

Lesley Hart

From: Mathew Underwood
Sent: Tuesday, December 2, 2025 1:23 PM
To: cityclerk@mtco.com; mcampbell@kggllc.com
Subject: Freedom of Information Act Request

January 1, 2021 – Present

Submitted by: Mathew Underwood

To:
Lesley Hart, City Clerk & FOIA Officer & Matthew Campbell FOIA Attorney
City of Marseilles
200 Riverfront Drive
Marseilles, IL 61341
Email: cityclerk@mtco.com & mcampbell@kggllc.com

Date: 02 December 2025

RE: Freedom of Information Act Request – All Communications and Records Related to Constellation Energy.

Dear Clerk Hart:

This is a request for public records under the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq.

I am requesting all records from January 1, 2021 to the present related to, referencing, involving, or pertaining—in whole or in part—to Constellation Energy Generation LLC, Everett Creek Land Company LLC, and all City officials, employees, contractors, and consultants involved with those entities or with the annexation, zoning, planning, and development matters associated with them.

This includes all public records regardless of where they are stored, including personal devices/accounts used for City business as defined by City of Champaign v. Madigan, 2013 IL App (4th) 120662, and Better Government Ass’n v. City of Chicago, 2020 IL App (1st) 190038.

REQUESTED RECORDS

A. ELECTRONIC COMMUNICATIONS

1. All emails sent or received by any City official, employee, contractor, consultant, or attorney.
2. All text messages (SMS, MMS, iMessage).
3. All messages sent or received via WhatsApp, Messenger, Signal, Telegram, Instagram, or any other messaging platform.

4. All call logs, voicemails, and deleted-message logs (if recoverable).

B. DOCUMENTS & FILES

5. All documents, drafts, engineering notes, PDFs, data files, spreadsheets, meeting notes, and correspondence relating to City business.

C. COMMUNICATIONS OF SPECIFIC INDIVIDUALS

6. Communications involving the following phone numbers:

- Mayor James Hollenbeck –
- Commissioner Melissa Small –
- Commissioner James Buckingham –
- Commissioner Michael Scheib –

7. Communications involving City Employees, Planning Commission & Zoning personnel, including:

Dan Lowe; Brian Trainor; Attorney Matthew Campbell; Glenn Combs; Jackie Hanlon; Jim Hanlon; Don Weber; Brad Cresto; Brad Miller; Bob Hauge; Karen Stillwell; Jim Barnes; Scott Caselli; Corbin Webster; and any other Planning Commission members who served between January 1, 2021 and the present.

FOIA SUBJECT EMPHASIS: CONSTELLATION ENERGY LLC & EVERETT CREEK LAND COMPANY LLC

This FOIA specifically includes, but is not limited to, all communications or documents involving:

- Constellation Energy Generation LLC
- Everett Creek Land Company LLC
- any agents, attorneys, consultants, or representatives of Constellation
- any "Submittals," "Derivative Records," drafts, communications, or materials referenced in the Annexation Agreement
- any discussions, meetings, calls, messages, or documents concerning the proposed annexation, zoning, ET District creation, roadwork, incentives, water/sewer issues, impact fees, or land acquisition involving Constellation

FOIA REQUIREMENTS

Pursuant to FOIA:

- If any portion of these records is exempt, provide all non-exempt portions and cite the specific exemption(s).
- A response is required within five (5) business days.
- If an extension is claimed, specify the statutory basis.

This request is not for commercial purposes.

Electronically delivered records are preferred.

DELIVERY OF RECORDS

Please send all responsive documents to:



REQUESTER INFORMATION

Mathew Underwood

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Thank you for your prompt attention to this request.

Respectfully,
/s/ Mathew Underwood

[Yahoo Mail: Search, Organize, Conquer](#)

