online and 84% of all adults use social media.⁶

15. The Notice Plan included targeted digital advertising (“Digital Notices”) on the selected advertising networks *Google Display Network* and *Yahoo Audience Network*, which together represent thousands of digital properties across all major content categories. All Digital Notices were targeted to selected audiences and were designed to encourage participation by

⁵ MRI-Simmons is a leading source of publication readership and product usage data for the communications industry. MRI-Simmons is a joint venture of GfK Mediamark Research & Intelligence, LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers comprehensive demographic, lifestyle, product usage and exposure to all forms of advertising media collected from a single sample. As the leading U.S. supplier of multimedia audience research, the company provides information to magazines, televisions, radio, internet, and other media, leading national advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United States. MRI-Simmons’s national syndicated data is widely used by companies as the basis for the majority of the media and marketing plans that are written for advertised brands in the United States.

⁶ MRI-Simmons 2024 Survey of the American Consumer®.

Settlement Class Members—by linking directly to the Settlement Website, allowing visitors easy access to relevant information and documents. Consistent with best practices, the Digital Notices used language from the headline of the Long Form Notice, which allowed users to identify themselves as potential Settlement Class Members.

16. The Digital Notices were also placed on the leading social media platforms in the United States, *Facebook*, *Instagram*, and *LinkedIn*. *Facebook* is the leading social networking site in the United States with 196 million users, *Instagram* has 171 million active users in the United States, and *LinkedIn* has an audience of 250 million users in the United States.⁷

17. The Digital Notices were distributed to a variety of target audiences, including those relevant to individuals' demonstrated interests and/or likes. All Digital Notices appeared on desktop, mobile, and tablet devices. Digital Notices on *Google Display Network*, *Yahoo Audience Network*, *Facebook*, *Instagram*, and *LinkedIn* were displayed in Illinois and the surrounding states⁸ to reach Settlement Class Members. Digital Notices were also targeted (remarketed) to people who clicked on a Digital Notice.

18. More details regarding the target audiences, distribution and specific ad sizes of the Digital Notices, and the number of delivered impressions are included in the following table:

<i>Digital Plan</i>	<i>Target</i>	<i>Ad Sizes</i>	<i>Delivered Impressions</i>
<i>Google Display Network</i>	Adults 18+ in Illinois	728x90, 300x250, 300x600 & 970x250	11,866,709
<i>Google Display Network</i>	Adults 18+ in WI, IA, MO, KY, OH, IN, MI	728x90, 300x250, 300x600 & 970x250	13,659,674
<i>Yahoo Audience Network</i>	Adults 18+ in Illinois	728x90, 300x250, 300x600 & 970x250	3,146,624
<i>Yahoo Audience Network</i>	Adults 18+ in WI, IA, MO, KY, OH, IN, MI	728x90, 300x250, 300x600 & 970x250	3,327,827
<i>LinkedIn</i>	Adults 18+ in Illinois	Feed Ads	1,062,031

⁷ Statista Digital 2024: Global Overview Report. Statista, founded in 2007, is a leading provider of worldwide market and consumer data and is trusted by thousands of companies around the world for data. Statista.com consolidates statistical data on over 80,000 topics from more than 22,500 sources and makes it available in German, English, French and Spanish.

⁸ Surrounding states include WI, IA, MO, KY, OH, IN, and MI.

<i>Digital Plan</i>	<i>Target</i>	<i>Ad Sizes</i>	<i>Delivered Impressions</i>
<i>LinkedIn</i>	Adults 18+ in WI, IA, MO, KY, OH, IN, MI	Feed Ads	2,078,952
<i>Facebook</i>	Adults 18+ in Illinois	Newsfeed & Right Hand Column	5,935,928
<i>Facebook</i>	Adults 18+ in WI, IA, MO, KY, OH, IN, MI	Newsfeed & Right Hand Column	6,305,623
<i>Instagram</i>	Adults 18+ in Illinois	Newsfeed	3,545,720
<i>Instagram</i>	Adults 18+ in WI, IA, MO, KY, OH, IN, MI	Newsfeed	3,851,985
TOTAL			54,781,073

19. Combined, more than 54.7 million targeted impressions were generated by the Digital Notices, which ran from May 27, 2025, through July 7, 2025. Clicking on the Digital Notices linked the reader to the Settlement Website, where they could easily obtain detailed information about the Settlement.⁹ Examples of the Digital Notices are included as **Attachment 4**.

Publication Notice

20. On June 3, 2025, the Publication Notice appeared in 8 targeted Illinois publications. The Publication Notice appeared one time each for a total of 8 insertions. A complete list of publications in which the Publication Notice appeared along with the ad size and date published for each is included below.

<i>Publication</i>	<i>Circulation</i>	<i>Date Published</i>	<i>Ad Size</i>
<i>Chicago Tribune</i>	206,339	6/3/2025	4.915" x 5.25"
<i>Chicago Sun-Times</i>	41,863	6/3/2025	4.93" x 4.88"
<i>Evansville Courier & Press</i>	8,104	6/3/2025	4.91" x 4.92"
<i>The Journal Star (Peoria)</i>	7,453	6/3/2025	3.22" x 10"

⁹ The third-party ad management platform, ClickCease was used to audit the Digital Notice ad placements. This type of platform tracks all Digital Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent, or otherwise invalid traffic (e.g., ads being seen by 'bots' or non-humans, ads not being viewable, etc.).

<i>Publication</i>	<i>Circulation</i>	<i>Date Published</i>	<i>Ad Size</i>
<i>State Journal Register (Springfield)</i>	14,362	6/3/2025	3.22" x 10"
<i>Southern Illinoisan (Carbondale)</i>	3,500	6/10/2025 ¹⁰	4.75" x 5"
<i>St. Louis Post Dispatch</i>	24,263	6/3/2025	4.889" x 4.9"
<i>Dispatch/Rock Island Argus (Moline)</i>	13,039	6/3/2025	4.88" x 5.1"
TOTAL	318,923		

21. The selected publications have a combined circulation of over 318,000. An example of the Publication Notice as it appeared in these publications is included as **Attachment 5**. Individual tear sheets for each publication insertion have been collected by Epiq and are available upon request.

Sponsored Search Listings

22. Sponsored search listings were acquired on the three most highly visited internet search engines: *Google*, *Yahoo!*, and *Bing*. When search engine visitors searched on selected common keyword combinations related to the Settlement, the sponsored search listing created for this Settlement was generally displayed at the top of the visitor's website page prior to the search results or in the upper right-hand column of the web-browser screen. All sponsored search listings linked directly to the Settlement Website. The sponsored search listings were displayed in Illinois and the surrounding states (WI, IA, MO, KY, OH, IN, and MI).

23. The sponsored search listings began on May 27, 2025, and ran through July 7, 2025. The sponsored listings were displayed 47,171 times, which resulted in 2,229 clicks that displayed the Settlement Website. A complete list of the sponsored search keyword combinations is included as **Attachment 6**. Examples of the sponsored search listing as displayed on each search engine are included as **Attachment 7**.

¹⁰ The Publication Notice was published again in the *Southern Illinoisan* on 6/10/2025 due to a printing error by the publisher that altered the readability of the ad in the 6/3/2025 issue.

Informational Release

24. To build additional reach and extend exposures, on May 27, 2025, a party-neutral Informational Release was issued statewide over *PR Newswire's Illinois newswire* to over 140 general media (print and broadcast) outlets, including local and national newspapers, magazines, national wire services, television and radio broadcast media, websites, online databases, internet networks, and social networking media across Illinois.

25. The Informational Release included the address of the Settlement Website and the toll-free telephone number. The Informational Release served a valuable role by providing additional notice exposures beyond that which was provided by the paid media. The Informational Release is included as **Attachment 8**.

Settlement Website

26. On May 23, 2025, Epiq established a Settlement Website for the Settlement with an easy to remember domain name (www.SimmonsBIPASettlement.com). Relevant documents are posted on the Settlement Website, including the Long Form Notice, Postcard Notice, Settlement Agreement, Claim Form, Preliminary Approval Order, and Plaintiffs' Motion for Attorneys' Fees and Incentive Awards. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions ("FAQs"), instructions for how the Settlement Class Members could opt-out (request exclusion) from or object to the Settlement prior to the deadlines, contact information for the Settlement Administrator, and how to obtain other case-related information. The Settlement Class Members were also able to file a Claim Form on the Settlement Website prior to the deadline. The Settlement Website address was prominently displayed in all notice documents. As of August 11, 2025, there have been 311,039 unique visitor sessions to the Settlement Website, and 1,156,659 web pages have been presented.

Toll-Free Telephone Number

27. On May 23, 2025, a toll-free telephone number was established (1-855-688-8844) for the Settlement. Callers are able to hear an introductory message, have the option to learn more about the Settlement in the form of recorded answers to FAQs, and were able to request that a

DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION AND
ADEQUACY OF NOTICE PLAN

Claim Package be mailed to them. The automated telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was prominently displayed in all notice documents. As of August 11, 2025, the toll-free telephone number has handled 1,659 calls to the toll-free telephone number representing 3,951 minutes of use.

28. A postal mailing address was established and continues to be available to allow Settlement Class Members the opportunity to request additional information or ask questions.

Requests for Exclusion and Objections

29. The deadline to request exclusion from the Settlement or to object to the Settlement was July 8, 2025. As of August 11, 2025, Epiq has received no requests for exclusion. Epiq received one objection to the Settlement submitted on August 4, 2025, after the objection deadline had passed. The objection was apparently neither filed with the Court nor sent to Class Counsel and Defendants' counsel as required. The objection is unrelated to notice or settlement administration. The redacted Objection received by Epiq is attached as **Attachment 9**.

Claim Submission & Distribution Options

30. The Settlement provided Settlement Class Members the option of filing a Claim Form. The Notices contained a detailed summary of the relevant information about the Settlement, including the Settlement Website address and how Settlement Class Members could file a Claim Form online or by mail. With any method of filing a Claim Form, Settlement Class Members were given the option of receiving a digital payment or a traditional paper check.

31. The deadline for Settlement Class Members to submit a Claim Form was July 29, 2025. As of August 11, 2025, Epiq has received 272,453 Claim Forms (262,688 online and 9,765 paper). Since the July 29, 2025, deadline has just recently passed, these numbers are preliminary and are subject to change. As standard practice, Epiq is in the process of conducting a complete quality control review of Claim Forms received. As of August 11, 2025, Epiq was able to associate 35,975 Claim Forms with a Settlement Class Member record. It appears some Settlement Class Members filed multiple Claim Forms using a different date and/or email address. Epiq is in the process of reviewing these Claim Forms.

32. In addition, Epiq is in the process of conducting a detailed analysis of all Claim Forms received by looking at numerous known indicators of indicia of fraud. Fraudulent claim filing is an unfortunate reality in many class action settlements. Given the current trends within the Class Action Industry with fraudulent claim filing by bad actors, some level of fraudulent claim filing is suspected for the Claim Forms filed in this Settlement. Based on Epiq's initial analysis of the online Claim Forms some level of indicia of fraud are present and will likely result in a substantial percentage of Claim Forms being rejected.

CONCLUSION

33. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by state and local rules and statutes, and by case law pertaining to notice. This framework directs that the notice plan be designed to reach the greatest practicable number of potential class members and, in a settlement class action notice situation such as this, that the notice or notice plan not limit knowledge of the availability of benefits—nor the ability to exercise other options—to class members in any way. All of these requirements were met in this case.

34. The Notice Plan included sending individual notice to identified Settlement Class Members and a media plan (Publication Notice in select Illinois newspapers, digital notice and social media). With the address updating protocols that were used, the Notice Plan reached approximately 71% of the identified Settlement Class Members with individual notice via mail combined with publication notice, digital notice, and social media. The reach was further enhanced by internet sponsored search listings, an informational release, and a Settlement Website. The Federal Judicial Center's ("FJC") *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*, which is relied upon for federal cases and is illustrative for state courts, states that, "the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable

to reach between 70–95%.”¹¹ Here, we have implemented a Notice Plan that readily achieved a reach within that standard.

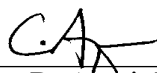
35. The Notice Plan followed the guidance for satisfying due process obligations that a notice expert gleans from the United States Supreme Court’s seminal decisions, which emphasize the need: (a) to endeavor to actually inform the Settlement Class, and (b) to ensure that notice is reasonably calculated to do so.

- a) “[W]hen notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950); and
- b) “[N]otice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) (citing *Mullane*, 339 U.S. at 314).

36. The Notice Plan provided notice that conformed to all aspects of Illinois Code of Civil Procedure Sec. 2-803 regarding notice, comported with the guidance for effective notice articulated in the Manual for Complex Litigation, Fourth and applicable FJC materials, and satisfied the requirements of due process, including its “desire to actually inform” requirement.

37. The Notice Plan schedule afforded sufficient time to provide full and proper notice to the Settlement Class Members before the Objection/Exclusion Deadline.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 12, 2025.



 Cameron R. Azari, Esq.

¹¹ FED. JUDICIAL CTR, JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.

Attachment 1

Simmons BIPA Settlement
Class Action Administrator
PO Box 2920
Portland, OR 97208-2920

PRESORTED
FIRST-CLASS MAIL
AUTO
US POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2882

COURT AUTHORIZED NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT IF YOUR FACE APPEARED IN IMAGES THAT WERE PROCESSED USING FACESEARCH TECHNOLOGY AND YOU: (A) ARE OR WERE AN ILLINOIS RESIDENT; OR (B) WERE PRESENT IN ILLINOIS AT THE TIME THE IMAGE(S) WAS TAKEN OR PROCESSED



By Order of the Court Dated: April 9, 2025

Claim ID: [Redacted]

FILED DATE: 8/12/2025 9:28 PM 2024L010142



Claim ID: [Redacted]

CLAIM FORM

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY JULY 29, 2025 AND MUST BE FULLY COMPLETED, BE SIGNED, AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

First Name: [Grid] MI: [Grid] Last Name: [Grid]

Mailing Address: [Grid]

City: [Grid] State: [Grid] ZIP Code: [Grid]

Email Address: [Grid]

Please select from the options below how you would like to receive your Settlement Payment:

Digital Payment* Paper Check

*You must provide a valid email address to receive a digital payment.

Class Member Verification: By submitting this Claim Form, I declare that I am a member of the Settlement Class and that the following information is true and correct: I am an individual whose face appeared in images that were processed using FaceSearch technology at any point in time through April 9, 2025. I am an Illinois resident (or was an Illinois resident), or at least was present in Illinois at the time the images were taken or processed.

Signature: [Grid] Date (MM/DD/YY): [Grid]

The Settlement Administrator will review your Claim Form, and if accepted, you will be mailed a check for a *pro rata* share depending on the number of valid claim forms received. This process takes time, so please be patient.

Questions? Visit www.simmonsBIPAsettlement.com or call 1-855-688-8844.

This notice is to inform you that a proposed settlement has been reached in a class action lawsuit against Motorola Solutions, Inc. ("Motorola Solutions") and Vigilant Solutions LLC ("Vigilant"; together with Motorola Solutions, "Defendants"), which provided law enforcement customers with facial recognition technology known as FaceSearch and with access to a gallery of booking photos. The lawsuit alleges that Defendants violated an Illinois law called the Illinois Biometric Information Privacy Act ("BIPA") by allegedly collecting, storing, using, and disclosing individuals' biometric data in connection with providing FaceSearch and access to the booking photo gallery, allegedly without complying with the law's requirements. The case is *Simmons v. Motorola Solutions, Inc.*, Case No. 2024-L-010142, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division. The proposed Settlement is not an admission of wrongdoing by Defendants and Defendants deny that they violated the law. The Court has not decided who is right or wrong.

Why Am I Being Contacted? Our records indicate that your face appears in one or more booking photo images that were processed using Defendants' FaceSearch technology. You therefore may be eligible to receive cash benefits from this Settlement.

What Does The Settlement Provide? If you're eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The amount of the payment is estimated to be approximately \$200 to \$550 for those who file a valid claim, but could be more or less depending on the number of valid claims submitted. The amount would be an equal share of a \$47,500,000 fund that Defendants have agreed to create, after any Court-approved payment of settlement expenses, attorneys' fees, and incentive awards.

How Do I Get My Payment? Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, www.simmonsBIPAsettlement.com, and submit a Claim Form online. You can also call 1-855-688-8844 to request a paper copy of the Claim Form. **All Claim Forms must be postmarked or submitted online by July 29, 2025.**

What Are My Options? You can do nothing, comment on or object to any of the settlement terms, or exclude yourself from the settlement. If you do nothing, you won't be able to sue Defendants or certain related companies and individuals in a future lawsuit about the claims addressed in the settlement. If you exclude yourself, you won't get a payment but you'll keep your right to sue Defendants on the issues the settlement concerns. You must contact the settlement administrator by mail or e-mail to exclude yourself. You can also object to the settlement if you disagree with any of its terms. **All Requests for Exclusion and Objections must be received by July 8, 2025.**

Do I Have A Lawyer? Yes. The Court has appointed lawyers from the law firm Loevy & Loevy as "Class Counsel." They represent you and other settlement class members. The lawyers will request to be paid from the total amount that Defendants paid into the fund. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees. The Court has also chosen Irene Simmons and Rodell Sanders—class members like you—to represent the Settlement Class.

When Will The Court Approve The Settlement? The Court will hold a final approval hearing on August 20, 2025 at 9:30 am before the Honorable Joel Chupack in Room 2601, Richard J. Daley Center, 50 W. Washington St., Chicago, IL 60602. The Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to 34% of the fund and incentive awards of \$7,500, which will be available on the Settlement Website.

AL3052 v.03



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 581 PORTLAND, OR

POSTAGE WILL BE PAID BY ADDRESSEE

**SIMMONS V MOTOROLA SOLUTIONS
SETTLEMENT ADMINISTRATOR
C/O EPIQ
PO BOX 2920
PORTLAND OR 97208-9660**



FILED DATE: 8/12/2025 9:28 PM 2024L010142

Attachment 2

Simmons v. Motorola Solutions, Inc., No. 2024-L-010142 (Circuit Court of Cook County, Illinois)

CLAIM FORM

Instructions. Fill out each section of this form and sign where indicated.

THIS CLAIM FORM MUST BE COMPLETED AND MAILED TO THE SETTLEMENT ADMINISTRATOR OR FILLED OUT AND SUBMITTED ON THE SETTLEMENT WEBSITE BY JULY 29, 2025.

Please note that this Claim Form will be examined and verified by the Settlement Administrator.

CONTACT INFORMATION

First Name	MI	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>
Street Address		
<input type="text"/>		
City	State	ZIP Code
<input type="text"/>	<input type="text"/>	<input type="text"/>
Email Address		
<input type="text"/>		

You must complete either (1) or (2) below:

- (1) If you received a postcard notice with an assigned Unique Claim ID, write it here:

Unique Claim ID:

- (2) If you do not have a Unique Claim ID, but believe you are a Settlement Class Member, please provide the following information and attach supporting documentation:

The location and date (month and year) you are contending a photo was taken in which your face was processed using the FaceSearch technology, and the law enforcement agency that took or uploaded the photo:

City	State
<input type="text"/>	<input type="text"/>

Date

<input type="text"/>	<input type="text"/>
MM	YYYY

Law Enforcement Agency

Please provide supporting documentation to prove your contentions.

PAYMENT ELECTION

Please select from the options below how you would like to receive your Settlement Payment:

Digital Payment* Paper Check

* You must provide a valid email address on page 1 to receive a digital payment.

For more information, visit www.simmonsBIPAsettlement.com.

By signing below and submitting this Claim Form, I attest that the information in this Claim Form is true and correct to the best of my knowledge. I understand that my Claim Form may be subject to audit, verification, and Court review.

[Signature box]

Signature

Date: [MM] - [DD] - [YY]

[Printed Name box]

Printed Name

Simmons v. Motorola Solutions, Inc.
Settlement Administrator
P.O. Box 2920
Portland, OR 97208-2920

FILED DATE: 8/12/2025 9:28 PM 2024L010142

For more information, visit www.simmonsBIPAsettlement.com.

Attachment 3

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Simmons v. Motorola Solutions, Inc., Case No. 2024-L- 010142
(Circuit Court of Cook County, Illinois)

*For more information, visit www.simmonsBIPAsettlement.com.
Para informacion en Espanol, visitar www.simmonsBIPAsettlement.com.*

PLEASE READ THIS NOTICE CAREFULLY. YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT IF YOUR FACE APPEARED IN IMAGES THAT WERE PROCESSED USING FACESEARCH TECHNOLOGY

***A state court authorized this notice of a proposed class action settlement.
This is not a solicitation from a lawyer and is not notice of a lawsuit against you.***

- A Settlement has been reached in a class action lawsuit against Motorola Solutions, Inc. (“Motorola Solutions”) and Vigilant Solutions LLC (“Vigilant”; together with Motorola Solutions, “Defendants”), which provided law enforcement customers with facial recognition technology known as FaceSearch and with access to a gallery of booking photos. The lawsuit alleges that Motorola Solutions and Vigilant violated an Illinois law called the Illinois Biometric Information Privacy Act (“BIPA”) by allegedly collecting, storing, using, and disclosing individuals’ biometric data in connection with providing FaceSearch and access to the booking photo gallery, allegedly without complying with the law’s requirements. The case is *Simmons v. Motorola Solutions, Inc.*, Case No. 2024-L-010142, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division. The proposed Settlement is not an admission of wrongdoing by Motorola Solutions and Vigilant. Motorola Solutions and Vigilant deny that they violated the law. The Court has not decided who is right or wrong. Rather, to avoid the time, expense, and uncertainty of litigation, the Parties have agreed to settle the lawsuit. The Settlement has been preliminarily approved by a court in Chicago, Illinois.
- You are included in the Settlement if your face appeared in images processed using FaceSearch at any point in time up to April 9, 2025 **and** you either: (a) are or were an Illinois resident; or (b) were present in Illinois at the time the images were taken or processed.
- If the Court approves the Settlement, members of the Settlement Class who submit valid claims will receive an equal, or *pro rata*, share of a \$47,500,000 settlement fund that Motorola Solutions and Vigilant have agreed to establish. Each individual who submits a valid claim will receive a portion of this fund, after all notice and administration costs, the incentive awards, and attorneys’ fees—if approved by the Court—have been paid. Payments are estimated to be \$200-\$550, but could be more or less depending on the number of valid claim forms submitted.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	This is the only way to receive a payment.	July 29, 2025
DO NOTHING	You will receive no payment under the Settlement and give up your rights to sue Motorola Solutions and Vigilant about the issues in this case.	
EXCLUDE YOURSELF	You will receive no payment, but you will retain any rights you currently have to sue Motorola Solutions and Vigilant about the issues in this case. (You may not exclude yourself and also submit a claim form).	July 8, 2025

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

FILED DATE: 8/12/2025 9:28 PM 2024L010142

OBJECT	Write to the Court explaining why you don't like the Settlement. (You may object and also submit a claim form).	July 8, 2025
ATTEND A HEARING	If you file a written objection, you may also ask to speak in Court about the fairness of the Settlement.	

These rights and options—and the deadlines to exercise them—are explained in this notice.

The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be provided only after any issues with the Settlement are resolved. Please be patient.

BASIC INFORMATION

1. What is this lawsuit about?

The Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1, *et seq.*, prohibits private companies from collecting, capturing, obtaining, or possessing the biometric identifiers and/or information of an individual without complying with the requirements of the statute. This lawsuit alleges that Defendants violated BIPA and were unjustly enriched by allegedly collecting, capturing, obtaining, using, storing, and disclosing individuals’ biometric data in connection with providing the FaceSearch technology and a gallery of booking photos to law enforcement customers, without complying with the statute. Defendants contest these claims and deny that they violated BIPA or committed any other wrongdoing, and deny that Plaintiffs or the putative class members are entitled to recover anything from Defendants.

More information about the complaint in the lawsuit and the Defendants’ position can be found in the “Court Documents” section of the settlement website at www.simmonsBIPAsettlement.com.

2. Why is this a Class Action?

A class action is a lawsuit in which an individual called a “Class Representative” brings a single lawsuit on behalf of other people who have similar claims. All of these people together are a “Class” or “Class Members.” Once a Class is certified, a class action Settlement finally approved by the Court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

3. Why is there a Settlement?

To resolve this matter without the expense, delay, and uncertainties of litigation, the Parties have reached a Settlement, which resolves all claims in the case against Defendants and their affiliated entities and individuals. The Settlement requires Defendants to pay money to the Settlement Class, as well as pay settlement administration expenses, attorneys’ fees and costs to Class Counsel, and incentive awards to the Class Representatives, if approved by the Court. The Settlement is not an admission of wrongdoing by Defendants and does not imply that there has been, or would be, any finding that Defendants violated the law.

The Court has already preliminarily approved the Settlement. Nevertheless, because the settlement of a class action determines the rights of all members of the class, the Court overseeing this lawsuit must give final approval to the Settlement before it can be effective. The Court has preliminarily certified the Settlement Class for settlement purposes only, so that members of the Settlement Class can be given this notice and the opportunity to exclude themselves from the Settlement Class, to voice their support or opposition to final approval of the Settlement, and to submit a Claim Form to receive the

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

relief offered by the Settlement. If the Court does not enter a Final Approval Order approving the Settlement, or if the Settlement Agreement is terminated by the Parties, the Settlement will be void, and the lawsuit will proceed as if there had been no settlement and no certification of the Settlement Class.

4. Who is in the Settlement Class?

You are a member of the Settlement Class if your face appeared in an image or images that were processed using the FaceSearch technology at any point in time through April 9, 2025 **and** you: (a) are or were an Illinois resident; or (b) were present in Illinois at the time the image(s) was taken or processed.

Excluded from the Settlement Class are: (1) any Judge or Magistrate presiding over this action and members of their families, (2) the Defendants, Defendants' subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendants or their parents have a controlling interest, (3) persons who properly execute and file a timely request for exclusion from the Settlement Class, and (4) the legal representatives, successors or assigns of any such excluded persons.

THE SETTLEMENT BENEFITS

5. What does the Settlement provide?

Cash Payments. If you're eligible, you can file a claim to receive a cash payment. The amount of such payment is estimated to be approximately \$200-\$550, but is unknown at this time and could be more or less depending on the number of valid Claim Forms submitted. This would be an equal share of a \$47,500,000 fund that Motorola Solutions and Vigilant have agreed to create, after the payment of settlement expenses, attorneys' fees, and any incentive awards for the named plaintiffs in the litigation approved by the Court.

HOW TO GET BENEFITS

6. How do I get a payment?

If you are a Settlement Class member and you want to get settlement benefits, you must complete and submit a valid Claim Form by **July 29, 2025**. An online Claim Form is available on this website and can be filled out and submitted online. You can also get a paper Claim Form by calling 1-855-688-8844. We encourage you to submit a claim online. It's faster, and it's free.

The Claim Form requires you to provide the following information: (i) full name, (ii) current U.S. Mail address, and (iii) either (1) your assigned Claim ID number, or (2) the location and date that you are contending your photo was taken, and the law enforcement agency that took or uploaded the photo, and supporting documentation.

7. What rights am I giving up in this Settlement?

Unless you exclude yourself from this Settlement, you will be considered a member of the Settlement Class, which means you give up your right to file or continue a lawsuit against Defendants or certain related entities and individuals relating to the alleged collection, use, storage, and disclosure of your biometric data. Giving up your legal claims is called a release. The precise terms of the release are in the Settlement Agreement, which is available on the Settlement Website. Unless you formally exclude yourself from this Settlement, you will release your claims whether or not you submit a Claim Form

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

and receive payment. If you have any questions, you can talk for free to the attorneys identified below who have been appointed by the Court to represent the Settlement Class, or you are welcome to talk to any other lawyer of your choosing at your own expense.

8. When will I be paid?

The hearing to consider the fairness of the Settlement is scheduled for August 20, 2025 at 9:30 a.m. If the Court approves the Settlement, Settlement Class members whose claims were approved by the Settlement Administrator will be sent a check or potentially an electronic payment. Please be patient. All checks will expire and become void 90 days after they are issued. Uncashed checks will be donated to a not-for-profit entity agreed to by the Parties and approved by the Court, or such other organization as the Court may order consistent with the Illinois statutory requirements for *cy pres* recipients.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer?

Yes, the Court has appointed lawyers Jon Loevy and Mike Kanovitz of Loevy & Loevy to represent you and other Class Members. These attorneys are called “Class Counsel.” In addition, the Court appointed Plaintiffs Irene Simmons and Rodell Sanders to serve as the Class Representatives. They are Class Members like you. Class Counsel can be reached by phone or email using the contact information set forth in the “Who Represents the Class” section below.

10. Should I get my own lawyer?

You don’t need to hire your own lawyer because Class Counsel is working on your behalf. You may hire your own lawyer, but if you want your own lawyer, you will have to pay that lawyer.

11. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys’ fees of up to 34% of the Settlement Fund plus expenses, and will also request incentive awards of \$7,500.00 for each Class Representative from the Settlement Fund. The Court will determine the proper amount of any attorneys’ fees and expenses to award Class Counsel and the proper amount of any award to the Class Representative. The Court may award less than the amounts requested.

YOUR RIGHTS AND OPTIONS

12. What are my options?

(1) Accept the Settlement.

To accept the Settlement, you must submit a Claim Form by **July 29, 2025**. You may obtain a copy of the Claim Form at www.simmonsBIPAsettlement.com, and you may submit your Claim Form online at the same website, or by U.S. Mail to the Settlement Administrator at *Simmons v. Motorola Solutions, Inc.*, Settlement Administrator, PO Box 2920, Portland, OR 97208-2920. If the Settlement is approved and your claim is deemed valid, a check will be mailed to you. ***Submitting a valid and timely Claim Form is the only way to receive a payment from this Settlement, and is the only thing you need to do to receive a payment.***

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

(2) Exclude yourself.

You may exclude yourself from the Settlement. If you do so, you will not receive any cash payment, but you will not release any claims you may have against the Released Parties (as that term is defined in the Settlement Agreement) and are free to pursue whatever legal rights you may have by pursuing your own lawsuit against the Released Parties at your own risk and expense. All exclusion requests must (a) be in writing; (b) identify the case name *Simmons v. Motorola Solutions, Inc.*, 2024-L-010142; (c) state the full name and current address of the person in the Settlement Class seeking exclusion; (d) include their assigned Claim ID number or a statement and supporting documentation showing why he or she believes himself or herself to be a member of the Settlement Class including the location and date that they are contending their photo was taken and the law enforcement agency that took or uploaded the photo, (e) be signed by the person(s) seeking exclusion; and (f) be postmarked or received by the Settlement Administrator on or before the Objection/Exclusion Deadline. Each request for exclusion must also contain a statement to the effect that “I hereby request to be excluded from the proposed Settlement Class in *Simmons v. Motorola Solutions, Inc.*, 2024-L-010142 (Cook Cnty. Cir. Ct.).” You must mail or e-mail your exclusion request no later than **July 8, 2025**, to:

Simmons v. Motorola Solutions, Inc.
Settlement Administrator
PO Box 2920
Portland, OR 97208-2920
exclusions@simmonsBIPAsettlement.com

No person may request to be excluded from the Settlement Class through “mass” or “class” opt-outs.

(3) Object to the Settlement.

If you wish to object to the Settlement, you must file a letter or brief in writing with the Clerk of the Court of the Circuit Court of Cook County, Illinois, Richard J. Daley Center, 50 West Washington Street, Room 2601, Chicago, Illinois 60602. The objection must be received by the Court no later than **July 8, 2025**. You must also send a copy of your objection by email to the attorneys for all Parties to the lawsuit, including Class Counsel (Jonathan Loevy and Michael Kanovitz of LOEVY & LOEVY, jon@loevy.com and mike@loevy.com), as well as Defendants’ counsel (David Layden of JENNER & BLOCK, LLP, dlayden@jenner.com) no later than **July 8, 2025**. Any objection to the proposed Settlement must include (a) your full name and current address, (b) your assigned Claim ID number or a statement and supporting documentation showing why you believe you are a member of the Settlement Class including the location and date that you contend your photo was taken and the law enforcement agency that took or uploaded the photo, (c) the specific grounds for your objection, (d) all documents or writings that you wish the Court to consider, (e) the name and contact information of any attorneys representing, advising, or in any way assisting you with the preparation or submission of the objection; and (f) a statement indicating whether you intend to appear at the Final Approval Hearing. If you hire an attorney in connection with making an objection, that attorney must also file with the court a notice of appearance by the objection deadline of **July 8, 2025**. If you do hire your own attorney, you will be solely responsible for payment of any fees and expenses the attorney incurs on your behalf. If you exclude yourself from the Settlement, you cannot file an objection.

Class Counsel will file with the Court and post on the settlement website its request for attorneys’ fees and incentive awards on June 17, 2025.

You may appear at the Final Approval Hearing, which will be held on August 20, 2025 at 9:30 a.m. in Courtroom 2601 of the Circuit Court of Cook County, Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602, in person or through counsel to show cause why the proposed Settlement should not be approved as fair, reasonable, and adequate. Attendance at the

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

hearing is not necessary; however, persons wishing to be heard orally in opposition to the entry of the Final Approval Order, the request for attorneys' fees and expenses, and/or the request for incentive awards to the Class Representatives are required to indicate in their written objection their intention to appear at the hearing on their own behalf or through counsel and to identify the names of any witnesses they intend to call to testify at the Final Approval Hearing, as well as any exhibits they intend to introduce at the Final Approval Hearing.

(4) Do Nothing.

If you do nothing, you will receive no money from the Settlement Fund, but you will still be bound by all orders and judgments of the Court. Unless you exclude yourself from the Settlement, you will not be able to file or continue a lawsuit against Defendants or other Released Parties regarding any of the Released Claims. *Submitting a valid and timely Claim Form is the only way to receive a payment from this Settlement.*

To submit a Claim Form, or for information on how to request exclusion from the class or file an objection, please visit the Settlement Website, www.simmonsBIPAsettlement.com, or call 1-855-688-8844.

THE COURT'S FINAL APPROVAL HEARING

13. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing at 9:30 a.m. on August 20, 2025 before the Honorable Joel Chupack in Room 2601 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Class; and whether it was made in good faith. **At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representatives.**

Note: The date and time of the fairness hearing are subject to change by Court Order, and the hearing may be conducted remotely. Any changes will be posted at the settlement website, www.simmonsBIPAsettlement.com.

14. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. You are, however, welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was filed or mailed on time and meets the other criteria described in the Settlement, the Court will consider it. You may also pay a lawyer to attend, but you don't have to.

15. May I speak at the hearing?

Yes. If you do not exclude yourself from the Class, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement. If you file an objection and intend to appear at the hearing, you must state your intention to do so in your objection.

16. Who represents the Class?

The Court has approved the following attorneys to represent the Settlement Class. They are called “Class Counsel.” You will not be charged for these lawyers. If you want to be represented by your own lawyer instead, you may hire one at your own expense.

Jonathan I. Loevy
Michael I. Kanovitz
LOEVY & LOEVY
311 N. Aberdeen, 3rd Floor
Chicago, Illinois 60607
312.243.5900
jon@loevy.com
mike@loevy.com

17. Where can I get additional information?

This Notice is only a summary of the proposed Settlement of this lawsuit. More details are in the Settlement Agreement which, along with other documents, can be obtained at www.simmonsBIPAsettlement.com. If you have any questions, you can also call the Settlement Administrator at 1-855-688-8844 or Class Counsel at the number or email addresses set forth above. In addition to the documents available on the case website, all pleadings and documents filed in court may be reviewed or copied in the Office of the Clerk. Please do not call the Judge or the Clerk of the Court about this case. They will not be able to give you advice on your options.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, THE DEFENDANTS, OR THE ILLINOIS LAW ENFORCEMENT AGENCY THAT TOOK YOUR BOOKING PHOTO WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.

Questions? Visit www.simmonsBIPAsettlement.com or call toll free 1-855-688-8844

Attachment 4

57° Detroit, MI



My Dashboard

Today

Hourly

10 Day

Weekend

Monthly

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Latest

More Forecasts

Advertisement: Clothing items with discounts

- 62% off: Orange patterned dress, \$16
- 18% off: Pink patterned dress, \$22
- 70% off: Black patterned shirt, \$26
- 59% off: Light blue patterned dress, \$22
- 16% off: Pink patterned dress, \$6

Detroit, MI

As of 11:19 am EDT

57°

Cloudy

Day 58° • Night 54°

Watch: Scan Reveals Turtle's Surprise

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If you are or were an Illinois resident or were present in Illinois and your photo was taken or used by law enforcement,

Weather Today in Detroit, MI

Feels Like

55°

6:00 am 8:59 pm

High / Low 58°/54°

Wind ← 11 mph

Humidity 77%

Dew Point 50°

Pressure ↓ 30.07 in

UV Index 3 of 11

Visibility 9 mi

Moon Phase Waxing Crescent

Tracking A Twister's Lifespan



From Spinning Up To Debris Cloud

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Detroit, MI

As of 11:19 am EDT

57°

Cloudy

Day 58° • Night 54°

Watch: Scan Reveals Turtle's Surprise

you may be eligible for payment.

Learn More



Weather Today in Detroit, MI

Feels Like

55°

6:00 am 8:59 pm

High / Low 58°/54°

Wind 11 mph

Humidity 77%

Dew Point 50°

Pressure ↓ 30.07 in

UV Index 3 of 11

Visibility 9 mi

Moon Phase Waxing Crescent

Tracking A Twister's Lifespan



From Spinning Up To Debris Cloud

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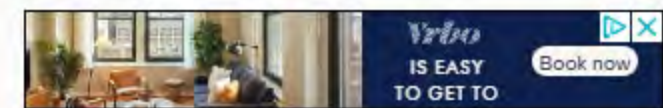
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TRENDING: 🍕 My Pi closing 🦕 Fossils near Chicago 📺 TV for summer 🎬 Top 10 summer movies 🗣️ Asking Eric 📅 Today in History



Chicago fatal car crash totals remain stubbornly high in pandemic's wake

Elected officials and activists blame everything from too few police to street design for stubbornly high totals of fatal car crashes.



LATEST HEADLINES

US Coast Guard warns beachgoers of missing armed pyrotechnics device after one found on Montrose Beach 16 hours ago

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If you are or were an Illinois resident or were present in Illinois and your photo was taken or used by law enforcement, you may be eligible for payment.

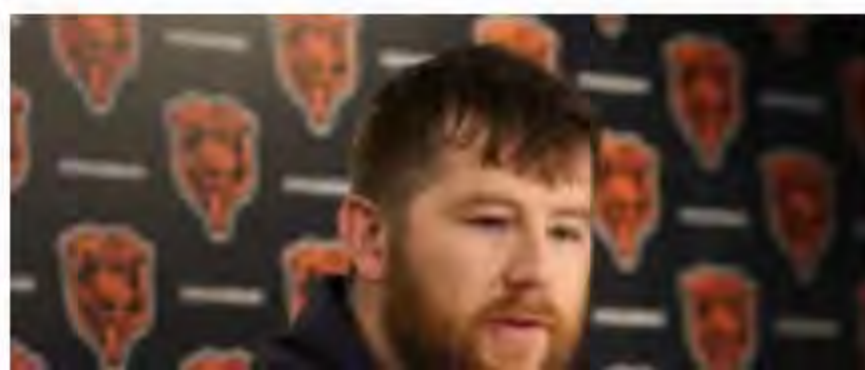
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CPS board eyes candidates for interim and permanent CEO



Chicago Bears proposed move to Arlington Heights would require complicated approval



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What to know as Iowa modernizes its 50-plus-year-old unemployment system

BUSINESS 9:56 a.m. CT May 28



Ankeny burger joint closes after winning best burger contest in 2024

DINING 9:37 a.m. CT May 28



What to order at the new French, Japanese restaurant in Des Moines

DINING 8:11 a.m. CT May 28



Iowa joins red states waging Trump's fight against DEI with new law

POLITICS 7:59 a.m. CT May 28

Top Headlines

Mother sues Des Moines Public Schools over her teen's suicide

Graduation photos: See all the DMPS high schools in one spot

2025 All-Iowa boys state track and field teams

Waukee's Evan Jacobson breaks down recruitment, offers

Police trying to determine how missing girl got to Tennessee

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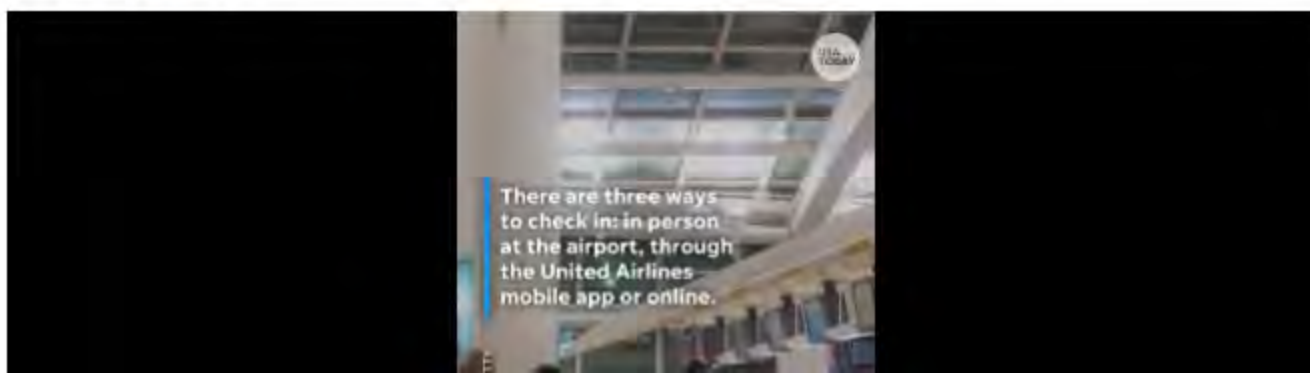
Give yourself the gift of self-care



FAMILY DOLLAR

Clip Coupon

Watch Now



There are three ways to check in: in person at the airport, through the United Airlines mobile app or online.

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Learn More



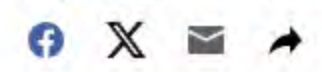
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NBA Playoffs Add Topic +

Pacers vs. Knicks Game 4 highlights: Indiana one win from NBA Finals

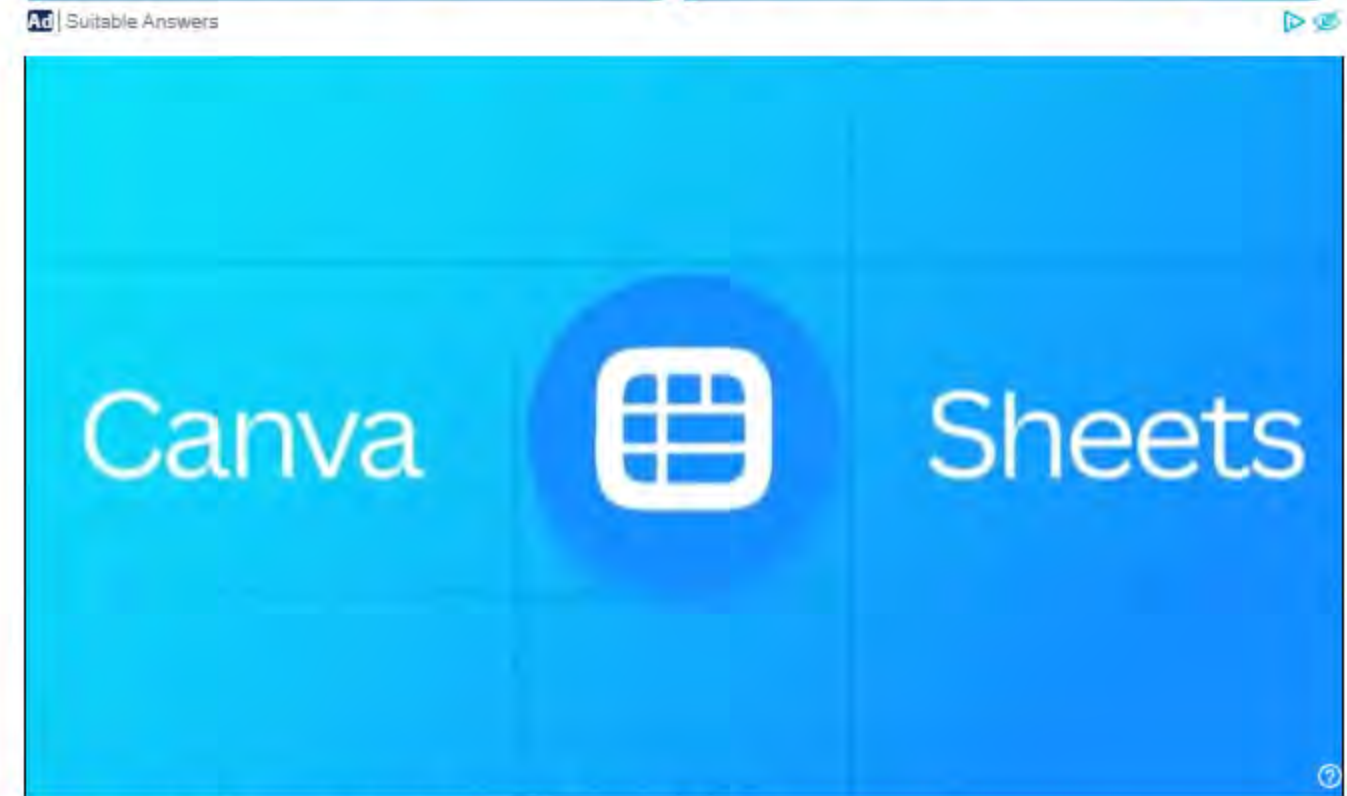
Lorenzo Reyes, Jeff Zillgitt, Jordan Mendoza and Heather Tucker

May 27, 2025 Updated May 28, 2025, 1:01 a.m. ET



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Can the Knicks push the Pacers to a Game 6 or 7?
 The Knicks have all the momentum after a 20-point comeback win in Game 3. Can they win Game 4 and make this series against the Pacers a tight one?



This time, the New York Knicks dug themselves a hole too big. Two days after they clawed back from a 20-point deficit to pull out a much-needed victory, New York could not overcome its fourth quarter deficit Tuesday night as the Indiana Pacers took Game 4, 130-121, to secure a commanding 3-1 series lead in the Eastern Conference finals.

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Movies

I attended Cannes Film Festival for the 1st time. These are the movies I'd tell you to see — and skip — when they arrive in theaters.

See 'Mission: Impossible — The Final Reckoning' in theaters, rent 'Cheech &...



See 'Final Destination: Bloodlines' in theaters, rent 'A Minecraft Movie' or 'Snow Whit...

302



Tom Cruise, the Croisette and lots of clapping: What I saw at the 'Mission: Impossib...

104



Entertainment

Barbara Walters shares flirtatious moment with Clint Eastwood in 'Tell Me Everything' trailer

Viewers will get to see a candid look at the legendary broadcast career of Barbara Walters in an upcoming docuseries. The...

Good Morning America / 2 min read



AD WalletJump

Seniors Born 1941-1979 Receive 55 Benefits This Month if They Ask



Celebrity

Jenna Ortega Says Her 'Wednesday' Character Would 'Hate' the Commercialization of the Series

"She's an outsider, but now she's on these mugs, cereal boxes, and T-shirts."

Indiewire / 3 min read



Celebrity

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Movies

DIE MY LOVE
Entertainment Yahoo Movies

THE PHOENICIAN SCHEME
BENICIO DEL TORO
ADMIT ONE

SOUND OF FALLING
ADMIT ONE

I attended Cannes Film Festival for the 1st time. These are the movies I'd tell you to see — and skip — when they arrive in theaters.

Entertainment Yahoo ... 136

See 'Mission: Impossible — The Final Reckoning' in theaters, rent 'Cheech &...



See 'Final Destination: Bloodlines' in theaters, rent 'A Minecraft Movie' or 'Snow Whit...

Yahoo Movi... / 302



Tom Cruise, the Croisette and lots of clapping: What I saw at the 'Mission: Impossib...

Yahoo Movi... / 104



Entertainment

Barbara Walters shares flirtatious moment with Clint Eastwood in 'Tell Me Everything' trailer

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Celebrity

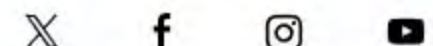
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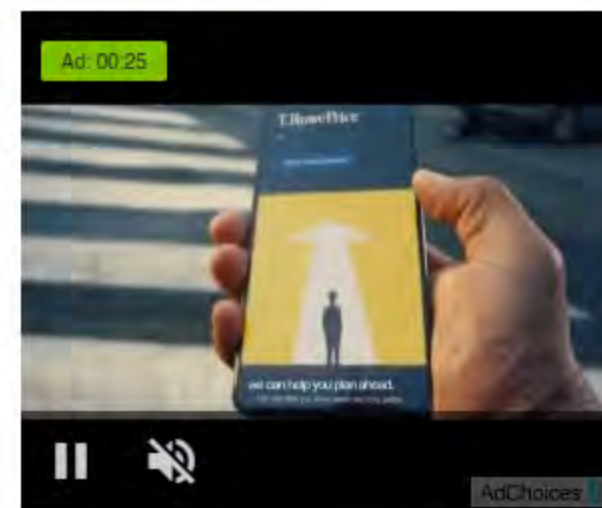
INDEPENDENT

National Hamburger Day 2025: Where to get a free or discounted burger

Caitlin Hornik

Wed, May 28, 2025 at 8:54 AM EDT · 3 min read

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National Hamburger Day 2025. Where to get a free or discounted burger

Generate Key Takeaways

National Hamburger Day is celebrated on May 28, just a day after Memorial Day.

To celebrate, several fast food chains and restaurants are offering free or highly discounted burgers.

Here, we round up the best freebies and deals to celebrate National Hamburger Day.

Shake Shack

For a limited time, the fast-food franchise will be offering a free burger to all patrons who spend \$10 or more. The deal will run from the first of May until the first of June.

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Dan Devine • Senior writer

May 28, 2025 at 9:21 AM EDT • 10 min read



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Chicago



56°

Rain, feels like 58°

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Power up Your Brain



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Crossword 31.7K people playing



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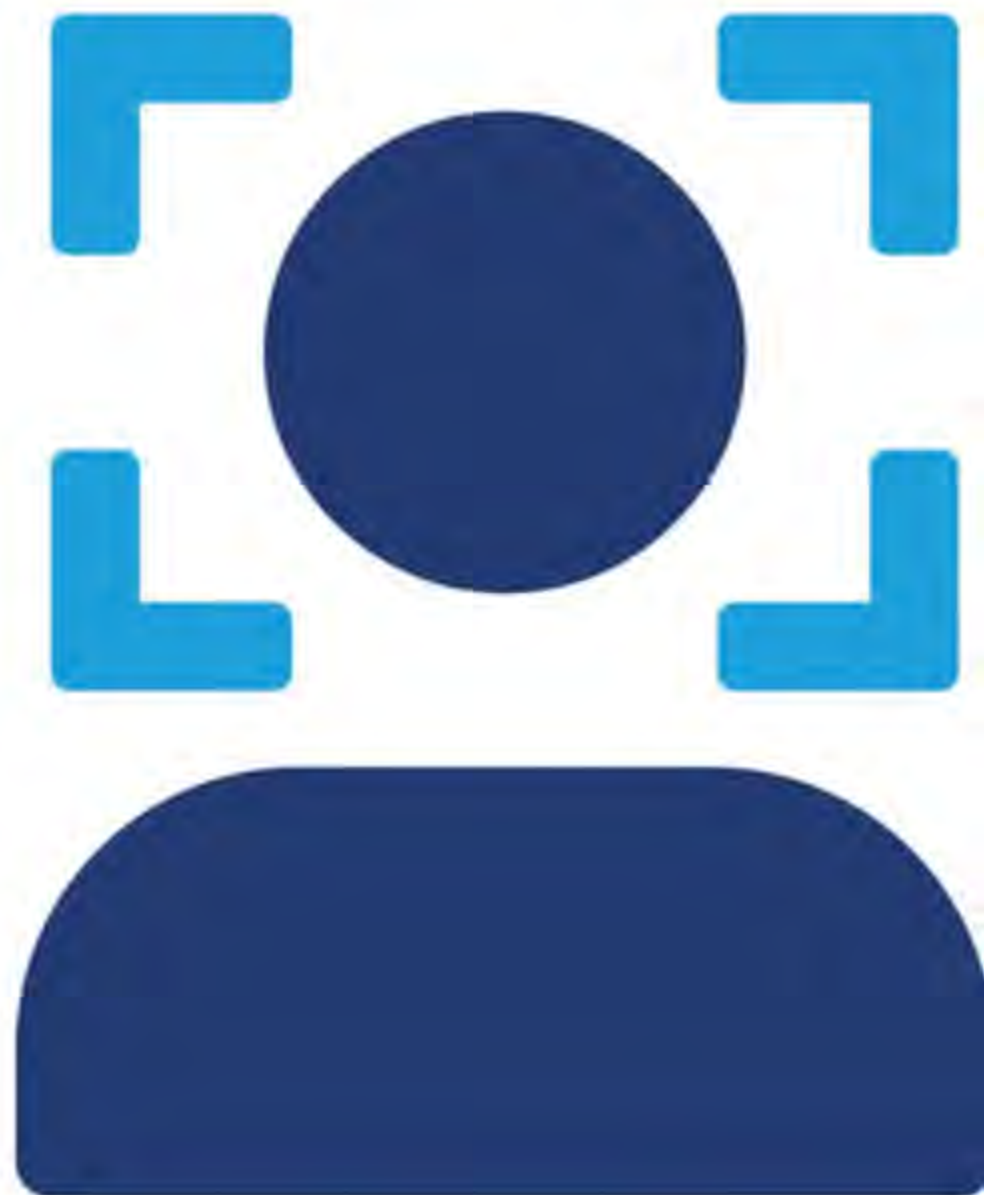


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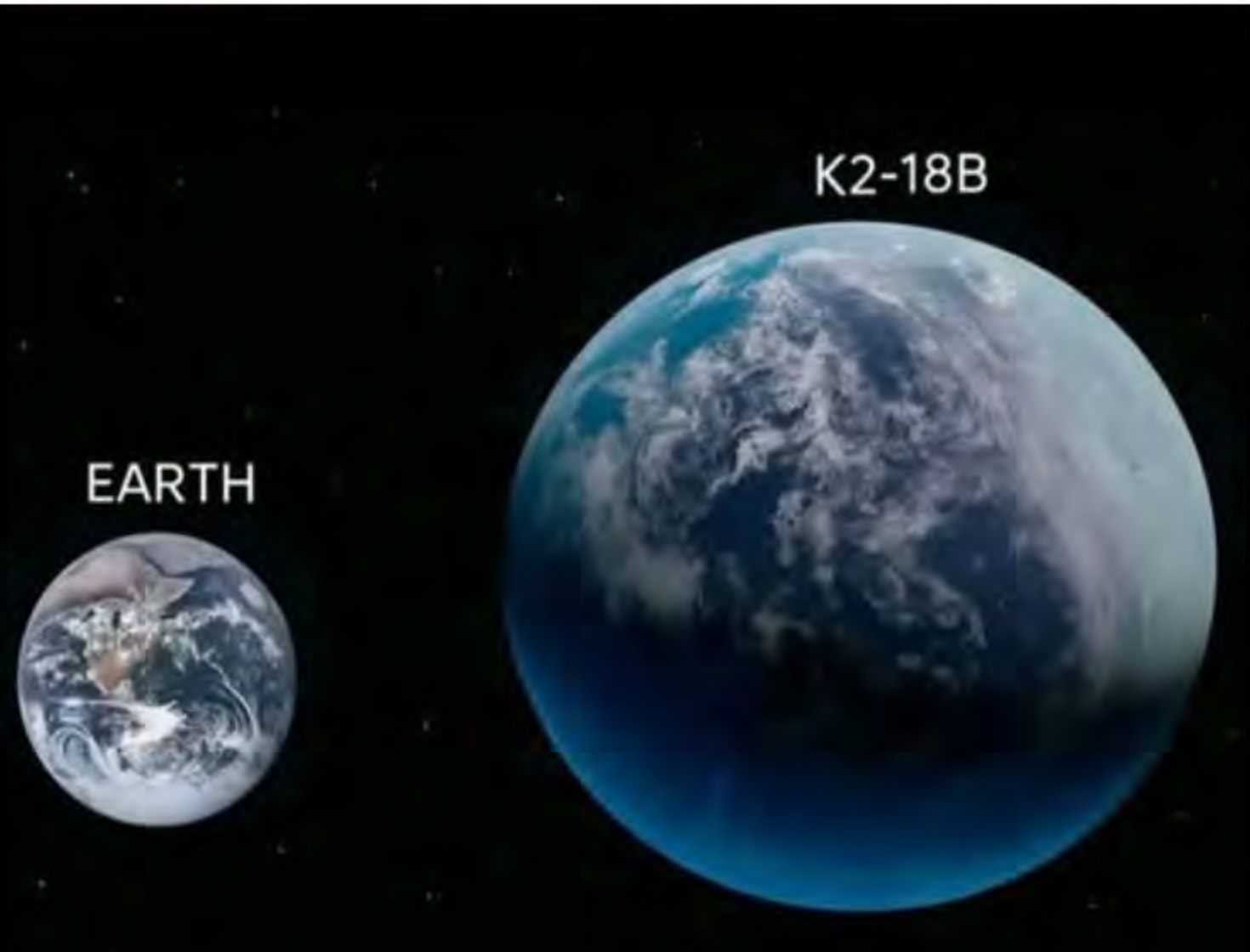
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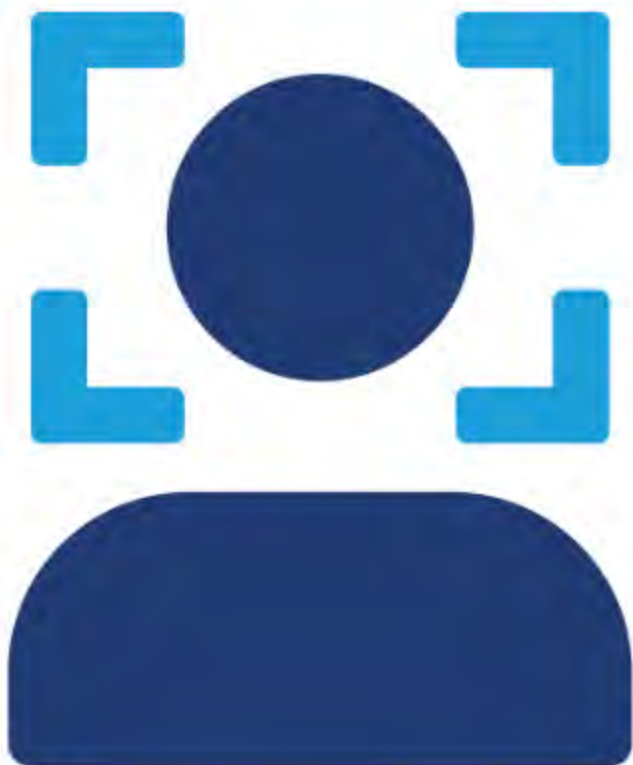


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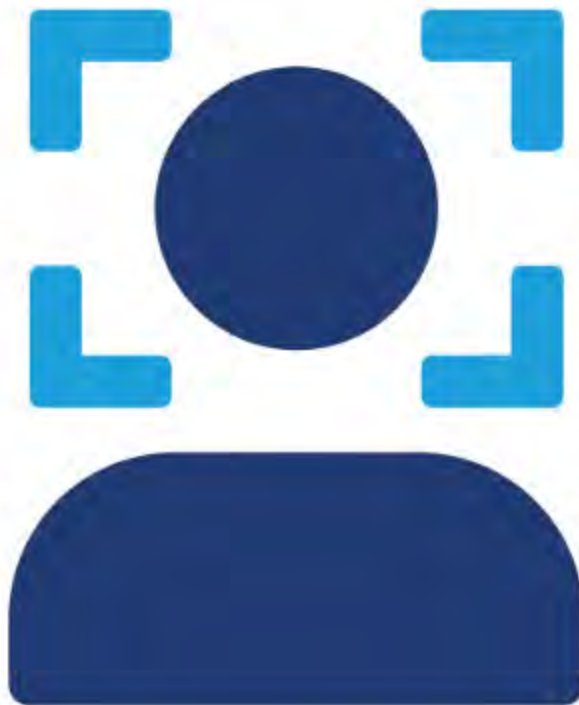


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Attachment 5

CHICAGOLAND

AG: No violations at Cook County hospital's nonprofit

By A.D. Quig
Chicago Tribune

A state probe into a potential conflict of interest and spending issues at the nonprofit supporting Cook County's hospital system has closed after no violations were found, though internal strife that launched that investigation has led to roughly half the board's members leaving over the past year.

Attorney General Kwame Raoul's office said in a statement it told the Cook County Health Foundation in September it "would not be seeking further information" into allegations of "serious governance issues," including a potential conflict of interest violation. That effectively closed the book on its investigation.

Of the nine board members who left the foundation in 2024, some had gone public with their concerns that the organization was spending its limited donor dollars to pursue new responsibilities beyond the foundation's capacity and without proper board sign-off. That money should have instead gone to directly

support CCH's mission to give county residents universal access to health care regardless of their ability to pay, they argued.

Those board members ordered up an outside audit from the law firm Riley Safer Holmes & Cancila. Months later and in the middle of the attorney general's probe, they said those recommendations were not taken up and tried to oust the foundation's executive director, Sylvia Zaldivar.

"We tried to work with the board and resolve the issues that were raised in the Riley Safer report and internally as a board. Those issues and concerns were not addressed and as a result, myself and others resigned," attorney William Quinlan, one of those board members, told the Tribune late last month.

Board member Danielle Stilz left the board the same time as Quinlan. She said in her resignation letter that there was leadership resistance to "fully cooperate with the Attorney General's investigation," or to remedy the conflict of interest the Riley Safer report highlighted.

Quinlan and Stilz helped spearhead the unsuccessful effort to oust Zaldivar with two other board members in August, according to communications reviewed by the Tribune. An outside attorney for the foundation said the vote — five in favor, one against, and five not voting — was improper because it was conducted electronically. Quinlan noted several other resolutions had been voted on by email over the previous year. He and Stilz resigned soon after, around the same time as two other board members who signed onto the resolution calling for Zaldivar's firing.

Joseph Flanagan, the board chair, wrote in a frustrated response to Quinlan's resignation that Quinlan made several unfounded allegations. "Had the Board wished to change Executive Directors it would have done so, but there was no need to do that," he wrote. "Our leadership carefully manages the Foundation and carefully cares for taxpayer funds while making full disclosure to the Board."

"Most of those who resigned from our Board did so because of the disruption

of Board meetings," Flanagan wrote. "We expect that many will now rejoice."

Records suggest one member returned to the board.

In an email to the Tribune, Zaldivar said the board "adopted new bylaws in 2024 following recommendations from legal counsel. These updates are in effect and reflect strengthened governance practices." But Zaldivar did not elaborate on what had changed.

Last spring, the Illinois attorney general's Charitable Trust Bureau launched a probe of the foundation following Tribune reporting about potential conflicts of interest, unauthorized spending and missing board input on a potential major revamp of the nonprofit.

Foundation leaders and the head of Cook County Health explored, but abruptly scrapped, an idea to grow beyond CCHF's historic mission as a modest fundraising entity into a much larger and more complex manager of grants or clinical trials.

The health foundation was founded 15 years ago to support the mission of the

county's public hospitals and clinics. Its annual revenue ranged from \$400,000 to \$1.7 million in recent years, according to federal filings. The foundation has also received taxpayer funds to administer the Provident Scholarship program, which provides up to \$20,000 to medical students and up to \$10,000 to other health care students "who are from, and dedicated to serving, underrepresented communities in Cook County."

CCH's then-CEO Israel Rocha Jr. and the foundation began discussions in 2023 to expand that role. The foundation paid about \$80,000 to two outside law firms to help negotiate a "master services agreement" that would guide future partnerships with the health system.

A group of board members concerned about transparency around those negotiations and potential violations of so-called Shkman rules against political hiring commissioned the Riley Safer review. Their January 2024 report flagged a conflict of interest involving a law firm tied to a board member, "serious failures" to follow corporate gover-

nance practices, and trouble tracking down what services another firm provided.

Zaldivar supported the expansion and denied any impropriety, saying last year that the Riley Safer report contained inaccuracies: The board was kept informed throughout negotiations, the conflict was disclosed, and the other outside law firms' work was necessary and valuable. Foundation leadership was otherwise already aware and addressing governance issues the Riley Safer report raised, she said.

In late April last year, following the Tribune's report, the AG requested a raft of information from the foundation, including conflict-of-interest policies and statements by officers, information about contracts and payments to law firms, and an explanation about why Riley Safer was hired. The foundation hired two more attorneys to rework its bylaws and to respond to AG requests, internal board communications obtained by the Tribune show. One of those attorneys, retired Cook County Circuit Judge Thomas Mulroy, is now a board member.

With tale about jealousy over amateur porn, Brand testifies during murder trial

By Madeline Buckley
Chicago Tribune

Crosetti Brand got out of prison in October 2023 and took a job at a fast-food restaurant, even though he had a grander plan to make money: self-made adult videos and hiring himself out as a male escort.

That's how the 39-year-old man began his testimony to the jury on Monday after Cook County prosecutors earlier in the day rested their case following testimony from more than two dozen witnesses. Many of them gave harrowing accounts of an attack that killed 11-year-old Jayden Perkins and seriously injured his pregnant mother.

"I'm telling y'all what actually really happened," Brand said, sitting in the witness box at the Leighton Criminal Court Building.

Brand is standing trial on charges of murder, attempted murder, home invasion and aggravated domestic battery after prosecutors alleged that he barged into the Edgewater apartment of Laterria Smith

and stabbed her multiple times, before turning his knife on her son, Jayden Perkins, when he tried to intervene. Smith, who used to date Brand, previously said that the two rekindled a relationship, until she backed away when he grew more controlling.

Brand opted to forgo an attorney and represent himself, arguing during a brief opening statement that he was protecting himself during the alleged attack on March 13, 2024.

Telling the jury about his dream of building a lucrative porn business appeared to be another curious choice by Brand as he defends himself, but he said jealousy over his videos with other women led to a confrontation between him and Smith.

Brand told his story to the jury in narrative form after Judge Angela Petrone said he didn't need to ask himself questions, given that he is acting as his own attorney. "I'm not asking you to act like you have two personalities," she said.

"During my time working

at Popeyes, I would develop other projects as well," he said. "Nowadays ... you can upload videos."

Speaking rapidly with bursts of profanity, Brand testified that Smith invited him over, then sneaked a glance into his phone.

"She wound up seeing other sex videos with me with another female," Brand said. "So we arguing."

Brand said the argument grew violent, causing him to stab Smith in self-defense. He said that Smith stabbed Jayden when she tried to lunge at Brand.

But during a vigorous cross-examination, Assistant State's Attorney Danny Hanichak pointed out that Brand's account of that day is contradicted by phone records and other evidence, reading for Brand text messages between the two during which Smith told him to stop bothering her.

Hanichak asked Brand about an order from the Illinois Department of Corrections that he not contact Smith.

"It don't matter what IDOC said but I'm going to

do what I want to do," Brand said, arguing that Smith wanted to see him despite the order.

"Within 90 minutes of getting out, you're calling Laterria?" Hanichak asked.

"I mean, yeah how long are you going to stay on this subject?" Brand responded.

"As long as it takes, Mr. Brand," Hanichak said.

Last week, prosecutors called their final witness, the Chicago police detective who was the lead investigator in the case.

Detective Michael Carroll took jurors through his team's investigation, starting at the apartment in the 5900 block of North Ravenswood Avenue and continuing as they collected surveillance video, interviewed Smith and other witnesses and ultimately arrested Brand at his South Side home.

Through surveillance videos, detectives were able to track Brand — their primary suspect — leaving the Edgewater apartment and tossing a knife away, Carroll said.

Through video, they watched him enter the Bryn



A photo of Jayden Perkins, the 11-year-old boy who was stabbed to death in his home on March 13, 2024, is placed at a memorial outside Perkins home in Chicago. VINCENT ALBAN/CHICAGO TRIBUNE

Mawr Red Line station, toss his shoes in a garbage can and take the train south to 47th Street.

Via cameras at a gyro shop near the 47th Street station, they saw Brand then throw out some clothes in another bin.

Carroll described the often painstaking work of tracking people through the city's network of public and private surveillance systems. In one instance, detectives saw on video that a man dug into the garbage can and took the shoes Brand had previously thrown away at the 47th Street train station.

Carroll asked authorities who review CTA cameras to

keep an eye out for the man. They found him, Carroll said, and retrieved the shoes.

"I asked them to take custody of (the shoes) and buy him a new pair," Carroll said.

Jurors also watched a video of Smith lying in a hospital bed with bandages throughout her body as she identified her attacker.

"That's CO," Smith said, pointing to a photograph of Brand while referring to him by his nickname.

Smith previously took the stand for hours, telling the jury that Brand harassed and threatened her in the weeks and months leading up to the attack.

US Supreme Court to weigh Illinois mail-in ballot challenge

By Rick Pearson
Chicago Tribune

The U.S. Supreme Court said Monday it would decide whether Republicans can challenge Illinois' law that allows mail-in election ballots to be counted 14 days after Election Day, following lower federal courts' previous dismissals of the GOP effort.

The lawsuit, led by downstate Republican U.S. Rep. Mike Bost, comes as the GOP and President Donald Trump have pushed for the recognition of a singular Election Day ballot count — most recently in a presidential executive order issued in March — despite state laws allowing ballots to be counted after Election Day as long as they are post-marked or voter-signed and certified on or before the election date.

In the Illinois case, both the U.S. District Court and the 7th U.S. Circuit Court of Appeals in Chicago ruled Bost and two presidential electors lacked legal standing when they challenged the law in May 2022. The courts did not decide on the merits of the case regarding the legality of post-Election Day ballot counting.

But in dismissing the lawsuit in July 2023, U.S. District Judge John Kness also wrote that he thought Illinois' 2015 law complied with the U.S. Constitution

as well as federal election law and does "not conflict with the federal mandate that Election Day be held on the Tuesday after the first Monday in November."

"By counting only mail-in ballots postmarked on or before Election Day, the statute does not extend the day for casting votes in a federal election," Kness, a Trump appointee, wrote.

In a 2-1 decision in August of last year, a three-judge panel of the 7th Circuit Court of Appeals sided with the lower court's dismissal due to lack of standing.

Judicial Watch, a conservative legal organization that had worked unsuccessfully with Trump to stop post-Election Day ballot counting in the 2020 presidential race, is representing Bost and appealed last November to the U.S. Supreme Court.

The suit contended the state law violated the federally established date for federal elections. About 20 states have similar post-Election Day counting laws. But in its appeal to the nation's highest court, Judicial Watch noted a federal appeals court in Louisiana last fall sided with Republicans and ruled Mississippi's law allowing mail-in ballot counting after Election Day violated federal law.

Bost has argued the counting of "late, illegal ballots dilutes the value

of" lawfully cast votes and infringes upon his right as a federal candidate to stand for office and that he faces added costs for poll watchers post Election Day.

Bost has also alleged that post-Election Day votes could reduce his margin of victory and that this "will lead to the public perception that my constituents have concerns about my job performance" and would "influence numerous third parties, such as future voters, Congressional leadership, donors and potential political opponents."

Trump has made numerous false, misleading and unsupported claims about mail-in balloting, calling them in his 2020 election loss a "whole big scam." But even as he argued against them, the Republican National Committee and the Illinois Republican Party ramped up efforts to get GOP voters to cast ballots by mail.

Still, the RNC and the National Republican Congressional Committee filed briefs in support of the election law challenge.

Tom Fitton, president of Judicial Watch, called it "an injustice that the courts would deny a federal candidate the ability to challenge an election provision" that they view illegal.

"The Supreme Court's decision to hear this case is a critical opportunity to

uphold federal law, protect voter rights, and ensure election integrity," Fitton said. "Illinois' 14-day extension of Election Day thwarts federal law, violates the civil rights of voters, and invites fraud."

Yet in its appeal, Justice Watch said Bost and the GOP activists "do not allege voter fraud, nor do they allege that ballots were mailed after Election Day, contrary to Illinois law." Instead, they allege ballots

received after Election Day are illegal and are "as invalid as if they were received one year after Election Day."

The U.S. Justice Department under President Joe Biden filed briefs in support of the Illinois law.

COURT AUTHORIZED NOTICE OF CLASS ACTION

You may be entitled to a cash payment from a class action settlement if your face appeared in images processed using FaceSearch technology at any point in time up to April 9, 2025 and you: (a) are or were an Illinois resident; or (b) were present in Illinois at the time the image(s) was taken or processed.

This notice is to inform you that a proposed settlement has been reached in a class action lawsuit against Motorola Solutions, Inc. ("Motorola Solutions") and Vigilant Solutions LLC ("Vigilant"); together with Motorola Solutions, "Defendants"), which provided law enforcement customers with facial recognition technology known as FaceSearch and with access to a gallery of booking photos. The lawsuit alleges that Defendants violated an Illinois law called the Illinois Biometric Information Privacy Act ("BIPA") by allegedly collecting, storing, using, and disclosing individuals' biometric data in connection with providing FaceSearch and access to the booking photo gallery, allegedly without complying with the law's requirements. The case is *Simmons v. Motorola Solutions, Inc.*, Case No. 2024-L-010142, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division. The proposed Settlement is not an admission of wrongdoing by Defendants. Defendants deny that they violated the law. The Court has not decided who is right or wrong.

Am I a Part of the Settlement? You may be a Settlement Class member if your face appeared in images processed by FaceSearch technology at any point in time up to April 9, 2025 and you: (a) are or were an Illinois resident; or (b) were present in Illinois at the time the image(s) was taken or processed. If so, you are eligible to submit a claim to receive cash benefits from this Settlement. More information about this Settlement is available online in the detailed web notice at www.simmonsBIPASettlement.com.

What Does the Settlement Provide? If you're eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The amount of such payment is estimated to be approximately \$200-\$550, but could be more or less depending on the number of valid claims submitted. This amount would be an equal share of a \$47,500,000 fund that Defendants have agreed to create, after the payment of settlement expenses, attorneys' fees, and any incentive awards in the litigation approved by the Court.

How Do I Get My Payment? Visit the Settlement Website, www.simmonsBIPASettlement.com, and submit a Claim Form online. You can also call 1-855-688-8844 to request a paper copy of the Claim Form. **All Claim Forms must be postmarked or submitted online by July 29, 2025.**

What are My Options? You can do nothing, comment on or object to any of the settlement terms, or exclude yourself from the settlement. If you do nothing, you won't be able to sue Motorola Solutions or Vigilant or certain related companies and individuals in a future lawsuit about the claims addressed in the settlement. If you exclude yourself, you won't get a payment but you'll keep your right to sue Motorola Solutions and Vigilant on the issues the settlement concerns. You must contact the settlement administrator by mail or e-mail to exclude yourself. You can also object to the settlement if you disagree with any of its terms. **All Requests for Exclusion and Objections must be received by July 8, 2025.**

Do I Have a Lawyer? Yes. The Court has appointed lawyers from the law firms Loevy & Loevy as "Class Counsel." They represent you and other settlement class members. The lawyers will request to be paid from the total amount that Defendants paid into the Fund. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees. The Court has also chosen Irene Simmons and Rodell Sanders—class members like you—to represent the Settlement Class.

When Will the Court Approve the Settlement? The Court will hold a final approval hearing on August 20, 2025 at 9:30 a.m. before the Honorable Judge Joel Chupack in Room 2601 at the Richard J. Daley Center, 219 S. Dearborn Street, Chicago, Illinois 60604. The Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to 34% of the settlement fund and incentive awards of \$7,500. Class Counsel's request will be available on the Settlement Website.

Where Can I Get More Information? This notice is only a summary. For more information, visit: www.simmonsBIPASettlement.com

Attachment 6

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Simmons IL BIPA Class Action | Facial Recognition Lawsuit

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AI Overview

Biometric class action settlements are increasingly common as companies face lawsuits for allegedly violating biometric privacy laws like the Biometric Information Privacy Act (BIPA) in Illinois. These settlements often involve companies agreeing to pay a lump sum to resolve the lawsuit, with class members receiving a portion of the settlement.

Here's a more detailed look:

What are Biometric Class Action Settlements?

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Coinbase Slammed With Face Scan, Data Breach Lawsuits as Use...

May 19, 2025 · Plaintiffs in the Illinois suit sought \$5,000 per willful BIPA violation and \$1,000 for negligent ones. This isn't the first time Coinbase faced legal heat under BIPA. In May 2023, a...

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BIPA Litigation Tracker — S.T.O.P. - The Surveillance ...

51 out of a total of 182 lawsuits alleged BIPA violations due to the collection, disclosure, and/or dissemination of individuals' facial geometry or facial biometric information. 35 of these 51 case...

About 14,000 results

simmons bipa settlement.com
https://www.simmonsbipasettlement.com

Simmons IL BIPA Class Action | Facial Recognition Lawsuit

Sponsored Current/former IL resident or present in IL and photo was taken/used by law enforcement? To find out more information and to see if you are included, visit the Settlement website.

PR Newswire
https://www.prnewswire.com/news-releases/if-you...

If you are or were an Illinois resident or were present in Illinois ...

18 hours ago - The Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to 34% of the settlement fund and ...

third-news.com
https://third-news.com/article

Settlement Reached in Illinois Class Action over Facial ...

1 day ago - A proposed class action settlement allows eligible Illinois residents to claim payments for unauthorized use of biometric data used by law enforcement. ... (BIPA) by improperly ...

Top Class Actions
https://topclassactions.com/lawsuit-settle...

Motorola Class Action Says 18M Mugshots Collected, ...

Feb 20, 2020 - Motorola and Vigilant captured and maintained a "gallery" of "mugshots" or photos taken of people as they are booked into jail, alleges the ...



Reviews: 15

NBC Chicago
https://www.nbcchicago.com/news/local/heres-a-look...

Here's a Look at Settlements Stemming From Illinois ... - NBC ...

- Facebook
- Google
- Tiktok
- Snapchat

Earlier this year, more than one million Illinois Facebook users began receiving checks following a \$650 million **settlement** in a class-action suit alleging it violated residents' rights by collecting and storing digital scans of their faces without permission. Distribution of \$397 payments began May 9. Facebook users in Illinois...
[See more on nbcchicago.com](#)



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51 out of a total of 182 lawsuits alleged BIPA violations due to the collection, disclosure, and/or dissemination of individuals' facial geometry or facial biometric information. 35 of these 51 cases were against smartphone applications (e.g. ...



UIC Law Review
https://lawreview.law.uic.edu/news-stories/did-you...

Did You Receive a Settlement Check in the Mail Too? – A Look at ...

Oct 31, 2022 - Recently, millions of settlement checks have been disbursed to Illinois residents, a result of biometric privacy class action lawsuits. Large social media and tech companies like ...

People also ask

FILED DATE: 8/12/2025 9:28 PM 2024L010142

Attachment 8

If you are or were an Illinois resident or were present in Illinois and your photo was taken or used by law enforcement, you may be eligible for payment from a class action settlement

NEWS PROVIDED BY

Circuit Court of Cook County, Illinois, Chancery Division →

May 27, 2025, 18:00 ET

CHICAGO, May 27, 2025 /PRNewswire/ --

This notice is to inform you that a proposed settlement has been reached in a class action lawsuit relating to facial recognition technology provided to law enforcement and used to search galleries of booking photos. The lawsuit alleges that Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC violated an Illinois law called the Illinois Biometric Information Privacy Act ("BIPA") by allegedly collecting, storing, using, and disclosing individuals' biometric data in connection with providing the FaceSearch technology and access to a booking photo gallery to law enforcement customers, allegedly without complying with the law's requirements. The case is *Simmons v. Motorola Solutions, Inc.*, Case No. 2024-L-010142, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division. The proposed Settlement is not an admission of wrongdoing by Defendants. Defendants deny that they violated the law. The Court has not decided who is right or wrong.

Am I a Part of the Settlement? You may be a Settlement Class member if your face appeared in images processed by the FaceSearch technology at any point in time up to April 9, 2025 and you: (a) are or were an Illinois resident; or (b) were present in Illinois at the time the image(s) was taken or processed.

What this means is that if you are or were an Illinois resident or were present in Illinois **and** your photo was taken or used by law enforcement, you may be part of the Settlement.

If so, you are eligible to submit a claim to receive cash benefits from this Settlement. More information about this Settlement is available online in the detailed web notice at www.simmonsBIPAsettlement.com.

What Does The Settlement Provide? If you're eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The amount of such payment is estimated to be approximately \$200-\$550, but could be more or less depending on the number of valid claims submitted. This amount would be an equal share of a \$47,500,000 fund that Defendants have agreed to create, after the payment of settlement expenses, attorneys' fees, and any incentive awards in the litigation approved by the Court.

How Do I Get My Payment? Visit the Settlement Website, www.simmonsBIPAsettlement.com, and submit a Claim Form online. You can also call 1-855-688-8844 to request a paper copy of the Claim Form. **All Claim Forms must be postmarked or submitted online by July 29, 2025.**

What are My Options? You can do nothing, comment on or object to any of the settlement terms, or exclude yourself from the settlement. If you do nothing, you won't be able to sue Motorola Solutions or Vigilant or certain related companies and individuals in a future lawsuit about the claims addressed in the settlement. If you exclude yourself, you won't get a payment but you'll keep your right to sue Motorola Solutions and Vigilant on the issues the settlement concerns. You must contact the settlement administrator by mail or e-mail to exclude yourself. You can also object to the settlement if you disagree with any of its terms. **All Requests for Exclusion and Objections must be received by July 8, 2025.**

Do I Have a Lawyer? Yes. The Court has appointed lawyers from the law firm Loevy & Loevy as "Class Counsel." They represent you and other settlement class members. The lawyers will request to be paid from the total amount that Defendants paid into the Fund. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees. The Court has also chosen Irene Simmons and Rodell Sanders—class members like you—to represent the Settlement Class.

When Will the Court Approve the Settlement? The Court will hold a final approval hearing on August 20, 2025 at 9:30 a.m. before the Honorable Joel Chupack in Room 2601 at the Richard J. Daley Center, 219 S. Dearborn Street, Chicago, Illinois 60604. The Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to 34% of the settlement fund and incentive awards of \$7,500. Class Counsel's request will be available on the Settlement Website.

Where Can I Get More Information? This notice is only a summary. For more information, visit:

www.simmonsBIPAsettlement.com

URL: www.simmonsBIPAsettlement.com

SOURCE Circuit Court of Cook County, Illinois, Chancery Division

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Attachment 9

7-25-25

To: Simmons BIPA Settlement
Class Action Administrator

My name is [REDACTED] inmate # [REDACTED]

I just received the form to the paper work 7-24-25
giving more detail about this settlement.

I see I can object to the pay-out, and
I want to chose that option. I lawyers
dont suppose to get more than me I am
the victim he suppose to get a small
percentage of the law suit from each person.

The attorney's face wasn't used so yes I
object to the pay out. I would like more
than \$550 anytime my image was used by
the defendant's, because they violated me
not Leery & Leery. Thank you for accepting
this letter & understanding my point of view

Sincerely
[REDACTED]

SAINT LOUIS MO 63103
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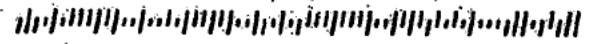


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Simmons BIPA Settlement
Class Action Administrator
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