

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
)	
Complainant,)	
)	
v.)	PCB No. 24-16
)	(Enforcement - Air)
NASSER YAFAI, an individual, QUICK GAS)	
& MINI MART, INC., a dissolved Illinois)	
corporation, CYPR Harvey, Inc. d/b/a)	
QUICK GAS & MINI MART, INC., an Illinois)	
corporation, and HARVEY REAL ESTATE, INC.,)	
an Illinois corporation,)	
)	
Respondents.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have today caused to be filed with the Clerk of the Illinois Pollution Control Board by electronic filing the following Motion to Deem Facts Admitted and for Summary Judgement against Harvey Real Estate, Inc., on behalf of the People of the State of Illinois, a true and correct copy of which is attached hereto and hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. KWAME RAOUL, Attorney General of the
State of Illinois

BY: /s/ Cara V. Sawyer
CARA V. SAWYER
Assistant Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-3094
(773) 758-4583
Primary email: cara.sawyer@ilag.gov
Secondary email: maria.cacaccio@ilag.gov

Date: December 6, 2023

Service List

Brad Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren, Suite 630
Chicago, IL 60605
Brad.Halloran@illinois.gov
(Via Email)

John Mraibie
Counsel for Respondents Naser Yafai and Quick Gas & Mini Mart, Inc.
Mraibie & Associates
14612 John Humphrey Dr.
Orland Park, IL 60462
Info@mraibelaw.com
(Via Email)

Cyriac K. Chandy, Reg'd Agent
CYPR Harvey Inc.
960 Rand Rd., Suite 208
Des Plaines, IL 60016
(Via U.S. Mail)

CYPR Harvey Inc.
15355 S. Dixie Hwy
Harvey, IL 60426
(Via U.S. Mail)

Cyriac K. Chandy, Reg'd Agent
Harvey Real Estate Inc.
960 Rand Rd., Suite 208
Des Plaines, IL 60016
(Via U.S. Mail)

Harvey Real Estate Inc.
15355 S. Dixie Hwy
Harvey, IL 60426
(Via U.S. Mail)

CERTIFICATE OF SERVICE

I, CARA V. SAWYER, an attorney, do certify that I caused Complainant's Motion to Deem Facts Admitted and for Summary Judgment against Harvey Real Estate, Inc., and Notice of Filing, to be served this 6th day of December, 2023, upon the parties named in the attached Service List by the methods listed therein.

/s/ Cara V. Sawyer
CARA V. SAWYER
Assistant Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-3094
(773) 758-4583
Primary email: cara.sawyer@ilag.gov
Secondary email: maria.cacaccio@ilag.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
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Complainant,)	
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v.)	PCB No. 24-016
)	(Enforcement - Air)
NASSER YAFAI, an individual, QUICK GAS)	
& MINI MART, INC., a dissolved Illinois)	
corporation, CYPR Harvey, Inc., an Illinois)	
corporation, d/b/a QUICK GAS & MINI MART,)	
INC., and HARVEY REAL ESTATE, INC.,)	
an Illinois corporation,)	
)	
Respondents.)	

**MOTION TO DEEM FACTS ADMITTED AND FOR SUMMARY JUDGMENT
AGAINST RESPONDENT HARVEY REAL ESTATE, INC.**

Now comes Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, pursuant to Sections 103.204 and 101.516 of the Illinois Pollution Control Board’s Procedural Rules (“Board Procedural Rules”), 35 Ill. Adm. Code 103.204 and 101.516, and hereby moves for the entry of an order deeming all material facts in Complainant’s Complaint as admitted against Respondent HARVEY REAL ESTATE, INC. (“Harvey Real Estate”) as to Count I of the Complaint. Further, Complainant moves this Illinois Pollution Control Board (“Board”) for summary judgment as to Count I of the Complaint against Harvey Real Estate. In support thereof, Complainant states as follows:

1. On August 30, 2023, Complainant filed its Complaint against Harvey Real Estate (“Respondent”) and others for alleged violations that occurred at its gasoline dispensing facility located at 15355 Dixie Highway Harvey, Cook County, Illinois (the “Facility”). Complainant alleged that Respondent failed to timely decommission its vapor collection and control system

and submit reports, in violation of Section 9(a) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/9(a) (2022), and Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C).

2. On October 2, 2023, Complainant filed its Proof of Service of the August 30, 2023 Complaint with the Board.

3. The Proof of Service indicated that Respondent had been served with the Complaint by personal service on its Registered Agent on September 19, 2023. A true and correct copy of the Proof of Service and related Affidavit is attached hereto as Exhibit 1.

4. As of the date of the filing of this Motion, Respondent has not filed an Answer, nor otherwise pled, to the Complaint.

5. Sections 103.204(d) and (e) of the Board Procedural Rules, 35 Ill. Adm. Code 103.204(d) and (e), provide as follows:

- (d) Except as provided in subsection (e), the respondent must file an answer within 60 days after receipt of the complaint if respondent wants to deny any allegations in the complaint. All material allegations of the complaint will be taken as admitted if no answer is filed or if not specifically denied by the answer, unless respondent asserts a lack of knowledge sufficient to form a belief. Any facts constituting an affirmative defense must be plainly set forth before hearing in the answer or in a supplemental answer, unless the affirmative defense could not have been known before hearing.
- (e) If the respondent timely files a motion under Section 103.212(b) or 35 Ill. Adm. Code 101.506, the 60-day period to file an answer described in subsection (d) will be stayed. The stay will begin when the motion is filed and end when the Board disposes of the motion.

6. By failing to answer the Complaint on or before November 18, 2023, and failing to file a motion staying the 60-day period in which to file an Answer, as required by Sections

103.204(d) and (e) of the Board Procedural Rules, 35 Ill. Adm. Code 103.204(d) and (e), Respondent has admitted the material allegations asserted in the Complaint.

7. Complainant therefore requests that the Board enter an order finding that pursuant to Sections 103.204(d) and (e) of the Board Procedural Rules, 35 Ill. Adm. Code 103.204(d) and (e), Respondent has admitted all material allegations asserted in the Complaint.

8. Complainant's Complaint sufficiently states facts establishing the following violations of the Act and Board Air Pollution Regulations against Respondent:

Count I: Failure to Timely Decommission Vapor Collection and Control System and Submit Reports: Section 9(a) of the Act, 415 ILCS 5/9(a) (2020), and Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C).

9. Section 101.516(b) of the Board Procedural Rules, 35 Ill. Adm. Code 101.516(b), provides as follows:

(b) If the record, including pleadings, depositions and admissions on file, together with any affidavits, shows that there is no genuine issue of material fact, and that the moving party is entitled to judgment as a matter of law, the Board will enter summary judgment.

10. If the Board finds that Respondent has admitted all material allegations in Complainant's Complaint, then the record shows that there is no issue of material fact remaining for review. Therefore, pursuant to Section 101.516(b) of the Board Procedural Rules, 35 Ill. Adm. Code 101.516(b), Complainant is entitled to summary judgment in its favor as a matter of law.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, respectfully requests that that Board issue an

order in favor of Complainant and against Respondent HARVEY REAL ESTATE, INC., as follows:

- A. Finding all material allegations in the Complaint admitted against Respondent;
- B. Finding that Respondent violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2022), and Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C);
- C. Granting summary judgment in favor of Complainant and against Respondent on Count I of the Complaint;
- D. Requiring Respondent to decommission its vapor collection and control system and submit a decommissioning checklist, certification, and test results to the Illinois EPA within 60 days of the Board's order regarding this motion; and
- E. Assessing a civil penalty in the amount of at least Ten Thousand Dollars (\$10,000.00) against Respondent for its violation of the Act and Board Air Pollution Regulations.

COMPLAINANT'S ARGUMENT IN SUPPORT OF ITS PROPOSED REMEDY

The September 7, 2023 Board Order in this cause provides, in pertinent part:

Accordingly, the Board further directs the hearing officer to advise the parties that in summary judgment motions and responses, at hearing, and in briefs, each party should consider: (1) proposing a remedy for a violation, if any (including whether to impose a civil penalty), and supporting its position with facts and arguments that address any or all of the Section 33(c) factors; and (2) proposing a civil penalty, if any (including a specific total dollar amount and the portion of that amount attributable to the respondent's economic benefit, if any, from delayed compliance), and supporting its position with facts and arguments that address any or all of the Section 42(h) factors. ...

Pursuant to the September 7, 2023 Board Order, Complainant is proposing a remedy for Respondent's violations of Section 9(a) of the Act, 415 ILCS 5/9(a) (2022), and Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C).

Complainant therefore requests that Respondent be ordered to provide notice of decommissioning to Illinois EPA, decommission its vapor collection and control system, and submit a decommissioning checklist, certification, and test results to the Illinois EPA, pursuant to Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C). Additionally, the Board should assess a civil penalty against Respondent.

Impact on the Public Resulting from Respondent's Alleged Non-Compliance

In determining whether a civil penalty is warranted, the Board must consider the factors set forth in Section 33(c) of the Act, 415 ILCS 5/33(c). *Toyol Am., Inc. v. Illinois Pollution Control Board*, 2012 IL App (3d) 100585, ¶ 28 (3d Dist. 2012). The factors provided in Section 33(c) bear on the reasonableness of the circumstances surrounding the violation. *People v. John Prior d/b/a Prior Oil Co. and James Mezo d/b/a Mezo Oil Co.*, (PCB 02-177), Slip Op. at 29 (May 6, 2004).

Section 33(c) of the Act, 415 ILCS 5/33(c) (2022), 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, Complainant states the following:

1. Human health and the environment were threatened by emissions of volatile organic compounds at the Facility caused by Respondent's violations. Additionally, the Illinois EPA's information gathering responsibilities were hindered 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 decommissioning of its vapor collection and control system, and timely submission of a decommissioning checklist, certification, and test results to the Illinois EPA, are both technically practicable and economically reasonable.

5. Respondent has not subsequently complied with the Act and the Board Air Pollution Regulations.

In consideration of these factors, the Board should enter an order requiring Respondent to provide notice of decommissioning to Illinois EPA, decommission its vapor collection and control system, and submit a decommissioning checklist, certification, and test results to the Illinois EPA within 60 days of the Board's order regarding this motion. Additionally, the Board should assess a civil penalty in the amount of at least Ten Thousand Dollars (\$10,000.00) against Respondent for its violation of the Act and Board Air Pollution Regulations.

Explanation of Civil Penalty Requested

Section 2(b) of the Act, 415 ILCS 5/2(b) (2022), provides:

It is the purpose of this Act, as more specifically described in later sections, to establish a unified, state-wide program supplemented by private remedies, to restore, protect and enhance the quality of the environment, *and to assure that adverse effects upon the environment are fully considered and borne by those who cause them.* (Emphasis added.)

The primary purpose of civil penalties is to aid in the enforcement of the Act. *See People v. McHenry Shores Water Co.*, 295 Ill. App. 3d 628, 638 (2d Dist. 1998). Civil penalties should reflect the severity of the violation(s) of the Act. *Southern Illinois Asphalt Company, Inc. v. Pollution Control Board*, 60 Ill. App. 2d 204, 208 (5th Dist. 1975). However, the Act authorizes civil penalties regardless of whether violations resulted in actual pollution. *ESG Watts, Inc. v. Illinois Pollution Control Board*, 282 Ill. App. 3d 43, 52 (4th Dist. 1996). Moreover, the award of a civil penalty “serves the legislative purpose of aiding enforcement of the Act, for through penalties upon those who blatantly disregard applicable rules and regulations, others, who might consider cutting corners at the expense of the environment, are deterred.” *Wasteland, Inc. v. Illinois Pollution Control Board*, 118 Ill. App. 3d 1041, 1055 (3d Dist. 1983) (subsequently cited by the First District; *see, e.g., Standard Scrap Metal Co. v. Pollution Control Board*, 142 Ill. App. 3d 655, 665 (1st Dist. 1986)).

Section 42 of the Act provides guidance for calculating civil penalties for violations of the Act. In particular, Section 42(a) of the Act, 415 ILCS 5/42(a) (2022), provides in pertinent part, as follows:

- (a) Except as provided in this Section, any person that violates any provision of this Act or any regulation adopted by the Board, or any permit or term or condition thereof, or that violates any order of the Board pursuant to this Act, shall be liable for a civil penalty of not to exceed \$50,000 for the

violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues;

Consideration of Section 42(h) Factors

Section 42(h) of the Act, 415 ILCS 5/42(h) (2022), provides as follows:

In determining the appropriate civil penalty to be imposed..., 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, Complainant states as follows:

1. Respondent failed to timely decommission its vapor collection and control system on or after the date they acquired the Facility, and have also failed to submit a decommissioning checklist, certification, and test results to the Illinois EPA. The violations began on approximately September 27, 2018 and have continued through the date of filing of this motion. Respondent has been violating the Act and Board Air Pollution Regulations for over five years.

2. The question of good faith, or the lack thereof, is pertinent to a determination of sanctions. *See Wasteland, Inc.*, 118 Ill. App. 3d at 1054. Here, Respondent failed to act diligently in this matter, as evidenced by its failure to timely decommission its vapor collection and control system and submit a decommissioning checklist, certification, and test results to the Illinois EPA. As a result, Respondent caused, threatened or allowed the discharge or emission of volatile organic compounds, which are contaminants, into the environment.

3. The Ten Thousand Dollars (\$10,000.00) civil penalty requested by Complainant includes any economic benefit that Respondent may have accrued as a result of its noncompliance.

4. In the absence of a civil penalty sufficient to deter other persons similarly situated under the Act, no regulated entity “would ever be inclined to comply with Illinois’ environmental requirements.” *Standard Scrap Metal Co.*, 142 Ill. App. 3d at 664. Accordingly, a significant civil penalty is warranted. As such, a civil penalty in the amount of at least Ten Thousand Dollars (\$10,000.00) will serve to deter further violations by Respondent and to otherwise aid in enhancing voluntary compliance with the Act and Board Air Pollution Regulations by Respondent and other persons similarly subject to the Act and Board Air Pollution Regulations.

5. To Complainant's knowledge, Respondent has had no previously adjudicated violations.

6. Self-disclosure is not at issue in this matter.

7. Respondent did not offer to perform a supplemental environmental project.

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

In furtherance of the purposes of the Act "to assure that adverse effects upon the environment are fully considered and borne by those who cause them," 415 ILCS 5/2(b) (2022), and based on the duration of the violations and Respondent's lack of diligence to comply with Section 9(a) of the Act, 415 ILCS 5/9(a) (2022), and Sections 218.586(i)(1)(B) and 218.586(i)(2)(C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.586(i)(1)(B) and 218.586(i)(2)(C), the Board should assess against Respondent a civil penalty of no less than Ten Thousand Dollars (\$10,000.00).

Based on the facts of this case and consideration of Section 42(h) of the Act, 415 ILCS 5/42(h), the Board should assess Respondent a civil penalty in the amount of at least Ten Thousand Dollars (\$10,000.00).

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WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, respectfully requests that the Board grant its Motion to Deem Facts Admitted and for Summary Judgment against Respondent HARVEY REAL ESTATE, INC., and award the relief requested herein, and take such other action as the Board deems to be appropriate and just.

Respectfully submitted,

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

By: /s/ Cara V. Sawyer

Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
69 W. Washington St., Suite 1800
Chicago, Illinois 60602
Tel: (773) 758-4583
Primary: cara.sawyer@ilag.gov
Secondary: maria.cacaccio@ilag.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
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Complainant,)	
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v.)	PCB No. 24-016
)	(Enforcement - Air)
NASSER YAFAI, an individual, QUICK GAS)	
& MINI MART, INC., a dissolved Illinois)	
corporation, CYPR Harvey, Inc. d/b/a)	
QUICK GAS & MINI MART, INC., an Illinois)	
corporation, and HARVEY REAL ESTATE, INC.,)	
an Illinois corporation,)	
)	
Respondents.)	

CORRECTED NOTICE OF FILING

To: Persons on Attached Service List

PLEASE TAKE NOTICE that I have today caused to be filed with the Clerk of the Illinois Pollution Control Board by electronic filing the following Affidavits of Service of Complainant's Complaint upon Respondents Nasser Yafai, CYPR HARVEY, INC., d/b/a Quick Gas & Mini Mart, and Harvey Real Estate, Inc., true and correct copies of which are attached hereto and hereby served upon you.

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

By: /s/ Cara V. Sawyer
Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington St., 18th Floor
Chicago, Illinois 60602
(773) 758-4583
cara.sawyer@ilag.gov

Dated: September 25, 2023

Service List

Bradley Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, IL 60605
Brad.Halloran@illinois.gov
(Via Email)

Nasser Yafai
6129 N. Karlov Ave.
Chicago, IL 60646

Quick Gas & Mini Mart, Inc.
Khaled M. Saeed, President
10059 Merrimac Avenue
Oak Lawn, IL 60453

CYPR Harvey, Inc. dba Quick Gas and Mini Mart, Inc.
Cyriac K. Chandy, Registered Agent
960 Rand Rd., Suite 208
Des Plaines, IL 60016-2355

Harvey Real Estate, Inc.
Cyriac K. Chandy, Registered Agent
960 Rand Rd., Suite 208
Des Plaines, IL 60016-2355

CERTIFICATE OF SERVICE

I, Cara V. Sawyer, as Assistant Attorney General, do certify that on this 26th day of September 2023, I caused to be served a copy of the foregoing Corrected Notice of Filing and Affidavits of Service of Complainant's Complaint upon Respondents Nasser Yafai,. CYPR HARVEY, INC., d/b/a Quick Gas & Mini Mart, and Harvey Real Estate, Inc. upon the person listed on the attached Service List via U.S. Mail.

/s/ Cara V. Sawyer
Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
773) 758-4583
Cara.Sawyer@ilag.gov

STATE OF ILLINOIS

COUNTY OF Cook)SS.

CASE NUMBER: PCB 2024-016

AFFIDAVIT OF SERVICE

I, Mario Valenti, being first duly sworn, depose and state as follows:

I am an Investigator in the Office of the Attorney General, State of Illinois. Pursuant to 15 ILCS 205/4c investigators employed by the Attorney General have all the powers possessed by sheriffs.

I am over 21 years of age and not a party in this case.

I served the within Notice of Filing and Complaint and a copy of the attached N/A

Nasser Yafai (Quick Gas & Mini Mart, Inc.), on the 25th day of Sep, 2023 at approximately 8:50 am by:

PERSONAL service was made by giving a copy of the aforementioned Notice and Complaint to Nasser Yafai (Quick Gas & Mini Mart, Inc.) to Inc. asian, 70, male
Race Age Sex

personally at 6129 N Karlov Ave. in Chicago, Illinois Cook County, Illinois.

SUBSTITUTE service on _____ was made by handing the aforementioned _____ to _____, a member of the same household, (who is 13 years of age or older) _____, _____, _____
Race Age Sex

informing that person of the contents of the above cited document(s) on the _____ day of _____, 20____ at the hour of _____, at _____, in _____, County of _____, his/her usual place of residence and by placing the document(s) in the United States Mail on _____, with postage fully prepaid and addressed to the Respondent's last known address.

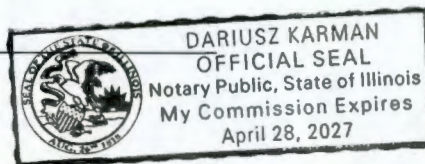
CORPORATION OR PARTNERSHIP service on _____ by leaving a copy of the _____ and of the cited document(s) with _____, Registered Agent / Officer or Agent.

M. VALENTI #709

Investigator
Office of the Attorney General

Subscribed and sworn to before me this 25th day of September, 2023 at _____

Dariusz Karman
Notary Public



STATE OF ILLINOIS

COUNTY OF Cook)SS.

CASE NUMBER: PCB 2024 - 016

AFFIDAVIT OF SERVICE

I, Mario Valenti, being first duly sworn, depose and state as follows:

I am an Investigator in the Office of the Attorney General, State of Illinois. Pursuant to 15 ILCS 205/4c investigators employed by the Attorney General have all the powers possessed by sheriffs.

I am over 21 years of age and not a party in this case.

I served the within Notice and Complaint and a copy of the attached N/A

Cyriac K. Chandy (RA for CYPR Harvey, Inc. dba Quick Gas and Mini Mart, Inc.), on the 19th day of Sep, 2023 at approximately 2:15 pm by:

PERSONAL service was made by giving a copy of the aforementioned _____ to _____, _____, _____, _____
Race Age Sex

personally at _____ in _____ County, Illinois.

SUBSTITUTE service on _____ was made by handing the aforementioned _____ to _____, a member of the same household, (who is 13 years of age or older) _____, _____, _____
Race Age Sex

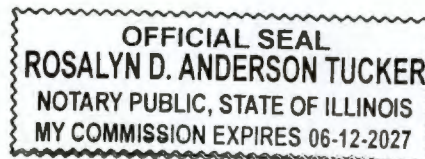
informing that person of the contents of the above cited document(s) on the _____ day of _____, 20____ at the hour of _____, at _____, in _____, County of _____, his/her usual place of residence and by placing the document(s) in the United States Mail on _____, with postage fully prepaid and addressed to the Respondent's last known address.

CORPORATION OR PARTNERSHIP service on 19th of Sep 23 at 1936 Alexandra Ct. in Northbrook, IL. 60062 by leaving a copy of the Notice and Complaint and of the cited document(s) with Cyriac K. Chandy (RA for CYPR Harvey, Inc. dba Quick Gas and Mini Mart, Inc.), Registered Agent / Officer or Agent.

M. Valenti #109
Investigator
Office of the Attorney General

Subscribed and sworn to before me this 20th day of September, 2023 at _____

Rosalyn D. Anderson Tucker
Notary Public



STATE OF ILLINOIS

COUNTY OF Cook)SS.

CASE NUMBER: PCB 2024 - 016

AFFIDAVIT OF SERVICE

I, Mario Valenti, being first duly sworn, depose and state as follows:

I am an Investigator in the Office of the Attorney General, State of Illinois. Pursuant to 15 ILCS 205/4c investigators employed by the Attorney General have all the powers possessed by sheriffs.

I am over 21 years of age and not a party in this case.

I served the within Notice and Complaint and a copy of the attached N/A

Cyriac K. Chandy (RA for Harvey Real Estate, Inc.), on the 19th day of Sep, 2023 at approximately 2:15 pm by:

PERSONAL service was made by giving a copy of the aforementioned _____ to _____, _____, _____, _____
Race Age Sex

personally at _____ in _____ County, Illinois.

SUBSTITUTE service on _____ was made by handing the aforementioned _____ to _____, a member of the same household, (who is 13 years of age or older) _____, _____, _____
Race Age Sex

informing that person of the contents of the above cited document(s) on the _____ day of _____, 20____ at the hour of _____, at _____, in _____, County of _____, his/her usual place of residence and by placing the document(s) in the United States Mail on _____, with postage fully prepaid and addressed to the Respondent's last known address.

CORPORATION OR PARTNERSHIP service on 19th of Sep 23 at 1936 Alexandra Ct. in Northbrook, IL. 60062 by leaving a copy of the Notice and Complaint and of the cited document(s) with Cyriac K. Chandy (RA for Harvey Real Estate, Inc.), Registered Agent / Officer or Agent.

M. VALENTI #109
Investigator
Office of the Attorney General

Subscribed and sworn to before me
this 20th day of September, 2023 at _____
Rosalyn D Anderson-Tucker
Notary Public

