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Via electronic mail

October 9, 2026

Mitch Pugh
Executive Editor
Chicago Tribune
mpugh@chicagotribune.com

Re: The Tribune's Willful Misleading of the Public in the Race for Board of Education President

Dear Mr. Pugh:

I represent Hilario F. Dominguez in connection with the false and defamatory statements the Chicago Tribune has published about him in the articles referenced in this letter.[1] I write to expose the fact that the Tribune's editorial staff is knowingly publishing defamatory statements of third parties and intentionally omitting contextual information that make the false nature of those statements obvious. Mr. Dominguez believes in open discussion of matters of public concern and asks the Tribune to 1) take responsibility for denying the public relevant facts in this case and 2) take prompt and effective action to remedy these errors.

The Tribune's Editorial Board has endorsed another candidate for President of the Chicago School Board. Having apparently determined that the candidates' respective qualifications do not sufficiently substantiate its endorsement, the Tribune has resorted to dredging up false accusations of inappropriate conduct from the daughter of a former political opponent of Mr. Dominguez. These articles are harmful not only because they rely on transparent fabrications to harm the reputation of the candidate for Board of Education President best placed to advocate for our children, but because they undermine the ability of actual victims of sexual harassment to be taken seriously.

The following facts are in the public record and were either sent directly to the Tribune or would have been discovered by the Tribune as part of its routine due diligence prior to its publication of tabloid-style articles platforming defamatory allegations against Mr. Dominguez:

- The false accusations against Mr. Dominguez arose from the campaign of Mr. Dominguez's opponent in the 25th Ward Aldermanic Election in 2019, Aida Flores. The alleged victim is

[1] See https://www.chicagotribune.com/2026/10/02/cps-watchdog-school-board-president-candidate/; https://www.chicagotribune.com/2026/10/06/school-board-candidates-contenders-conduct/; and https://www.chicagotribune.com/2026/10/07/brandon-johnson-hilario-dominguez-school-board/

her daughter. The Tribune's own *Chicago Now* reported in February of 2019 that the allegations were made or repeated by Ms. Flores herself.[2] The allegations suddenly materialized when Ms. Flores stood to benefit from them during the election. One would think that the Tribune would consider such a glaring conflict of interest worthy of mention, but it did not.

- It was alleged that in 2017, Mr. Dominguez had an interaction with Ms. Flores's daughter that made her uncomfortable. In 2017 the accuser was 17 years old, yet Ms. Flores apparently did not report any misconduct, despite being a mother, an Assistant Principal with CPS at the time, and a "mandated reporter" of child abuse under both CPS policy and the Abused and Neglected Child Reporting Act, 325 ILCS 5/4.

- Once the smear no longer benefited Ms. Flores, and when she wanted his support for her 2022-23 aldermanic campaign, her campaign representative Rebecca Williams sent friendly text messages attempting to facilitate a meeting between Mr. Dominguez and Ms. Flores's daughter, acknowledging awareness that the allegations were false, and attempting to scapegoat Ald. Byron Sigcho-Lopez (her then-opponent in the 25th Ward election) and his wife for the allegations. These texts are in the public record.[3]

- The allegations have now surfaced again, nine years after the last time Mr. Dominguez worked with the accuser and just weeks before the election in which Mr. Dominguez is polling as the front-runner for President of the Chicago School Board. And there is public and documentary evidence that Ms. Flores's daughter, Mr. Dominguez's accuser who in 2026 asked the Office of the Inspector General (OIG) to reopen the investigation, proposed in 2022 that she and Mr. Dominguez meet to discuss the matter *alone* – "just myself and you."[4]

- In the October 6, 2026 article, the Tribune reports the claims of the accuser, Ms. Flores's daughter, that the CPS OIG "tried to call her parents in 2022 and had sent her a direct message to an Instagram account they believed belonged to her, but she alleged she had no knowledge of those attempts." Ms. Flores, however, as a CPS Assistant Principal, was identifiable, reachable, would be familiar with an OIG investigation, and was required by law to respond to the OIG inquiry. CPS Board Rule 4-4.m and CPS Policy Manual 511.1 and State law (105 ILCS 5/34-13.1) require all CPS employees to cooperate with the Board OIG in its investigations and inquiries.

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[2] See https://web.archive.org/web/20190226104621/https:/www.chicagonow.com/el-arco-press/2019/02/solis-insider-reveals-who-alderman-supports-cites-allegations-of-sexual-misconduct-against-a-candidate/; and https://www.facebook.com/share/p/1FC9L9CD88/?mibextid=wwXIfr

[3] https://drive.proton.me/urls/74ZV5TSC9R#F4e6ZUO918rz

[4] https://x.com/tahmanbradley/status/2107608088425689252?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E2107608088425689252%7Ctwgr%5E%7Ctwcon%5Es1_&ref_url=

- These accusations have been investigated by each of Mr. Dominguez's employers and determined to be unfounded. Yet, the Tribune published statements insinuating that two staff members at the Resurrection Project thought there was merit to the allegations, but omitted statements in the Tribune's possession indicating the opposite. In fact, the Tribune obtained a statement from Mr. Dominguez's direct supervisor at the time of the alleged misconduct that undermined any such claim. Sal Cerna served as Mr. Dominguez's direct supervisor at the Resurrection Project. He told the Tribune: "Hilario was a terrific organizer for The Resurrection Project and we were sad to see him leave. Any statement that I had to discipline Hilario or had to discuss as a result of his interactions with youth is false."

In another remarkable non-coincidence, Illinois election records show that Ms. Flores's campaign has received more than $160,000 in contributions from the Get Stuff Done PAC, whose primary financial backer is oligarch and public school opponent Michael Sacks.[5] Mr. Sacks is also the primary funder of the super PAC for the Common Ground Collective, which has spent over $2 million opposing CTU-endorsed school board candidates, including Mr. Dominguez. Since June of 2026 the super PAC has collected $3.5 million in donations, "[n]early all [...] from billionaire Michael Sacks."[6] By omitting the fact that the accuser is the daughter of Mr. Dominguez's previous aldermanic election opponent *and* the recipient of large campaign contributions from the chief funder of efforts to oppose his current candidacy for school board president, the Tribune is willfully misleading the public about the nature of the accusations against him and who stands to gain from these smears.

By amplifying false, misleading, and defamatory statements while omitting material facts, the newspaper has failed in its responsibility to ensure that voters are accurately informed ahead of the election. Mr. Dominguez is a community organizer, a gifted teacher who inspired his students to accomplish their goals, and was the deputy political director for the Chicago Teachers Union. The evidence is clear that the accusations against him were fabricated for political purposes in 2019 and are being resurrected for political purposes in 2026. The Tribune's failure to even mention any of this evidence is irresponsible and stems from the same illegitimate political motives highlighted in this letter.

We request that the Tribune:

1. Publish this letter in its entirety.

2. Include links to this letter in the articles the Tribune has published on this topic.

3. Preserve all documents, communications, and electronically stored information relating to Mr. Dominguez and to the statements identified above, including drafts, messages, and social media data, as these materials may be relevant to potential litigation.

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[5] https://news.wttw.com/2023/02/20/political-funds-backed-business-leaders-challenge-push-progressives-expand-power-city

[6] https://www.chalkbeat.org/chicago/2026/10/05/super-pacs-ramp-up-spending-in-2026-school-board-election/

Sincerely,

/s/ Rima Kapitan

Counsel for Hilario Dominguez, Candidate
for President of the Chicago School Board