

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 23-
)	(Enforcement – Air)
FILMQUEST GROUP, INC.,)	
an Illinois corporation,)	
)	
Respondent.)	

NOTICE OF FILING

To: Persons on Attached Service List
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the Complaint, Stipulation and Proposal for Settlement, and Motion for Relief from Hearing Requirement, true and correct copies of which are attached hereto and hereby served upon you.

BY: /s/ Nancy J. Tikalsky
NANCY J. TIKALSKY
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General’s Office
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(872) 272-0776
Primary e-mail: nancy.tikalsky@ilag.gov
Secondary e-mail: maria.cacaccio@ilag.gov

Dated: January 11, 2023

SERVICE LIST

Stephanie B. Sebor
Defense counsel
Winston & Strawn LLP
35 West Wacker Drive
Chicago, Illinois 60601-9703
312-558-7341
SSebor@winston.com

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served on the 11th day of January 2023 the attached Notice of Filing, Complaint, Stipulation and Proposal for Settlement, and Motion for Relief from Hearing Requirement upon the persons listed on the foregoing Service List via electronic mail.

BY: /s/ Nancy J. Tikalsky
NANCY J. TIKALSKY, AAG
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(872) 272-0776
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COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, complains of Respondent, FILMQUEST GROUP, INC., an Illinois corporation, as follows:

COUNT I

1. This Count is brought on behalf of Complainant, the PEOPLE OF THE STATE OF ILLINOIS, by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), against FILMQUEST GROUP, INC., an Illinois corporation (“Filmquest”), pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2020).

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2020), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to Complaint, Filmquest was and is an Illinois corporation in good standing.

4. Since 2007, on a date best known to Filmquest, Filmquest has operated and continues to operate a flexible packaging manufacturing facility located at 320 Remington Boulevard, Bolingbrook, Will County, Illinois 60440 (“Facility”). Filmquest operations convert, coat, and metallize all grades of polyethylene terephthalate (PET) film for use in the flexible packaging, industrial, and other markets. The facility supplies PET films in master rolls, slit-to-width rolls, cut sheets, and fabricated components.

5. Since 2007, on a date best known to Filmquest, Filmquest operated and continues to operate emission units at the Facility consisting of seven (7) slitters, one (1) rotogravure printing press, a natural gas-fired dryer, and a parts washer.

6. Based on information submitted by Filmquest to Illinois EPA, Filmquest operations include water-based coatings to one or both sides of the film as well as solvent-based coatings, which typically account for less than two percent of the total coatings applied in a year. Accordingly, Filmquest states its operations have a potential to emit (“PTE”) at least 50 tons per year (“tpy”) of Volatile Organic Material (“VOM”).

7. On June 9, 2022, the Illinois EPA issued to Filmquest a Federally Enforceable State Operating Permit for its emissions units at the Facility.

8. Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b), provides as follows:

After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the Agency.

9. Section 39.5(5) of the Act, 415 ILCS 5/39.5(5) (2020), provides, in pertinent part, as follows:

Applications and Completeness.

* * *

a. An owner or operator of a CAAPP source shall submit its complete CAAPP application consistent with the Act and applicable regulations.

* * *

x. The owner or operator of a new CAAPP source shall submit its complete CAAPP application consistent with this subsection within 12 months after commencing operation of such source. The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

10. Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2020), provides, in pertinent part, as follows:

Applicability

a. Sources subject to this Section shall include:

i. Any major source as defined in paragraph (c) of this subsection.

* * *

c. For purposes of this Section the term "major source" means any source that is:

* * *

iii. A major stationary source as defined in part D of Title I of the Clean Air Act including:

A. For ozone nonattainment areas, sources with the potential to emit 100 tons or more per year of volatile organic compounds or oxides of nitrogen in areas classified as "marginal" or "moderate", 50 tons or more per year in areas classified as "serious", 25 tons or more per year in areas classified as "severe", and 10 tons or more per year in areas classified as "extreme";

* * *

11. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2020), provides, in pertinent part, the following definitions:

“CAAPP” means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.

“CAAPP PERMIT”... means, in pertinent part, any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.

"CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

“OWNER OR OPERATOR” means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

“SOURCE” means, in pertinent part, any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

“STATIONARY SOURCE” means, in pertinent part, any building, structure, facility, or installation that emits or may emit any regulated air pollutant

“REGULATED AIR POLLUTANT” means, in pertinent part, as follows:

* * *

1. . . . any volatile organic compound.

12. Section 3.315 of the Act, 415 ILCS 5/3.315 (2020), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

13. Filmquest, a corporation, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2020).

14. VOM is a “regulated air pollutant” as that term is defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2020).

15. From 2007, on a date best known to Filmquest, to the present, the Facility had and has the capacity to emit greater than 50 tpy of VOM, and therefore, was and is a “stationary source” a “source” and a “CAAPP source” as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2020).

16. In 2007, on a date best known to Filmquest, the Facility was located in a “serious” ozone non-attainment area, and therefore was and is a “major source” as that term is defined in Section 39.5(2)(c)(iii)(A) of the Act, 415 ILCS 5/39.5(2)(c)(iii)(A) (2020).

17. Filmquest is an “owner or operator” that must obtain a “CAAPP permit” as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2020).

18. By failing to submit an application to the Illinois EPA for a CAAPP permit or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in operation at the Facility, Filmquest violated Section 39.5(5)(a)(x) of the Act, 415 ILCS 5/39.5(5)(a)(x) (2020).

19. By operating the Facility, a major source, without timely submitting an application before commencing operation as a major source, Filmquest violated Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2020).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against the Respondent, FILMQUEST GROUP, INC.:

1. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;
2. Finding that Respondent has violated Section 39.5(5)(a)(x) of the Act, 415 ILCS 5/39.5(5)(a)(x) (2020), and Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2020);
3. Ordering the Respondent to cease and desist from any further violations of Section 39.5(5)(a)(x) of the Act, 415 ILCS 5/39.5(5)(a)(x) (2020), and Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2020);
4. Assessing against Respondent pursuant to Section 42(b)(5) of the Act, 415 ILCS 5/42(b)(5) (2020), a civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation Section 39.5(5)(a)(x) of the Act, 415 ILCS 5/39.5(5)(a)(x) (2020), and Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2020);
5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Respondent; and

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6. Granting such other relief as the Board deems appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
by KWAME RAOUL
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: */s/ Stephen J. Sylvester*
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

OF COUNSEL:
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MOTION FOR RELIEF FROM HEARING REQUIREMENT

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and pursuant to Section 31(c)(2) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(c)(2) (2020), moves that the Illinois Pollution Control Board (“Board”) grant the parties in the above-captioned matter relief from the hearing requirement imposed by Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2020). In support of this motion, Complainant states as follows:

1. The Complaint in this matter alleges violations of 415 ILCS 5/39.5(6)(b) (2020).
2. Complainant is filing the Complaint with the Board simultaneous with this Motion and a Stipulation and Proposal for Settlement.
3. The parties have reached agreement on all outstanding issues in this matter.
4. This agreement is presented to the Board in a Stipulation and Proposal for Settlement filed this same date.

5. All parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such a hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2020).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2020).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

KWAME RAOUL
Attorney General
State of Illinois

BY: /s/ Nancy J. Tikalsky

NANCY J. TIKALSKY
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(872) 272-0776
Primary e-mail: nancy.tikalsky@ilag.gov
Secondary e-mail: maria.cacaccio@ilag.gov

Dated: January 11, 2023

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STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and FILMQUEST GROUP, INC., (“Respondent”) (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2020), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

I. STATEMENT OF FACTS

A. Parties

1. On January 11, 2023, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon

the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2020), against Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2020).

3. At all times relevant to the Complaint, Respondent has been and is an Illinois corporation in good standing with the Illinois Secretary of State.

4. At all times relevant to the Complaint, Respondent owned and operated a flexible packaging manufacturing facility located at 320 Remington Boulevard, Bolingbrook, Will County, Illinois ("Facility").

B. Allegations of Non-Compliance

Complainant contends that Respondent has violated the following provisions of the Act and Board Air Pollution Regulations:

Count I: Failure to timely submit an application to the Illinois EPA for a air pollution permit for a major source, in violation of 415 ILCS 5/39.5(6)(b) (2020).

C. Non-Admission of Violations

Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section I.B herein, and this Stipulation shall not be interpreted as including such admission.

D. Compliance Activities to Date

On September 9, 2021, Respondent submitted to the Illinois EPA a Voluntary Self-Disclosure, a Federally Enforceable State Operating Permit (“FESOP”) application, Annual Emission Reports (“AER”) for calendar years 2015 through 2020, and avoided air pollution site fees for the period 1997 through 2021.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against Respondent in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2020).

III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2020), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;

4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. Complainant contends that human health and the environment were threatened by Respondent's violations.
 2. There is social and economic benefit to the Facility.
 3. Operation of the Facility was and is suitable for the area in which it is located.
 4. Timely submission of an air pollution permit application to the Illinois EPA, is both technically practicable and economically reasonable.
 5. Respondent has subsequently complied with the Act and the Board Regulations.

IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2020), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;

5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a 'supplemental environmental project,' which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Respondent failed to timely submit to the Illinois EPA an application for an air pollution permit for a major source. The violations began on or about 2007, and were resolved by Respondent submitting an application for a FESOP to the Illinois EPA on September 9, 2021.
2. Respondent was diligent in attempting to come back into compliance with the Act and Board Regulations when it discovered on its own of its noncompliance.
3. Respondent accrued an economic benefit as a result of avoided or delayed compliance, in that it delayed payment of permit fees and the cost to complete required reports to IEPA.
4. Complainant has determined, based upon the specific facts of this matter, including substantial self-disclosure of violations, that a penalty of Five Thousand Dollars (\$5,000.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board Regulations.
5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.

6. Respondent met substantial self-disclosure in this matter resulting in a substantial discount in its civil penalty.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter

V. TERMS OF SETTLEMENT

A. Penalty Payment

Respondent shall pay a civil penalty in the sum of Five Thousand Dollars (\$5,000.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Interest and Default

1. If Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, Respondent shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by Respondent not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

C. Payment Procedures

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
nancy.tikalsky@ilag.gov

D. Future Compliance

1. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon Respondent's Facility which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

2. This Stipulation in no way affects the responsibilities of Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

3. Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

E. Release from Liability

In consideration of Respondent's payment of the \$5,000.00 penalty, its commitment to cease and desist as contained in Section V.D.3 above and upon the Board's approval of this Stipulation, Complainant releases, waives and discharges Respondent from any further liability or penalties for the violations of the Act and Board Regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on January 11, 2023. Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than Respondent.

F. Enforcement of Stipulation

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

G. Execution of Stipulation

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

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WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.


PEOPLE OF THE STATE OF ILLINOIS

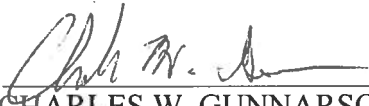
ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

KWAME RAOUL
Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

JOHN J. KIM, Director
Illinois Environmental Protection Agency

BY: 
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

BY: 
CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: 1/6/23

DATE: 1/6/23

FILMQUEST GROUP, INC.

BY: _____

ITS: _____

DATE: _____

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

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JOHN J. KIM, Director
Illinois Environmental Protection Agency

BY: _____
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

BY: _____
CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: _____

DATE: _____

FILMQUEST GROUP, INC.

BY: 
Eric Zimmerman

ITS: Chief Operating Officer

DATE: 1/5/2023