

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB NO. 16-_____
)	(Enforcement)
)	
SUGAR CAMP ENERGY, LLC., a Delaware)	
Limited Liability Company,)	
)	
Respondent.)	

NOTICE OF FILING

Brian Clappier, Assistant Attorney General, hereby certifies that he has served a copy of the foregoing Notice of Filing, Complaint, Stipulation and Proposal for Settlement and Motion for Relief from Hearing Requirements upon:

Rashda Buttar
General Counsel
Foresight Energy LP
One Metropolitan Square
211 North Broadway, Suite 2600
St. Louis, MO 63102

by placing a copy of same in the United States Mail in Springfield, Illinois, with postage fully prepaid on March 16, 2016.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS, ex rel. LISA
MADIGAN, Attorney General,
State of Illinois

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

BY: s/Brian Clappier
Brian Clappier
Assistant Attorney General

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No.
)	(Enforcement)
)	
SUGAR CAMP ENERGY, LLC, a Delaware)	
Limited Liability Company.)	
)	
Respondent.)	

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency, complains of Respondent, SUGAR CAMP ENERGY, LLC, a Delaware Limited Liability Company, as follows:

COUNT I

UNDERGROUND INJECTION CONTROL PERMIT PROGRAM VIOLATIONS
BY SUGAR CAMP ENERGY, LLC

1. This Complaint is brought by the Attorney General on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA"), pursuant to the terms and provisions of Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31 (2014).

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2014), and charged *inter alia*, with the duty of enforcing the Act in proceedings before the Illinois Pollution Control Board ("Board").

3. This Complaint is brought pursuant to Section 31 of the Act, 415 ILCS 5/31 (2014), after providing the Respondent with notice and the opportunity for a meeting with the Illinois EPA.

4. Section 12(g) of the Act, 415 ILCS 5/12(g) (2014), provides in pertinent part:

No person shall:

(g) Cause, threaten or allow the underground injection of contaminants without a UIC permit issued by the Agency under Section 39(d) of this Act, or in violation of any term or condition imposed by such permit, or in violation of any regulations or standards adopted by the Board or of any order adopted by the Board with respect to the UIC program.

5. Section 704.121 of the Board's Waste Disposal Regulations, 35 Ill. Adm. Code 704.121, provides in pertinent part:

Any underground injection, except into a well authorized by permit or rule issued pursuant to this Part and 35 Ill. Adm. Code 705 is prohibited. The construction of any well required to have a permit under this Part is prohibited until the permit has been issued.

6. The Respondent is a "person" as that term is defined under Section 3.315 of the Act, 415 ILCS 5/3.315 (2014), as follows:

"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.

7. The term "well" is defined under Section 3.555 of the Act, 415 ILCS 5/3.555 (2014), as follows:

"Well" means a bored, drilled or driven shaft, or dug hole, the depth of which is greater than the largest surface dimension.

8. SUGAR CAMP ENERGY, LLC (“SUGAR CAMP”) is a Delaware limited liability company in good standing, registered with the Delaware Secretary of State, and authorized to conduct business in Illinois.

9. At all times relevant to this Complaint, SUGAR CAMP has owned and operated two active coal mines (“the Site”) located at 11351 N. Thompsonville Road near Macedonia, Franklin County, Illinois.

10. On May 31, 2013, SUGAR CAMP submitted a permit application for Underground Injection Control (“UIC”) Class I non-hazardous wells located at the Site.

11. The Illinois EPA acknowledged receipt of the application and replied on November 8, 2013 with a letter to SUGAR CAMP citing numerous technical deficiencies in the application.

12. On December 18, 2013, an Illinois EPA inspector inspected the Site and met with the Chief Engineer for SUGAR CAMP. At the time of the inspection, SUGAR CAMP had drilled two UIC wells to approximate depths of 12,800 feet. SUGAR CAMP completed the first well in October of 2013. SUGAR CAMP completed the second well in February of 2014.

13. At the time of the December 18, 2013 inspection, the first well had been constructed with a four-foot “stick-up” capped pipe with a four feet wide concrete pad visible above ground. There was also a large drill rig constructing the second well on the Site.

14. On January 29, 2014, the Illinois EPA sent Violation Notice L-2014-1003 to SUGAR CAMP, citing violations of Section 12(g) of the Act, 415 ILCS 5/12(g) (2014), and 35 Ill. Adm. Code Section 704.121.

15. SUGAR CAMP requested a meeting pursuant to Section 31(a) of the Act, 415 ILCS 5/31(a) (2014) and the Illinois EPA held a meeting with SUGAR CAMP on March 13, 2014.

16. On April 2, 2014, SUGAR CAMP submitted a Compliance Commitment Agreement ("CCA") to the Illinois EPA.

17. On April 18, 2014, the Illinois EPA sent a Notice of Non-Issuance of Compliance Commitment Agreement to SUGAR CAMP.

18. On October 20, 2014, the Illinois EPA sent a Notice of Intent to Pursue Legal Action to SUGAR CAMP.

19. SUGAR CAMP did not have a UIC permit to construct wells at the Site.

20. By constructing a well capable of injecting contaminants underground and threatening to inject contaminants underground without a UIC permit issued by the Illinois EPA, SUGAR CAMP violated Section 12(g) of the Act, 415 ILCS 5/12(g) (2014).

21. By failing to obtain a UIC permit from the Illinois EPA before constructing UIC wells at the Site, SUGAR CAMP violated Section 704.121 of Board's Waste Disposal Regulations, 35 Ill. Adm. Code 704.121, and thereby also violated Section 12(g) of the Act, 415 ILCS 5/12(g) (2014).

PRAYER FOR RELIEF

WHEREFORE, the Complainant, People of the State of Illinois, respectfully requests that the Board grant the following relief:

A. Find that SUGAR CAMP violated Section 12(g) of the Act, 415 ILCS 5/12(g) (2014), and Section 704.121 of the Board's Waste Disposal Regulations, 35 Ill. Adm. Code 704.121;

B. Order SUGAR CAMP to cease and desist from further violations of Section 12(g) of the Act, 415 ILCS 5/12(g) (2014), Section 704.121 of the Board's Waste Disposal Regulations, 35 Ill. Adm. Code 704.121, and associated regulations;

C. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2014), impose on SUGAR CAMP a monetary penalty of Fifty Thousand Dollars (\$50,000) for each violation of the Act and associated regulations, with an additional penalty of Ten Thousand Dollars (\$10,000) for each day of violation;

D. Order SUGAR CAMP to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and,

E. Grant such other and further relief as the Board deems appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
LISA MADIGAN, Attorney General of the
State of Illinois

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

By:



ANDREW B. ARMSTRONG, Chief
Environmental Bureau South
Assistant Attorney General

BRIAN CLAPPIER
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
(217) 782-9034
ARDC #: 6307721
bclappier@atg.state.il.us
ebs@atg.state.il.us

Dated: 03/14/2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. -
)	(Enforcement - _____)
SUGAR CAMP ENERGY, LLC, a Delaware)	
limited liability company,)	
)	
Respondent.)	

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and SUGAR CAMP ENERGY, LLC ("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. (2014), 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. A Complaint filed simultaneously with this stipulation was filed on behalf of the People of the State of Illinois by Lisa Madigan, Attorney General of the State of Illinois, on her own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415

ILCS 5/31 (2014), against the 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 (2014).

3. At all times relevant to the Complaint, the Respondent was and is a Delaware limited liability company that is authorized to transact business in the State of Illinois.

4. At all times relevant to the Complaint, the Respondent owned and operated a coal mining facility located at 11351 N. Thomsonville Road, near Macedonia, Franklin County, Illinois (the "Site").

5. On December 18, 2013, an Illinois EPA inspector inspected the Site and met with the Chief Engineer for the Respondent. At the time of the inspection, the Respondent had drilled two UIC wells ("Well 1" and "Well 2") to approximate depths of 12,800 feet. The Respondent had begun drilling Well 1 on June 4, 2013 and finished drilling Well 1 on September 13, 2013. The Respondent had begun drilling Well 2 on October 11, 2013 and finished drilling Well 2 on October 12, 2014. At no time prior to December 18, 2013 did the Respondent have a permit authorizing Wells 1 or 2. Respondent asserts that it relied on a drilling consultant who provided an erroneous interpretation of the regulations that allowed drilling of the well prior to receipt of a permit, but not construction of any injection-related apparatus or injection until the permit was received. However, it is the Respondent's responsibility to follow the regulations despite any erroneous regulatory interpretations by a consultant.

6. The purpose of Well 1 and Well 2 is to dispose of contaminated groundwater which exceeds state water quality standards into deep confining layers. The Respondent asserts that groundwater is infiltrating the Respondent's underground coal mine at the Site and that the wells do not impact in any way production at the Site. The Respondent further asserts that it

gained no real economic benefit from the alleged violation.

B. Allegations of Non-Compliance

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

Count I: Underground Injection Control Permit Program Violations By Sugar
Camp Energy, LLC.
415 ILCS 5/12(g) (2014); 35 Ill. Adm. Code 704.121

C. Non-Admission of Violations

The 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. The Respondent does not admit to the violations alleged in the Complaint filed in this matter and referenced above.

D. Compliance Activities to Date

1. On May 20, 2014, the Respondent received Temporary Emergency Permit Number UIC-016-SCM from the Illinois EPA to complete construction of the wells that were the basis of Violation Notice L-2014-1003. Temporary Emergency Permit Number UIC-016-SCM had an expiration date of May 20, 2015. On May 22, 2015, the Illinois EPA granted an extension of the Permit UIC-016-SCM, which expires on December 31, 2015.

2. The Respondent did not inject fluids into the UIC wells prior to obtaining Temporary Emergency Permit UIC-016-SCM on May 20, 2014.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. The 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 the 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 (2014).

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

Section 33(c) of the Act, 415 ILCS 5/33(c) (2014), 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. The Respondent proceeded with the construction of two unpermitted UIC wells before obtaining Temporary Emergency Permit UIC-016-SCM. However, the Respondent asserts that the Respondent did not construct any injection apparatus or conduct any injection prior to receiving permits. While it is ultimately the Respondent's responsibility to follow all

applicable regulations, the Respondent asserts that it relied on erroneous compliance advice from its retained expert in underground injections.

2. There is social and economic benefit to the UIC wells. The Respondent has reported that the UIC wells support the Respondent's operations. The Respondent asserts that the Respondent directly employs approximately 400 direct employees and another approximately 200 people indirectly, such as independent contractor truck drivers. The Respondent asserts that the Respondent's operations have generated over \$78 million in local, state, and federal revenues.

3. Operation of the UIC wells were and are suitable for the area in which it is located.

4. Complainant contends that obtaining a permit prior to construction of the UIC wells at the site was both technically practicable and economically reasonable. The Respondent contends that it has subsequently complied with the Act and the Board regulations; the Illinois EPA has issued the Respondent Temporary Emergency Permit UIC-016-SCM.

5. The 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) (2014), 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. The Respondent failed to obtain Temporary Emergency Permit UIC-016-SCM for construction activities prior to beginning construction activities at the Site. The violations began when construction on the wells at the Site commenced on or around June 4, 2013 for the first well and October 11, 2013 for the second well. The violations continued until May 20, 2014, when the Illinois EPA granted Temporary Emergency Permit No. UIC-016-SCM to the Respondent for the construction of the wells.
2. The Respondent was diligent in attempting to come back into compliance with the Act and Board regulations once the Illinois EPA notified it of its noncompliance.
3. Any economic benefit attributable to the noncompliance would be minimal.
4. Complainant has determined that, based upon the specific facts of this matter, a

penalty of Forty Thousand Dollars (\$40,000.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. The Respondent has no previously adjudicated violations of the Act.
6. Self-disclosure is not at issue in this matter.
7. The settlement of this matter does not include a supplemental environmental project.
8. A Compliance Commitment Agreement was proposed by the Respondent, but rejected by the Illinois EPA.

V. TERMS OF SETTLEMENT

A. Penalty Payment

1. The Respondent shall pay a civil penalty in the sum of Forty Thousand Dollars (\$40,000.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Interest and Default

1. If the Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, the 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, the 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 the 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:

Brian Clappier
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
500 S. Second Street
Springfield, Illinois 62701

D. Future Compliance

1. The Respondent shall refrain from construction of underground injection control wells unless properly permitted by the Illinois EPA.

2. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, her employees and representatives, shall have the right of entry into and upon the 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, her employees and representatives, may take photographs, samples, and

collect information, as they deem necessary.

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

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

E. 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.

F. Release from Liability

In consideration of the Respondent's payment of the \$40,000.00 penalty (and any specified costs and accrued interest), its commitment to cease and desist as contained in Section V.D.4 above, completion of all activities required hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives and discharges the 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 simultaneously with this Stipulation. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the 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 the 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 the Respondent.

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.

[THE REMAINDER OF THIS PAGE IS LEFT INTENTIONALLY BLANK]

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

LISA MADIGAN
Attorney General
State of Illinois

LISA BONNETT, Director
Illinois Environmental Protection Agency

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

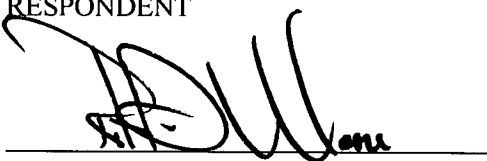
BY: 
ANDREW ARMSTRONG, Chief
Environmental Bureau, Springfield
Assistant Attorney General

BY: 
JOHN J. KIM
Chief Legal Counsel

DATE: 03/10/2016

DATE: 3/8/16

RESPONDENT


Super Comp Energy, LLC - President, CEO

DATE: _____

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No.
)	(Enforcement)
)	
SUGAR CAMP ENERGY, LLC, a Delaware)	
Limited Liability Company.)	
)	
Respondent.)	

MOTION FOR RELIEF FROM HEARING REQUIREMENT

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and requests relief from the requirement of a hearing in this matter. In support thereof, the Complainant states as follows:

1. Along with this Motion, Complainant filed on March 14, 2016 the initial Complaint in this matter and a Stipulation and Proposal for Settlement executed between Complainant and Respondent, Sugar Camp Energy, LLC.

2. Section 31 of the Act, 415 ILCS 5/31 (2014), provides, in pertinent part, as follows:

* * *

(c)(2) Notwithstanding the provisions of subdivision (1) of this subsection (c), whenever a complaint has been filed on behalf of the Agency or by the People of the State of Illinois, the parties may file with the Board a stipulation and proposal for settlement accompanied by a request for relief from the requirement of a hearing pursuant to subdivision (1). Unless the Board, in its discretion, concludes that a hearing will be held, the Board shall cause notice of the stipulation, proposal and request for relief to be published and sent in the same manner as is required for hearing pursuant to subdivision (1) of this subsection. The notice shall include a statement that any person may file a written demand for hearing within 21 days after receiving the notice. If any person files a timely written demand for

hearing, the Board shall deny the request for relief from a hearing and shall hold a hearing in accordance with the provisions of subdivision (1).


* * *

3. No hearing is scheduled in this matter.
4. The Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests relief from the requirement of a hearing pursuant to 415 ILCS 5/31(c)(2) (2014).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
LISA MADIGAN
ATTORNEY GENERAL

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

BY: 
BRIAN CLAPPIER
Environmental Bureau, Springfield
Assistant Attorney General

BRIAN CLAPPIER
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
(217) 782-9034
ARDC#: 6307721
bclappier@atg.state.il.us
ebs@atg.state.il.us

Dated: March 10, 2016