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ARGUMENT

The Plaintiffs-Appellees (“Cammacho”) are commercial truck drivers whom the City of Joliet (“Joliet”) cited for operating a vehicle in excess of a gross vehicle weight rating (“GVWR”). There is no dispute that Cammacho violated Section 19-21(a) of Joliet’s Code of Ordinances.

The circuit court correctly denied Cammacho’s petition for administrative review. The appellate court, on the other hand, erroneously held that Joliet did not have jurisdiction to administratively adjudicate these ordinance violations, and its judgment should be reversed.

Cammacho argues that Joliet did not have authority to administratively adjudicate these GVWR violations. His argument fails because Joliet has home rule authority to adjudicate these offenses, and because Section 1-2.1-2 of the Illinois Municipal Code (“section 1-2.1-2”) does not except Cammacho’s offenses from administrative adjudication.

I. THE CITY OF JOLIET HAS HOME RULE AUTHORITY TO ADMINISTRATIVELY ADJUDICATE CAMMACHO’S OFFENSES.

As we explained in our opening brief, Joliet’s home rule powers include the authority to adjudicate violations of its own ordinances. Appellant’s Brief (“Joliet Br.”) 4. Under the Illinois Constitution, if the General Assembly seeks to preempt such home rule powers, it must enact a statute that specifically provides for preemption. *Id.* The City of Chicago made that point as well. Brief of Amicus Curiae the City of Chicago (“Chicago Br.”) 6. The Statute on Statutes codifies this constitutional principle by providing that “[n]o law enacted after January 12, 1977, denies or limits any power or function of a home rule unit . . . unless there is specific language limiting or denying the power or function and the

language specifically sets forth in what manner and to what extent it is a limitation on or denial of the power or function of a home rule unit.” 5 ILCS 70/7.

Section 1-2.1-2 does not contain any express language preempting home rule authority. 65 ILCS 5/1-2.1-2. In fact, section 1-2.1-2 does not mention home rule at all, let alone provide that it limits home rule powers in any way. That omission is especially glaring in light of the fact that there are at least 55 examples of preemptive language in the Illinois Municipal Code. *See Chicago Br. 8-9*. Thus, the General Assembly plainly knows how to include preemptive language in a statute. It did not do so here.¹ Because section 1-2.1-2 does not satisfy the constitutional or statutory requirements to achieve preemption of home rule powers, it does not preempt Joliet’s authority to administratively adjudicate Cammacho’s offenses.

Cammacho does not even acknowledge the requirement that a statute must include express language in order to preempt home rule authority, much less explain how that requirement is satisfied in section 1-2.1-2. His brief entirely lacks any such argument. This court is not “compelled to serve as an advocate for the appellee.” *First Capitol Mortgage Corporation v. Talandis Construction Corporation*, 63 Ill. 2d 128, 133 (Ill. 1976). Rather, a court may treat a party’s failure to respond to an argument as “acquiescence to” its opponent’s position, *People v. Bailey*, 375 Ill. App. 3d 1055, 1068-69 (2d Dist. 2007), and that treatment is warranted here. Both Joliet and Chicago briefed home rule extensively, *see Joliet Br. 3-6; Chicago Br. 5-11*, and it is a central and dispositive issue. In this

¹ The General Assembly did not intend to preempt home rule powers when it enacted section 1-2.1-2. *Chicago Br. 1-3*. But even if section 1-2.1-2 were deemed ambiguous, that very ambiguity would undermine any argument that section 1-2.1-2 contains the language required to “expressly negate[]” the particular use of home rule authority at issue here. *See Lintzeris v. City of Chicago*, 2023 IL 127547, ¶ 34.

circumstance, Cammacho's failure to respond reveals that he has no counterargument to make. At a minimum, Cammacho has waived the point. "Points not argued [in an appellee's brief] are forfeited and shall not be raised in the reply brief, in oral argument, or on petition for rehearing." Ill. Sup. Ct. R. 341(h)(7), (i).

Rather than identify any language in section 1-2.1-2 that could possibly be read to expressly preempt home rule authority, Cammacho argues that home rule municipalities may not administratively adjudicate offenses committed by CDL holders because "[t]he Illinois General Assembly has opted into [a] comprehensive tracking and reporting system . . . which includes strict procedures for the reporting of *all* violations committed by CDL holders." Brief and Argument of the Appellees ("Cammacho Br.") 21 (emphasis in original). He asserts that this "means that even a home rule municipality may not operate its own administrative truck enforcement court system." *Id.* That argument is flatly wrong.

This court has made clear that "[c]omprehensive legislation that conflicts with an ordinance is *insufficient* to limit or restrict home rule authority." *Palm v. 2800 Lake Shore Drive Condominium Association*, 2013 IL 110505, ¶ 45 (emphasis added). "It is not enough that the State comprehensively regulates an area which would otherwise fall into home rule power." *Village of Bolingbrook v. Citizens Utilities Co. of Illinois*, 158 Ill. 2d 133 (1994). In other words, there is no "free-wheeling preemption rule resting upon the mere existence of comprehensive state regulation." *City of Chicago v. StubHub, Inc.*, 2011 IL 111127, ¶ 25 (internal quotation marks omitted). Thus, the General Assembly "cannot express an intent to exercise exclusive control over a subject through coincidental comprehensive regulation." *City of Chicago v. Roman*, 184 Ill. 2d 504, 517 (1998) (internal quotation marks omitted). So here, the purported "comprehensive scheme" of legislation

relating to CDL holders is insufficient to preempt Joliet's home rule authority. Therefore, Cammacho has failed to demonstrate that Joliet was precluded from administratively adjudicating his offenses.

Cammacho also cites *People ex rel. Ryan v. Village of Hanover Park*, 311 Ill. App. 3d 515 (1st Dist. 1999), to argue that Joliet has "disrupted the uniform reporting of traffic infractions which the General Assembly demands" by administratively adjudicating his offenses. Cammacho Br. 10. This argument misapplies *Hanover Park*. In that case, the First District interpreted section 11-207 of the Illinois Vehicle Code. *Hanover Park*, 311 Ill. App. 3d at 524-34. Section 11-207 states that the provisions of Chapter 11 of the Vehicle Code "shall be applicable and uniform throughout this State" and that no municipality shall enforce an ordinance that is "in conflict with the provisions of this Chapter." 625 ILCS 5/11-207. Section 11-207 is located in Chapter 11 of the Vehicle Code, so the statutory language of "this Chapter" refers to Chapter 11. The First District explained that "all municipalities are limited to enacting traffic ordinances that are consistent with the provisions of chapter 11 of the Code and that do not upset the uniform enforcement of those provisions throughout the state." *Hanover Park*, 311 Ill. App. 3d at 525.

Hanover Park is irrelevant because no Chapter 11 offense is at issue in this case. Joliet's City Code 19-21 prohibits the operation of any vehicle "more than twenty-four thousand (24,000) pounds (12 tons), on any non-designated city road." Joliet Code of Ordinances § 19-21(a). Cammacho has not alleged that Joliet's ordinance conflicts with any offense from Chapter 11. Indeed, there is no Chapter 11 offense which concerns the weight-rating of vehicles. Rather, the section of the Vehicle Code that is most comparable to Joliet's ordinance appears in Chapter 15 and addresses the "gross weights" of vehicles.

See 625 ILCS 5/15-111. But section 11-207 does not require the uniform enforcement of Chapter 15 offenses. Accordingly, Joliet’s ordinance does not implicate section 11-207’s prohibition of ordinances that conflict with the provisions of Chapter 11, and *Hanover Park* has no bearing on this case.

Simply put, section 1-2.1-2 does not contain the express language that is needed to preempt home rule powers. Cammacho does not argue otherwise. And because section 1-2.1-2 does not preempt home rule authority, the statute does not limit Joliet’s power to administratively adjudicate Cammacho’s offenses. The appellate court’s judgment should be reversed on this basis alone.

II. JOLIET’S MUNICIPAL CODE ALLOWS FOR ADMINISTRATIVE ADJUDICATION OF ITS OVERWEIGHT ORDINANCE.

Cammacho’s argument that Joliet has limited itself to adjudicating only standing, parking, and condition offenses by adopting 625 ILCS 5/11-208.3 is flawed. *See* Cammacho Br. 11-13. Joliet’s Code of Ordinances defines a Code Violation, in part, as a violation of the “Code of Ordinances.” Joliet Code of Ordinances § 3-3. It further provides that the purpose of its administrative adjudication procedure is to “provide a fair and efficient method of the enforcement of municipal regulations through the administrative adjudication of violations of the municipal code.” Joliet Code of Ordinances 3-1(a). Therefore, it provides a basis for administrative adjudication of any violation of the Code.

Joliet’s administrative adjudication of Cammacho’s offenses is clearly authorized by the Code. Cammacho is correct that the Code “adopts 625 ILCS 5/11-208.3 . . . for the adjudication of violations of traffic regulations concerning the standing, parking, or condition of vehicles.” Cammacho Br. 11; *see also* Joliet Code of Ordinances § 3-1(b). But Cammacho omits that, in the very next section, the Code states that “[t]his chapter does

not preclude the city from using other methods to enforce the provisions of its code.” Joliet Code of Ordinances § 3-1(c). Joliet has never passed any ordinance that would prohibit its administrative adjudication of Cammacho’s offenses.

III. SECTION 1-2.1-2(ii) CONTAINS ONLY ONE EXCEPTION.

Section 1-2.1-2 creates a system of administrative adjudication which allows for “the adjudication of *any* violation of a municipal ordinance, except for (i) proceedings not within the statutory or home rule authority of municipalities, and (ii) any offense under the Illinois Vehicle Code or a similar offense that is a traffic regulation governing the movement of vehicles and except for any reportable offense under Section 6-204 of the Illinois Vehicle Code.” 625 ILCS 5/1-2.1-2 (emphasis added).

The appellate court wrongly decided that section 1-2.1-2(ii) contains two exceptions and not one. This reading ignores the paragraph structure and the word “and.” The General Assembly put the exception in outline form. It included only two subparagraphs and the word “and.” The appellate court did not construe this statute to give a reasonable meaning to the paragraph structure. The correct reading would be that subparagraph (ii) refers to offenses that are *both* offenses against traffic regulations governing the movement of vehicles *and* reportable offenses under Section 6-204 of the Illinois Vehicle Code (“section 6-204”).

Therefore, the correct reading of section 1-2.1-2 is that Division 2.1 of the Illinois Municipal Code sets up a system of administrative adjudication that can be used to adjudicate any offense except for (1) offenses that are not within a municipality’s home rule or statutory authority to adjudicate, and (2) reportable offenses under section 6-204 that are traffic regulations governing the movement of vehicles.

IV. JOLIET HAS AUTHORITY TO ADMINISTRATIVELY ADJUDICATE VIOLATIONS OF ITS ORDINANCE UNDER ANY READING OF SECTION 1-2.1-2.

Regardless of whether section 1-2.1-2(ii) contains one exception or two, it does not prevent Joliet from administratively adjudicating the offenses at issue in this case. Cammacho's offenses are not violations of traffic regulations governing the movement of vehicles, and they are not reportable under Section 6-204.

A. Joliet's Ordinance Is Not A Traffic Regulation Governing The Movement Of Vehicles.

Section 1-2.1-2(ii) allows for the administrative adjudication of any municipal code violation other than an "offense under the Illinois Vehicle Code or a similar offense that is a traffic regulation governing the movement of vehicles." 625 ILCS 5/1-2.1-2. Joliet's ordinance is not a traffic regulation governing the movement of vehicles. Therefore, this exception does not prevent Joliet from administratively adjudicating Cammacho's offenses.

As we explained in our opening brief, the phrase "traffic regulation governing the movement of vehicles" is a term of art that appears throughout the Vehicle Code. Joliet Br. 9-10; *see also* Chicago Br. 13-18. This term is defined in the Illinois Administrative Code as "a violation for which points are assigned pursuant to 92 Ill. Adm. Code 1040.20." 92 Ill. Adm. Code 1030.1. It refers to the type of offense that the Secretary of State monitors in order to determine whether a driver is unfit to safely operate a motor vehicle. 92 Ill. Adm. Code 1040.10(b).

The Vehicle Code provisions pertaining to weights of vehicles are not traffic regulations governing the movement of vehicles. *Compare* 625 ILCS 5/15-111 (barring overweight vehicles from operating on roads) *with* 625 ILCS 5/12-610.2 (stating that it is

“an offense against traffic regulations governing the movement of vehicles” to operate a vehicle while using an electronic communication device). The General Assembly has never used the phrase “traffic regulation governing the movement of vehicles” in any section of the Vehicle Code governing overweight vehicles, and the Secretary of State does not monitor or assign points to weight-based offenses. *See generally*, 92 Ill. Adm. Code 1040.20. Because there are no weight-based offenses in the Vehicle Code which are traffic regulations governing the movement of vehicles, there are also no “similar offense[s]” which are traffic regulations governing the movement of vehicles.²

Cammacho did not address this argument in his brief. As we have stated, this court is not compelled to act as an advocate for the appellee. *First Capitol Mortgage Corporation*, 63 Ill. 2d at 133. This court should treat Cammacho’s failure to respond to this point as acquiescence to Joliet’s position. *Bailey*, 375 Ill. App. 3d at 1068-69.

B. Weight-Based Offenses Are Not Reportable Under Section 6-204.

Section 1-2.1-2(ii) also excepts from administrative adjudication “any reportable offense under Section 6-204 of the Illinois Vehicle Code.” 625 ILCS 5/6-204. Offenses against Joliet’s ordinance are not reportable under section 6-204. Therefore, this exception does not prevent Joliet from administratively adjudicating Cammacho’s offenses.

The introductory paragraph of section 6-204 indicates that the reporting requirements are for the “purpose of providing the Secretary of State the records essential

² In any event, Joliet’s ordinance is not similar to any Vehicle Code provision. Joliet’s ordinance limits a vehicle’s gross vehicle weight *rating*. Joliet Code of Ordinances § 19-21. The closest analog in the Vehicle Code is 625 ILCS 5/15-111, which limits a vehicle’s actual *weight*. 625 ILCS 5/15-111. This difference is meaningful because Joliet’s ordinance does not require a vehicle to be weighed. Therefore, Joliet’s ordinance is not a “similar offense” for purposes of section 1-2.1-2.

to the performance of the Secretary's under this Code to cancel, revoke or suspend the driver's license and privilege to drive motor vehicles of ... traffic violations which this Code recognizes as evidence relating to unfitness to safely operate motor vehicles." 625 ILCS 5/6-204(a). Offenses are reportable only if they relate to a driver's fitness to safely operate a vehicle. *Id.*

Cammacho does not argue that the violation of a weight-based offense has any bearing on driver safety. Rather, he argues that violations of Joliet's ordinance are reportable under federal safety standards carried out by the Federal Motor Carrier Safety Administration ("FMCSA"). Cammacho Br. 16-20. But he does not point to a specific standard which would make his offenses reportable. *Id.*³ Likewise, he asserts that the Uniform Traffic Citation and Complaint form has a box for officers to indicate the CDL status and DOT number of traffic violators. Cammacho Br. 20. But he fails to demonstrate why this would make a CDL-holder's offenses reportable under section 6-204. *Id.*

Cammacho next argues that section 6-204 makes *all* offenses by CDL-holders reportable because it requires that, "[i]n accordance with 49 C.F.R. Part 384, all reports of court supervision, except violations related to parking, shall be forwarded to the Secretary of State for all holders of a CLP or CDL or any driver who commits an offense while driving a commercial motor vehicle." Cammacho Br. 18. There are two problems with this argument.

³ Cammacho cites 49 USC § 31311(a)(9), (18), and (19). But 49 USC § 31311(a) does not require states to "report violations of CDL holders and violations committed in commercial motor vehicles," as Cammacho claims. Chicago Br. 21 n. 11. It merely requires states to report traffic offenses committed by an out-of-state driver to the state that issued the driver's license if (1) the driver holds a commercial driver's license issued by another state, or (2) the driver is operating a commercial vehicle without a commercial driver's license. 49 USC § 31311(a)(9).

First, Cammacho ignores the line, “[i]n accordance with 49 C.F.R. Part 384.” 49 C.F.R. Part 384 sets out the minimum reporting standards with which states must comply in order to receive federal funding. 49 C.F.R. § 384.101. Section 384.209 specifically *excludes* weight-based violations from the reporting requirements. 49 C.F.R. 384.209(a).

That section states:

(a) Required notification with respect to CLP or CDL holders.

(1) Whenever a person who holds a CLP or CDL from another State is convicted of a violation of any State or local law relating to motor vehicle traffic control (other than parking, *vehicle weight* or vehicle defect violations), in any type of vehicle, the licensing entity of the State in which the conviction occurs must notify the licensing entity in the State where the driver is licensed of this conviction within the time period established in paragraph (c) of this section.

(2) Whenever a person who holds a foreign commercial driver's license is convicted of a violation of any State or local law relating to motor vehicle traffic control (other than parking, *vehicle weight* or vehicle defect violations), in any type of vehicle, the licensing entity of the State in which the conviction occurs must report that conviction to the Federal Convictions and Withdrawal Database.

Id. (emphasis added). Because 49 C.F.R. Part 384 does not require weight-based offenses to be reported, the part of section 6-204 that Cammacho relies on does not require such offenses to be reported.

Second, there is no such thing as a report of court supervision for weight-based offenses. The statute which allows for court supervision states that a court “may, upon a plea of guilty . . . defer further proceedings and the imposition of a sentence, and enter an order for supervision of a defendant.” 730 ILCS 5/5-6-1(c). But “[t]he provisions of

paragraph (c) shall not apply to a defendant charged with: (1) violating Sections 15-111, 15-112, 15-301 . . . of the Illinois Vehicle Code or a similar provision of a local ordinance.”

730 ILCS 5/5-6-1(f). Sections 15-111, 15-112, and 15-301 of the Vehicle Code set out weight-based offenses. *See* 625 ILCS 5/15-111, 15-112, and 15-301.⁴ In other words, there can never be a report of court supervision for weight-based offenses to forward to the Secretary of State. Therefore, the part of section 6-204 that requires all reports of court supervision for CDL-holders to be forwarded to the Secretary of State has no bearing on whether a CDL-holder’s weight-based offense is reportable.

Joliet’s ordinance is not a traffic regulation governing the movement of vehicles, and offenses against the ordinance are not reportable under section 6-204. Even if this court determines that section 1-2.1-2(ii) creates two exceptions instead of one, Joliet had authority to administratively adjudicate Cammacho’s offenses.

V. CONCLUSION.

Based on the arguments presented above and in Joliet’s opening brief, as well as in Chicago’s brief *amicus curiae*, this Court should reverse the judgment of the Third District.

Respectfully submitted,

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⁴ If Joliet’s ordinance is similar to any provision of the Vehicle Code, it is section 15-111. *Compare* Joliet Code of Ordinances § 19-21 *with* 625 ILCS 5/15-111.

No. 129263

**IN THE SUPREME COURT
OF THE STATE OF ILLINOIS**

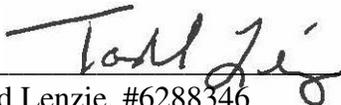
ROBERTO CAMMACHO, JR. JAMES A. JONES, BRUCE D. OLIVER, DAVID B. SPEER, JORGE URBINA) Appeal from the) Appellate Court of Illinois, Third District) No. 3-21-0591))
Plaintiffs/Respondents,) There Heard on Appeal from the Circuit) Court of the Twelfth Judicial Circuit,) Will County, Illinois
vs.) No. 2021 MR 1420)
CITY OF JOLIET, an Illinois municipal corporation,) Honorable John C. Anderson,) Judge Presiding
Defendant/Petitioner.	

CERTIFICATE OF COMPLIANCE

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) table of contents and statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 11 pages.

Respectfully submitted,

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**IN THE SUPREME COURT
OF THE STATE OF ILLINOIS**

ROBERTO CAMMACHO, JR.) Appeal from the
JAMES A. JONES, BRUCE D. OLIVER,) Appellate Court of Illinois, Third District
DAVID B. SPEER, JORGE URBINA) No. 3-21-0591
)

Plaintiffs/Respondents,

vs.

) There Heard on Appeal from the Circuit
) Court of the Twelfth Judicial Circuit,
) Will County, Illinois
) No. 2021 MR 1420
)
) Honorable John C. Anderson,
) Judge Presiding

CERTIFICATE OF SERVICE

I, Carl R. Buck, an attorney, certify that on October 11, 2023, the foregoing APPELLANT’S REPLY BRIEF was filed by electronic means with the Clerk of the Supreme Court of Illinois, 200 East Capitol Avenue, Springfield, Illinois 62701. I further certify that the same were served by electronic transmission on:

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Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

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