

Lesley Hart

From: Eric Olsauskas
Sent: Sunday, June 29, 2025 9:51 AM
To: Lesley Hart
Cc: cityclerk@cityofmarseilles.com
Subject: FOIA Request – Burton, Fuller & Associates Records, Zoning & Utility Communications, and Related Topics

Eric Olsauskas

June 29, 2025

Via Email and U.S. Mail

To:
Lesley Hart
City Clerk & FOIA Officer
City of Marseilles
209 Lincoln Street
Marseilles, IL 61341
cityclerk@cityofmarseilles.com

RE: FOIA Request – Burton, Fuller & Associates Records, Zoning & Utility Communications, and Related Topics

Dear Ms. Hart,

Pursuant to the **Illinois Freedom of Information Act (5 ILCS 140/1 et seq.)**, and with full acknowledgment of my designation as a **recurrent requester** under Section 2(g) of the Act, I respectfully submit the following formal request for public records.

1. Invoices and Financial Records – Burton, Fuller & Associates, P.C.

Please provide **all invoices, billing records, retainer agreements, and payment documentation** related to legal services rendered by **Burton, Fuller & Associates, P.C.**, from **January 1, 2018 through the date of fulfillment**. This includes:

- Itemized statements
- Contracts or engagement letters
- Payment records and approvals
- Accompanying correspondence or transmittal emails

2. Termination and Separation Agreements

Please provide **all records, notices, or communications** relating to the **termination, resignation, or separation of legal services** between the **City of Marseilles** and **Burton, Fuller & Associates, P.C.**, or any attorney affiliated with the firm. This includes:

- Formal letters or notices
- Separation or mutual release agreements
- Final billing summaries
- Internal City discussions or correspondence concerning cessation of services

Timeframe: January 1, 2018 through the date of fulfillment

3. Planning Commission Communications

Please provide **all email communications (including attachments)** to or from **any member of the Marseilles Planning Commission**, exchanged with **Richard Burton** or **Michael Fuller**, that reference or discuss any of the following topics:

- **Constellation**
- **ComEd**
- **Solar farm projects or renewable energy**
- **Zoning changes or amendments**
- **Annexation**
- **Eminent domain**

Timeframe: January 1, 2018 through the date of fulfillment

4. Emails – City Officials, Consultants, and Attorneys

Please also provide **all emails (including attachments)** referencing or discussing **Constellation, ComEd, solar farms, zoning changes, annexation, or eminent domain**, exchanged between **any of the following individuals or entities** and **Richard Burton** or **Michael Fuller**:

- **City Engineer**
- **Etscheid, Duttlinger & Associates**
- **Commissioner Bobby Kaminski**
- **City Clerk Lesley Hart**
- **Mayor James Hollenbeck**

Timeframe: January 1, 2018 through the date of fulfillment

Legal Compliance and Rights Reserved

This request is submitted with the understanding that your office will comply fully with FOIA's requirements as interpreted and enforced by the **Illinois Attorney General's Public Access Counselor (PAC)** under **5 ILCS 140/9.5**.

Should any portion of this request be denied, redacted, or delayed beyond the statutory deadlines, I request a **written explanation citing the specific exemption(s)** along with the factual basis for each, as required by law.

Please be further advised that under **Section 11 of the Act (5 ILCS 140/11)**, I reserve the right to seek **judicial enforcement in the LaSalle County Circuit Court**, including injunctive or declaratory relief, attorney's fees, and any applicable civil penalties if the City is found to have acted willfully or in bad faith.

Records should be provided in **electronic format** where available. Kindly confirm receipt of this request and advise if clarification is necessary.

Thank you for your attention and professionalism in this matter.

Sincerely,
Eric Olsauskas