Bond Case Briefs

Municipal Finance Law Since 1971

EMPLOYMENT - ILLINOIS

Yates v. City of Chicago, Illinois

United States Court of Appeals, Seventh Circuit - January 25, 2023 - F.4th - 2023 WL 382348

Aviation security officers brought action against city and state officials alleging that city's decision to end their classification as law enforcement personnel violated Due Process Clause.

The United States District Court dismissed claims against officials and entered summary judgment in city's favor. Officers appealed.

The Court of Appeals held that:

- City's decision to end officers' classification as law enforcement personnel did not violate Due Process Clause, and
- City was not promissorily estopped from ending officers' classification as law enforcement personnel.

City's decision to end aviation security officers' classification as law enforcement personnel did not violate Due Process Clause, even if city ordinance granting them law enforcement status gave them cognizable property interest in their classification; state denied ordinance's validity under state law, through their union, all aviation security officers received hearing on question whether they were law enforcement officers, and Illinois Labor Relations Board ruled against them, and officers did not claim that union had breached its duty of fair representation.

Under Illinois law, city was not promissorily estopped from ending aviation security officers' classification as law enforcement personnel; officers' collective bargaining agreement (CBA) with city did not promise that aviation security officers would remain law enforcement officials, CBA contained zipper clause saying that parties could not rely on anything that was not written into agreement, and city's field manual that set out aviation security officers' rights and duties expressly reserved city's right to make changes.

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com