

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

TIMBER CREEK HOMES, INC., )

Petitioner )

v. )

VILLAGE OF ROUND LAKE PARK, )  
ROUND LAKE PARK VILLAGE BOARD )  
and GROOT INDUSTRIES, INC., )

Respondents )

No. PCB 2014-099

(Pollution Control Facility Siting Appeal)

 ORIGINAL

NOTICE OF FILING

To: see service list

**PLEASE TAKE NOTICE** that on or before March 31, 2014 before 4:30 p.m., I filed the attached with the Clerk of the Illinois Pollution Control Board, copies of which are hereby served upon you by email.

By: Glenn C. Sechen

The Sechen Law Group, PC  
Attorney for the  
Village of Round Lake Park

Certificate of Service

The undersigned hereby attorney certifies that on the 31th day of March, 2014, a copy of the above was filed and served by email, as agreed by counsel, upon the persons shown in the Service List:

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Attorney for the  
Village of Round Lake Park

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

TIMBER CREEK HOMES, INC.,	)	
	)	
Petitioner	)	
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v.	)	No. PCB 2014-099
	)	
VILLAGE OF ROUND LAKE PARK,	)	(Pollution Control Facility Siting Appeal)
ROUND LAKE PARK VILLAGE BOARD	)	
and GROOT INDUSTRIES, INC.,	)	
	)	
Respondents	)	

**VILLAGE OF ROUND LAKE PARK'S RESPONSE TO PETITIONER'S FIRST SET OF INTERROGATORIES TO VILLAGE OF ROUND LAKE PARK AND ROUND LAKE PARK VILLAGE BOARD**

Now comes the Village of Round Lake Park by its attorney, The Sechen Law Group and hereby responds to the First Set of Interrogatories of Petitioner, Timber Creek Homes, Inc. ("TCH") as follows:

**DEFINITIONS AND INSTRUCTIONS**

- A. Unless otherwise specifically indicated, the period of time encompassed by these Interrogatories is March 1, 2008 through June 21, 2013.
- B. The term "person" includes any individual, corporation, unit of government, trust, and any other collective organization or entity unless the context clearly indicates reference to an individual person.
- C. Whenever reference is made to any person or entity by name, such reference shall be deemed to include all of the person's or entity's agents, employees, appointed officials, elected officials and attorneys, and the entity's subsidiaries, departments, committees, affiliates, merged,

consolidated or acquired predecessors, divisions and holding or parent companies, and includes present and former elected and appointed officials, officers, directors, shareholders, agents, employees and attorneys.

- D. The term "relating to" means referring to, reflecting, and/or pertaining in any way, directly or indirectly, to or in any legal, logical or factual way connected with the matter discussed, and includes any documents used in the preparation of any document called for by each paragraph of these interrogatories.
- E. The term "communication" includes all discussions, conversations, interviews, meetings, negotiations, emails, instant messaging, cablegrams, mailgrams, telegrams, telexes, cables, or other forms of written or verbal intercourse, however transmitted, including reports, notes, memoranda, lists, agendas, and other documents and records of communication, the identity of person(s) to whom and by whom it was made, the date it was made, the circumstances under which it was made, including but not limited to the location where it was made, the date it was made, the means by which it was made, and the form in which it was made.
- F. As used herein, "and" as well as "or" should be considered either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories any information which might otherwise be construed to be outside of their scope.
- G. Wherever appropriate herein, the singular form of a word should be

interpreted to include the plural, and vice versa.

- H. As used herein, the word "identify" when used in connection with a verbal communication shall mean to state the following:
1. The date of that communication;
  2. Identify the persons who were parties to that communication;
  3. Identify the persons who were witnesses (other than the parties) to the communication;
  4. State whether that communication was face-to-face and/or over the telephone, and if face-to-face, describe the location of that communication; and
  5. Identify any documents which pertain to that communication.
- I. As used herein, the word "identify" when used in reference to a natural person (i.e., human being) means to state:
1. The person's full name;
  2. Present (or last known) address;
  3. Present (or last known) occupation or position; and
  4. Name of his present (or last known) employer.
- L. The word "identify" when used in reference to a person other than an individual, means to state:
1. Its full name;
  2. Its present (or last known) address ; and
  3. Its present (or last known) telephone number.
- M. The word "identify" when used in reference to a document, means to

state:

1. Its date;
  2. Its subject and its substance;
  3. Its author
  4. Its recipients; and
  5. The type of documents (e.g., letter memorandum, telegram, chart, computer input or print-out, photograph, sound reproduction, etc.
- N. If you object to any of the definitions or instructions herein, or to any of the interrogatories herein, state in writing each objection and the grounds thereof.

**GENERAL RESPONSE:** The Application was filed on June 21, 2013. The Village Board granted siting on December 12, 2013. The Hearing Officer limited TCH discovery requests to the dates between the date on which RLP's Appraiser was retained and the date on which siting was granted. RLP's Appraiser was retained on June 20, 2013 when the Mayor signed the fee letter or contract of RLP's Appraiser. Accordingly, discovery responses are limited to those non-privileged things related to the subject waste transfer station between June 20, 2013 and December 12, 2013 inclusive unless the response expressly states to the contrary or the request otherwise limits the applicable dates. Nonetheless, while little or no work could be or was done prior to the filing of the Application, things regarding RLP's Appraiser are being produced going back to early 2013.

Prior to the filing of the Application and subsequent to the grant of siting, the

Village of Round Lake Park, sometimes referred to as RLP or VRLP, and the Village Board functioned together as a unit of government. Upon the filing of the Application and until the grant of siting, Counsel for the Village of Round Lake Park isolated himself from and had no contact with the Village Board outside of the public hearing. Accordingly, the Village Attorney (Counsel for the Village Board) will substantively respond to all discovery requests as a request may relate to that time prior to the filing of the Application. RLP will supplement the response of the Village Attorney as appears to be necessary. Permitted post filing and pre decision communication among counsel and/or the hearing officer is beyond the scope of the responses. The responses herein are limited to the proposed transfer station at issue and things not subject to a claim of privilege. Any privileged material produced is without waiver. Further, there is an agreement with TCH precluding the application of any claim of waiver.

RLP Counsel has no independent recollection related to any single request or the time frame related thereto, other than that specifically noted in an individual response. A number of documents may be produced by RLP. Some of those documents may refer to communications and provide a guide as to when other communications may have occurred and various details related to each.

A response to one discovery request may be relevant to another request. In part due of the nature of the TCH requests. A response to a one request may well include things that are relevant to other requests but may not be included in more than one response. Pursuant to 101 IL Admin Code 616 (h) RLP's responses will be amended as required. Accordingly, as to each request, investigation continues.

**INTERROGATORIES**

1. Identify all communications in verbal, written or electronic form made by or to any member of the RLP Board relating to the subject of a waste transfer station in the Village of Round Lake Park.

**RESPONSE:** See response to production request and the General Response. See also, the response of the Village Board.

2. Identify all communications in verbal, written or electronic form made by or to VRLP relating to the subject of a waste transfer station in the Village of Round Lake Park.

**RESPONSE:** See the previous response. Further, this request is particularly vague, unclear. On June 21, 2013 communication occurred between RLP Counsel and one or more experts or, if you will, RLP's consulting experts regarding obtaining copies of the Application so that analysis of the Application can begin. On the same date, Doug Allen of CBI/Shaw filed Groot's Application in the presence of RLP's Counsel, the Village Board's Counsel and perhaps representatives of Lake County and/or SWALCO. Details regarding the filing were discussed.

3. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and any other member of the RLP Board where the subject of a waste transfer station in the Village of Round Lake Park was discussed.

**RESPONSE:** See response to production request and the General Response. See also, the response of the Village Board.



4. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and any officer, agent, employee or representative of Groot Industries, Inc.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

5. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Lee Brandsma.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

6. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Larry Groot.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

7. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Walter Willis.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

8. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Devin Moose.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

9. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Chicago Bridge & Iron Company.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

10. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Shaw Environmental, Inc.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board.

11. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Glenn Sechen from the date of his retention by VRLP to the present.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board. This is a blatantly improper request under the Rules of Professional Conduct as, during most of the time requested, RLP's Counsel, Mr. Sechen, was co-counsel for the Village and, accordingly, an attorney-client relationship existed. No such prohibited communications occurred when an attorney-

client relationship did not exist, to wit subsequent to the filing of the Application through decision. However, the limitations placed on TCH's discovery request in whole or in part obviate the necessity of an extensive response.

12. Identify all meetings, conversations, communications and contacts between any member of the RLP Board and Dale Kleszynski from the date of his retention by VRLP to the present.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board. RLP Counsel believes no such meetings, conversations, communications and contacts occurred. However, Mr. Kleszynski's [sometimes referred to as RLP's Appraiser] contract retainer agreement was signed.

13. Identify all meetings, conversations, communications and contacts between VRLP and Dale Kleszynski from the date of his retention by VRLP to the present.

**RESPONSE:** See response to production request and the General Response. See *also*, the response of the Village Board. RLP Counsel recalls generally that email and phone calls occurred which may be generally outlined by the documents being produced. RLP Counsel recalls delivering the siting application to office of RLP's Appraiser and that Kevin Finn was present for some or all of that visit. In the first half of July, 2013, RLP's Counsel met with RLP's Appraiser. Included was a visit to the site and a tour of the area. Al Maiden was present for some of this. RLP's counsel also met and conversed with RLP's Appraiser at the hearing venue on some hearing dates,

before, after and/or during some of the hearings and during some of the breaks therein. Discussions generally concerned the testimony at the hearings, Mr. Keszynski's input and testimony.

**CERTIFICATON**

The Village of Round Lake Park advises that its investigation is continuing and that it reserves the right to supplement its responses hereto. However, the undersigned certifies that he verily believes the forgoing response is, at this time, true, complete and accurate to the best of his knowledge. Dated March 31, 2014.

Respectfully submitted,  
Village of Round Lake Park

By Glenn C. Sechen  
One of Its Attorneys

Glenn C. Sechen  
The Sechen Law Group, PC  
13909 Laque Drive  
Cedar Lake, IN 46303  
312-550-9220

**CERTIFICATE OF SERVICE**

I, Glenn C. Sechen, an attorney, certify that on this 31<sup>st</sup> day of March, 2014, by email, I have served a copy of the attached upon:

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meetings, minutes or records of conferences, lists of persons attending meetings or conferences, reports and/or summaries of investigations, opinions, or reports of consultants, appraisals, evaluations, records, contracts, agreements, leases, invoices, receipts, preliminary drafts, however denominated, by whomever prepared, to whomever addressed, which are in possession of the respondent as defined herein. Further, "documents" includes any copies of documents which are not identical duplicates of originals, including, but not limited to, all drafts of whatever date and copies with typed or handwritten notations, and any other form of reporting, storing, maintaining or indexing such information, including, without limitation, electronic storage, computer storage, shorthand notes, diagrams, magnetic cards and other forms of storage.

C. "Communication" includes all discussions, conversations, interviews, meetings, negotiations, emails, instant messaging, cablegrams, mailgrams, telegrams, telexes, cables, or other forms of written or verbal intercourse, however transmitted, including reports, notes, memoranda, lists, agendas, and other documents and records of communication, the identity of person(s) to whom and by whom it was made, the date it was made, the circumstances under which it was made, including but not limited to the location where it was made, the date it was made, the means by which it was made, and the form in which it was made.

D. "Relating to" shall refer to documents that contain or refer in any way, directly or indirectly, to or in any legal, logical or factual way, or are in any other way connected with, the subject matter of a paragraph of this Request.

E. "Person" includes any individual, corporation, unit of government, trust, and any other collective organization or entity unless the context clearly indicates reference to an individual person.

F. Whenever reference is made to any person or entity by name, such reference shall be deemed to include all of the person's or entity's agents, employees, appointed officials, elected officials and attorneys, and the entity's subsidiaries, departments, committees, affiliates, merged, consolidated or acquired predecessors, divisions and holding or parent companies, and includes present and former elected and appointed officials, officers, directors, shareholders, agents, employees and attorneys.

G. As used herein, "and" as well as "or" should be considered either disjunctively or conjunctively as necessary to bring within the scope of this request any documents which might otherwise be construed to be outside its scope.

H. This request shall be deemed continuing so as to require prompt, further and supplemental production if you obtain possession of documents responsive to any request herein.

I. If you assert that any document called for by this request is privileged, you shall provide the following information with respect to each document:

- (1) Its date;
- (2) Its author;
- (3) All addresses of recipients of the original or copies thereof;
- (4) A brief description of its subject matter and physical size; and
- (5) The nature of the privilege claimed.

J. Wherever appropriate herein, the singular form of a word should be interpreted to include the plural, and vice versa.

K. In producing documents responsive to this request, you are requested to indicate for which paragraph each document is responsive.

L. If any document requested by this request has been destroyed, mutilated, altered, redacted, or discarded, that document must be identified by stating:



- (1) The name and address of the sender of the document;
- (2) The name and address of the author of the document;
- (3) The name and address of all entities to whom the document was addressed;
- (4) The name and address of all entities to whom a copy of the document was sent;
- (5) The name and address of all entities known to Defendants who had seen the document or participated in communications about the document;
- (6) The job title of each entity listed in (1) through (5) above;
- (7) The name and address of all entities known to Defendants who have received or currently possess a copy of the document;
- (8) The date of the document;
- (9) The date of destruction, alteration, mutilation, redaction, or discard of the document, manner of destruction, alteration, mutilation, redaction, or discard of the document, and reasons for destruction, alteration, mutilation, redaction, or discard of the document;
- (10) A brief description of the nature and subject of the document; and
- (11) The entity authorizing and performing the destruction, alteration, mutilation, redaction, or discard of the document.

M. If you object to any of the definitions or instructions herein, or to any of these specific requests herein, state in writing each objection and the grounds thereof.

N. You are requested to produce an affidavit stating whether the production is complete in accordance with this request as provided in Illinois Supreme Court Rule 214.

**GENERAL RESPONSE:** The Application was filed on June 21, 2013. The Village Board granted siting on December 12, 2013. The Hearing Officer limited TCH discovery requests to the dates between the date on which RLP's Appraiser was retained and the date on which siting was granted. RLP's Appraiser was retained on June 20, 2013 when the Mayor signed the fee letter or contract of RLP's Appraiser. Accordingly, discovery responses are limited to those non-privileged things related to the subject waste transfer station between June 20, 2013 and December 12, 2013 inclusive unless the response expressly states to the contrary or the request otherwise limits the applicable dates. Nonetheless, while little or no work could be or was done prior to the filing of the Application, things regarding RLP's Appraiser are being produced going back to early 2013.

Prior to the filing of the Application and subsequent to the grant of siting, the Village of Round Lake Park, sometimes referred to as RLP or VRLP, and the Village Board functioned together as a unit of government. Upon the filing of the Application and until the grant of siting, Counsel for the Village of Round Lake Park isolated himself from and had no contact with the Village Board outside of the public hearing. Accordingly, the Village Attorney (Counsel for the Village Board) will substantively respond to all discovery requests as a request may relate to that time prior to the filing of the Application. RLP will supplement the response of the Village Attorney as appears to be necessary. Permitted post filing and pre decision communication among counsel and/or the hearing officer is beyond the scope of the responses. The responses herein are limited to the proposed transfer station at issue and things not subject to a claim of privilege. Any privileged material produced is without waiver. Further, there is an

agreement with TCH precluding the application of any claim of waiver.

RLP Counsel has no independent recollection related to any single request or the time frame related thereto, other than that specifically noted in an individual response. A number of documents may be produced by RLP. Some of those documents may refer to communications and provide a guide as to when other communications may have occurred and various details related to each.

A response to one discovery request may be relevant to another request. In part due of the nature of the TCH requests. A response to a one request may well include things that are relevant to other requests but may not be included in more than one response. Pursuant to 101 IL Admin Code 616 (h) RLP's responses will be amended as required. Accordingly, as to each request, investigation continues.

#### **DOCUMENTS REQUESTED**

1. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Groot Industries, Inc..

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

2. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Groot Industries, Inc..

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

3. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Lee Brandsma.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

4. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Lee Brandsma.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

5. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Larry Groot.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

6. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Larry Groot between March 2008 and June 21, 2013.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

7. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Walter Willis.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

8. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Walter Willis.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

9. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Chicago Bridge & Iron Company.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

10. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Chicago Bridge & Iron Company.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

11. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and The Shaw Group and/or Shaw Environmental, Inc..

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

12. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and The Shaw Group and/or Shaw Environmental, Inc..

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

13. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Devin Moose.

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

14. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Devin Moose.

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

15. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Doug Allen.

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

16. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Doug Allen.

**RESPONSE:** Known documents will be produced. See General Response. See *also*, the response of the Village Board.

17. All documents relating to or reflecting discussion, consideration or contemplation of a waste transfer station in the Village of Round Lake Park.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board.

18. All documents relating to or reflecting the retention of Glenn Sechen ("Sechen") by VRLP, including, but not limited to, all documents relating to or reflecting the scope of Sechen's retention.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board. A fee agreement will be produced even if not required.

19. All documents relating to or reflecting all services performed by Sechen from the date of his retention by VRLP to the present, including, but not limited to, all invoices or statements for services rendered.

**RESPONSE:** Known documents will be produced. See General Response. See also, the response of the Village Board. Invoices covering the time between June 20, 2013 and December 12, 2013 will be produced even if not required. If produced documents relate to time outside that, they will be redacted accordingly.

20. All documents relating to or reflecting all communications between any member of the RLP Board and Sechen from the date of his retention by VRLP to the present.

**RESPONSE:** This is a blatantly improper request under the Rules of Professional Conduct as, during most of the time requested, RLP's Counsel, Mr. Sechen, was co-counsel for the Village and, accordingly, an attorney-client relationship existed. No such prohibited communications occurred when an attorney-client relationship did not exist,

to wit, subsequent to the filing of the Application through decision. However, the limitation placed on TCH's discovery request in whole or in part obviates the necessity of an extensive response. Known documents will be produced. See General Response. See also, the response of the Village Board.

21. All documents relating to or reflecting the retention of Dale Kleszynski ("Kleszynski") by VRLP, including, but not limited to, all documents relating to or reflecting the scope of Kleszynski's retention

**RESPONSE:** See General Response. See also, the response of the Village Board. Regardless on the limitations placed on TCH's discovery requests additional documents will be produced. Mr. Kleszynski is sometimes referred to as RLP's Appraiser.

22. All documents relating to or reflecting all services performed by Kleszynski from the date of his retention by VRLP to the present, including, but not limited to, all invoices or statements for services rendered.

**RESPONSE:** See the previous response.

23. All documents relating to or reflecting all communications between VRLP and Kleszynski from the date of his retention by VRLP to the present.

**RESPONSE:** See the previous response.

24. All documents relating to or reflecting all communications between any member of the RLP Board and Kleszynski from the date of his retention by VRLP to the present.



**RESPONSE:** See the previous response. RLP Counsel believes no such meetings, conversations, communications and contacts occurred, save perhaps, the approval of Mr. Kleszynski's retention contract.

**CERTIFICATON**

The Village of Round Lake Park advises that its investigation is continuing and that it reserves the right to supplement its responses hereto. However, the undersigned certifies that he verily believes the forgoing response is, at this time, true, complete and accurate to the best of his knowledge. Dated March 31, 2014.

Respectfully submitted,  
Village of Round Lake Park

By *Glenn C. Sechen*  
One of Its Attorneys

Glenn C. Sechen  
The Sechen Law Group, PC  
13909 Laque Drive  
Cedar Lake, IN 46303  
312-550-9220

**CERTIFICATE OF SERVICE**

I, Glenn C. Sechen, an attorney, certify that on this 31<sup>st</sup> day of March, 2014, by internet link, I have served a copy of the attached upon:

**COUNSEL FOR THE VILLAGE BOARD  
VILLAGE OF ROUND LAKE PARK**

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

TIMBER CREEK HOMES, INC.,	)	
	)	
Petitioner	)	
	)	No. PCB 2014-099
v.	)	(Pollution Control Facility Siting Appeal)
	)	
VILLAGE OF ROUND LAKE PARK,	)	
ROUND LAKE PARK VILLAGE BOARD)	)	
and GROOT INDUSTRIES, INC.,	)	
	)	
Respondents	)	

VILLAGE OF ROUND LAKE PARK'S ANSWER TO TIMBER CREEK HOMES, INC.'S  
REQUEST TO ADMIT FACTS AND GENUINENESS OF DOCUMENTS

NOW COMES the Village of Round Lake Park and hereby answers the Request to Admit Facts and Genuineness of Documents filed by Timber Creek Homes by adopting the answer thereto filed by the Village Board.

Respectfully submitted,  
Village of Round Lake Park

By Glenn C. Sechen  
One of Its Attorneys

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