

ORIGINAL

KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

114 NORTH ORLEANS STREET - SUITE 810

CHICAGO, ILLINOIS 60610

TELEPHONE

(312) 836-1177

TELEFAX

(312) 836-9083

Direct Dial: 312/836-1177, ext. 124

email: Mark\_Erzen@K-W.COM

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FEB 14 2005

STATE OF ILLINOIS  
Pollution Control Board

JOSEPH V. KARAGANIS  
A. BRUCE WHITE  
BARBARA ANNE MAGEL  
MARK D. ERZEN  
JOHN W. KALICH  
CHRISTOPHER W. NEWCOMB

February 11, 2005

**BY FEDERAL EXPRESS**

Illinois Environmental Protection Agency  
Fiscal Services Division  
1021 North Grand Avenue East  
Springfield, Illinois 62794  
**ATTENTION: Kevin Bryant / Receipts, Mail Code #2**

RE: *State of Illinois v. State Oil, et al.*, PCB 97-103

Dear Mr. Byrant:

Please find enclosed two checks in compliance with the requirements of the Order and Opinion of the Illinois Pollution Control Board dated March 20, 2003<sup>1</sup> in the case entitled *People of the State of Illinois v. State Oil Company, et al.*, Case No. PCB 97-103.

The first check relates to the following requirement:

Check Information:	Bank One Official Check Dated 2/1/05, Check Number 928003957
Check Amount:	\$20,000.00
Payee:	Environmental Protection Trust Fund
Purpose of Payment:	Payment by Charles Abraham, Josephine Abraham, and Millstream Service, Inc. of Civil Penalties per 3/20/2003 Order and Opinion of the Illinois Pollution Control Board, page 27, paragraph 4
Information For Application of Payment:	Case Number: PCB 97-103 Case Name: People of the State of Illinois v. State Oil Company, et al. Payees: Charles Abraham, Josephine Abraham, and Millstream Service, Inc. Payee's EIN: 322-22-9198

<sup>1</sup> The payment date was extended due to appeals to February 14, 2005.

Illinois Environmental Protection Agency  
Attention: Kevin Bryant  
February 11, 2005  
Page -2-

The second check relates to the following requirement:

Check Information:	Karaganis, White & Magel Ltd. Client Fund Trust Account, Dated 2/11/05, Check Number 1304
Check Amount:	\$86,652.50
Payee:	Environmental Protection Trust Fund
Purpose of Payment:	Payment by Charles Abraham, Josephine Abraham, Millstream Service, Inc., William Anest, Peter Anest, and State Oil Company of Illinois Environmental Protection Agency Remediation Costs of \$86,652.50 per 3/20/2003 Order and Opinion of the Illinois Pollution Control Board, page 27, paragraph 3
Information For Application of Payment:.	Case Number: PCB 97-103 Case Name: People of the State of Illinois v. State Oil Company, et al. Payees: Charles Abraham, Josephine Abraham, Millstream Service, Inc., William Anest, Peter Anest, and State Oil Company Payees' EIN: not applicable (multiple parties)

The other payment required by the Order and Opinion of the Board (involving a civil penalty to be paid by William Anest, Peter Anest, and State Oil Company) has, we understand, already been made under separate cover.

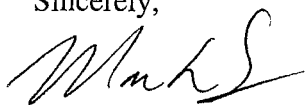
Please call me if you have any questions. Thank you.

MDE/ms

Enclosures: checks noted above

cc: Chuck and Josephine Abraham  
John Baumgartner, Esq.  
Lou Bland, Esq.  
Mark Gurnik, Esq., IEPA  
Gerald T. Karr, Esq., Assistant Attorney General  
✓ Dorothy M. Gunn, Clerk of the IPCB  
Barbara Magel, Esq.

Sincerely,



Mark Erzen

mdeabt84.DOC



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

**Lisa Madigan**  
ATTORNEY GENERAL

December 22, 2004

Mark Erzen, Esquire  
Karaganis & White  
414 North Orleans Street, Suite 810  
Chicago, Illinois 60610

John Baumgartner, Esquire  
Churchill, Baumgartner & Quinn, Ltd.  
Two South Whitney  
Box 284  
Grayslake, Illinois 60030

**RE: People v. State Oil, et al.  
PCB 97-103**

Dear Counsel:

Consistent with the telephone conversation of today, Wednesday December 22, 2004, between Mark Erzen, Bill Ingersoll and Gerald Karr, it is the position of the Illinois Attorney General's Office and the Illinois EPA that the penalty and costs ordered by the Illinois Pollution Control Board in the above-referenced matter are due within sixty (60) days of the Illinois Supreme Court mandate which issued on December 16, 2004 or on or before February 14, 2005. Please feel free to call with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Gerald T. Karr".

Gerald T. Karr  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph, 20th Flr.  
Chicago, Illinois 60601  
(312)814-3369  
[gkarr@atg.state.il.us](mailto:gkarr@atg.state.il.us)

cc: Bill Ingersoll, IEPA  
Mark Gurnik, IEPA

RECEIVED  
DEC 23 2004

DEC 23 2004

KARAGANIS, WHITE & MANGEL LTD.

**KARAGANIS WHITE & MAGEL LTD.**

CLIENT FUND TRUST ACCOUNT  
414 N. ORLEANS ST. STE. 810  
CHICAGO, IL 60610

1304

DATE February 11, 2005

2-2566/710

PAY TO THE ORDER OF Environmental Protection Trust Fund \$ 86,652.50

Eighty-Six Thousand Six Hundred Fifty Two and 50/100 DOLLARS



**HARRIS BANK**

Harris Trust and Savings Bank  
Private Bank - Chicago  
111 W. Monroe  
Chicago, Illinois 60603

FOR CASE # PCB 97-103

People of the State of Illinois v. State Oil Company et al.

⑈001304⑈ ⑆07⑆02566⑆ 29⑆0307996⑈

Security Features  
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MP

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HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

**BANK ONE**

Illinois

**OFFICIAL CHECK**

928003957 23-97  
1020

Date 02/01/2005

Remitter CHARLES ADRAHAM DBA MILLSTREAM 322229198

Pay: TWENTY THOUSAND DOLLARS AND 00 CENTS

Pay To The Order Of ENVIRONMENTAL PROTECTION TR FD PCB97-103

\$ \*\*\*\*\*20,000.00 \*\*\*

Drawer: JPMORGAN CHASE BANK, N.A.

*Stephen P. Hughes*  
First Vice President

Issued by Integrated Payment Systems Inc., Englewood, Colorado  
JPMorgan Chase Bank, N.A., Denver, Colorado

Security Features  
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